

# UNOFFICIAL COPY



\*2206922044\*

IN THE CIRCUIT COURT OF  
COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT  
LAW DIVISION

Doc# 2206922044 Fee \$88.00

RHSP FEE: \$9.00 RPRF FEE: \$1.00

KAREN A. YARBROUGH

COOK COUNTY CLERK

DATE: 03/10/2022 03:05 PM PG: 1 OF 14

MERCHANT ADVANCE, LLC,,

Plaintiff,

vs.

PROMOTION GROUP CENTRAL  
And KELLY DRUMM,

Defendants.

Case No. 2022-L-050117

## CIVIL JUDGMENT COVER SHEET

On March 8, 2022, Judgment was entered in favor of the Plaintiff MERCHANT ADVANCE, LLC, and against Defendants, PROMOTION GROUP CENTRAL whose address is 444 North Orleans, Suite 300, Chicago, Illinois 60654; and KELLY DRUMM whose address is 900 North Highland Avenue, Arlington Heights, Illinois 60004 in the sum of One Hundred and Ninety-One Thousand Seven Hundred Twenty-Two and 13/100ths Dollars (\$191,722.13), a certified copy of which is attached hereto and made a part hereof.

LICHTMAN EISEN PARTNERS, LTD.

By:

  
\_\_\_\_\_  
Marc S. Lichtman, President  
Attorney at Law

THIS DOCUMENT WAS PREPARED BY THE PERSON SET FORTH BELOW. THE UNDERSIGNED CLAIMS AN ATTORNEY'S LIEN UNDER THE NOTICE OF ATTORNEYS LIEN ACT OF 1909, AS AMENDED. ALL NOTICES AND SERVICE OF PROCESS RELATING TO THIS DOCUMENT SHALL ONLY BE EFFECTIVE IF SERVED AND ADDRESSED TO THE PARTY NAMED BELOW AT THEIR THEN CURRENT ADDRESS AS SET FORTH WITH THE ILLINOIS REGISTRATION AND DISCIPLINARY COMMISSION. ALL PAYMENTS MUST BE PAYABLE TO THE "LICHTMAN EISEN PARTNERS CLIENT TRUST FUND ACCOUNT" AND MUST BE SENT TO THE OFFICE LICHTMAN EISEN PARTNERS, LTD., TO DISCHARGE THE AFORESAID ATTORNEY'S LIEN. FAILURE TO FOLLOW THE TERMS SET FORTH HEREIN WILL MAKE ANY PERSON DEALING WITH THIS DOCUMENT LIABLE FOR THE PAYMENT OF LICHTMAN EISEN PARTNER'S ATTORNEYS FEES OR ADDITIONAL SUMS DUE TO THE PLAINTIFF. THIS LIEN WILL NOT BE RELEASED UNLESS THESE INSTRUCTIONS ARE STRICTLY ADHERED TO.

Lichtman Eisen Partners, Ltd.  
Attorneys for the Plaintiff  
134 North LaSalle Street; Suite 750  
Chicago, Illinois 60602 Ph: (312) 332-0247  
Attorney No: 55683

# UNOFFICIAL COPY

FILED  
3/8/2022 12:00 AM  
IRIS Y. MARTINEZ  
CIRCUIT CLERK  
COOK COUNTY, IL  
16969268

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION**

MERCHANT ADVANCE, LLC, )  
)  
Plaintiff )  
)  
vs. )  
)  
PROMOTION GROUP CENTRAL INC and )  
KELLY DRUMM, )  
)  
Defendants. )

Case No. 2022L050117

**NOTICE OF FILING TO REGISTER A FOREIGN JUDGMENT**

**NOTICE OF FILING TO REGISTER A FOREIGN JUDGMENT**

A Judgment from another state (735 ILCS §5/12-650 et seq.)

**TO DEFENDANTS:**

Promotion Group Central, Inc.  
444 North Orleans, Suite 300  
Chicago, Illinois 60654

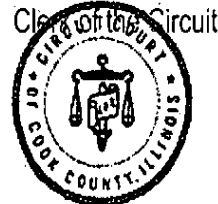
Kelly Drumm  
900 North Highland Avenue  
Arlington Heights, Illinois 60004

You are hereby notified that Plaintiff, MERCHANT ADVANCE, LLC is a New York limited liability company with its principal place of business located at 132 West 36th Street, 3rd Floor, New York, New York 10018, through its attorneys, Lichtman Eisen Partners, Ltd., located at 134 North LaSalle Street, Suite 750, Chicago, Illinois 60602 did this day file an authenticated copy of certain Foreign Judgment in the above entitled action, entered in Supreme Court of the State of New York, County of Erie, on February 6, 2018.

Date: \_\_\_\_\_

3/8/2022 12:00 AM IRIS Y. MARTINEZ

Lichtman Eisen Partners, Ltd.  
Attorneys for the Plaintiff  
134 North LaSalle Street  
Suite 750  
Chicago, Illinois 60602



FILED DATE: 3/8/2022 12:00 AM 2022L050117

# UNOFFICIAL COPY

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3/8/2022 12:00 AM  
IRIS Y. MARTINEZ  
CIRCUIT CLERK  
COOK COUNTY, IL  
16969268

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION

MERCHANT ADVANCE, LLC,

Plaintiff

vs.

PROMOTION GROUP CENTRAL INC and  
KELLY DRUMM,

Defendants.

Case No. 2022L050117

### AFFIDAVIT OF KARA R. EISEN

NOW COMES the Plaintiff, MERCHANT ADVANCE, LLC, a New York limited liability company, by and through its Attorneys, LICHTMAN EISEN PARTNERS, LTD., and for its Petition to Register Foreign Judgment:

I, Kara R. Eisen, on Oath and under Penalties of Perjury state as follows:

1. I am an Attorney at Law licensed to practice law in the State of Illinois.
2. I am over age 18 years and if called to testify am competent to do so.
3. I represent MERCHANT ADVANCE, LLC, a New York limited liability company in the above styled action.
4. I, Kara R. Eisen, have been licensed to practice law in the State of Illinois since 2007.
5. The name and last known address of the Plaintiff is as follows;

MERCHANT ADVANCE, LLC  
132 West 36<sup>th</sup> Street, 3<sup>rd</sup> Floor  
New York, New York 10018.

6. The name and last known addresses of the judgment debtor(s) is as follows:

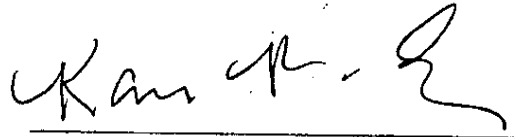
Promotion Group Central, Inc.  
444 North Orleans, Suite 300  
Chicago, Illinois 60654

Kelly Drumm  
900 North Highland Avenue  
Arlington Heights, Illinois 60004

FILED DATE: 3/8/2022 12:00 AM 2022L050117

Property of Cook County Clerk's Office

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Kara R. Eisen

Subscribed and sworn to before me  
this 4<sup>th</sup> day of Mar 2022

  
NOTARY PUBLIC



Property of Cook County Clerk's Office

COOK COUNTY CLERK OFFICE  
RECORDING DIVISION  
118 N. CLARK ST. ROOM 120  
CHICAGO, IL 60602-1387

# UNOFFICIAL COPY

Foreign Judgment Registration Cover Sheet

FILED  
(Rev. 12/01/20) CCG 0630  
3/8/2022 12:00 AM

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY \_\_\_\_\_ DEPARTMENT/ LAW \_\_\_\_\_ DISTRICT \_\_\_\_\_

IRIS Y. MARTINEZ  
CIRCUIT CLERK  
COOK COUNTY, IL  
16969268

Name: MERCHANT ADVANCE, LLC  
Address: 132 West 36th Street, 3rd Floor  
New York, New York 10018

Plaintiff

v.

Name: Promotion Group Central, Inc.  
Address: 444 North Orleans, Suite 300  
Chicago, Illinois 60654

Defendant

2022L050117

Case No. 18-801665

Case Type: \_\_\_\_\_

Amount of Judgment: 191,722.13

## FOREIGN JUDGMENT REGISTRATION COVER SHEET

Please check one of the following:

- A Judgment from another Illinois county (735 ILCS 5/12-106)
- A Judgment from another Illinois county (735 ILCS 5/12-106) (735 ILCS 5/12-501; 735 ILCS 5/12-650 et seq.)

- A Judgment from another state (735 5/12-650 et seq.)
- Foreign state (735 ILCS 5/12-618 et seq.; 735 5/12-650 et seq.)

Additional Litigants (if any):

Plaintiff

Defendant

Name: \_\_\_\_\_

Name: Kelly Drumm

Address: \_\_\_\_\_

Address: 900 North Highland Avenue  
Arlington Heights, Illinois 60004

Name: \_\_\_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Address: \_\_\_\_\_

Name: \_\_\_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Address: \_\_\_\_\_

Name: \_\_\_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Address: \_\_\_\_\_

CLERK

STAPLE THIS COVER SHEET TO THE AUTHENTICATED FOREIGN JUDGMENT. IT IS PART OF THE PERMANENT FILE.

Atty. No.: 55683  Pro Se 99500

Name: Kara R. Eisen

Atty. for Plaintiff: \_\_\_\_\_

Address: 134 North LaSalle Street, Suite 750

City/State/Zip Code: Chicago, Illinois 60602

Telephone: (312) 332-0247

Service via email from opposing party/counsel will be accepted at:

by consent pursuant to Ill. Sup. Court Rules 11 and 131.

Pro Se Only:  I have read and agree to the terms of the Clerk's Office Electronic Notice Policy and choose to opt in to electronic notice from the Clerk's office for this case at this email address:

IRIS Y. MARTINEZ, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

FILED DATE: 3/8/2022 12:00 AM 2022L050117

# UNOFFICIAL COPY

FILED  
3/8/2022 12:00 AM  
IRIS Y. MARTINEZ  
CIRCUIT CLERK  
COOK COUNTY, IL

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION

MERCHANT ADVANCE, LLC,	)
	)
Plaintiff	)
	)
vs.	)
	)
PROMOTION GROUP CENTRAL INC and	)
KELLY DRUMM,	)
	)
Defendants.	)

Case No. 2022L050117

FILED DATE: 3/8/2022 12:00 AM 2022L050117

PETITION TO REGISTER FOREIGN JUDGMENT

NOW COMES, the Plaintiff, MERCHANT ADVANCE, LLC, by and through its Attorneys, LICHTMAN EISEN PARTNERS, LTD., and for its PETITION TO REGISTER A FOREIGN JUDGMENT, against the Defendants, PROMOTION GROUP CENTRAL INC and KELLY DRUMM states as follows:

1. Plaintiff, MERCHANT ADVANCE, LLC is a New York limited liability company.
2. Defendant, PROMOTION GROUF CENTRAL INC is a dissolved Illinois corporation with a registered agent at 444 North Orleans, Suite 300, Chicago, Illinois 60654.
3. Defendant, KELLY DRUMM, is an individual residing at 900 North Highland Avenue, Arlington Heights, Illinois 60004.
4. § 735 ILCS 5/12-652 of the Illinois Code of Civil Procedure, in pertinent part, provides as follows:

**Filing and Status of Foreign Judgments.** (a) A copy of any foreign judgment authenticated in accordance with the acts of Congress or the statutes of this State may be filed in the office of the circuit clerk for any county of this State. The clerk shall treat the foreign judgment in the same manner as a judgment of the circuit court for any county of this State. A judgment so filed has the same effect and is subject to the same procedures, defenses and proceedings for reopening, vacating, or staying as a judgment of a circuit court for any county of this State and may be enforced or satisfied in like manner. A judgment filed or registered under this Act shall be construed to be an original Illinois judgment from the date it is filed with the clerk of the circuit court and for purposes of enforcement and revival, shall be treated in exactly the same manner as an Illinois judgment entered on that same date.

5. On February 6, 2018, a judgment was entered in the Supreme Court of the State of New York, County of Erie, in the matter styled, "Merchant Advance, LLC v. Promotion Group Central, Inc and Kelly Drumm", having Case No. 18-801665, in favor of Plaintiff and against Defendants in the sum of One

# UNOFFICIAL COPY

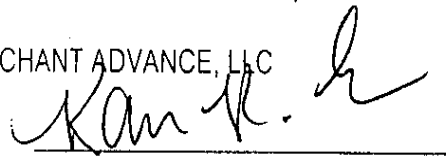
Hundred Ninety-One Thousand Seven Hundred Twenty-Two and 13/100ths Dollars (\$191,722.13) hereinafter referred to as the "Judgment") A certified copy of the Judgment is attached hereto as Exhibit A.

- 6. Said Judgment is in full force and effect.
- 7. No part of said Judgment has been paid.

RESPECTFULLY SUBMITTED,

MERCHANT ADVANCE, LLC

By:



One of Its Attorneys  
Lichtman Eisen Partners, Ltd.

Marc S. Lichtman ([mlichtman@lichtmanpartners.com](mailto:mlichtman@lichtmanpartners.com))  
 Kara R. Eisen ([keisen@lichtmanpartners.com](mailto:keisen@lichtmanpartners.com))  
 McKenzie E. Lee ([mlee@lichtmanpartners.com](mailto:mlee@lichtmanpartners.com))  
 Attorneys for Plaintiff  
 Lichtman Eisen Partners, Ltd.  
 134 North LaSalle Street, Suite 750  
 Chicago, Illinois 60602  
 Ph: (312) 332-0247  
 Attorney No. 55683

Property of Cook County Clerk's Office

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COOK COUNTY CLERK OFFICE  
RECORDING DIVISION  
118 N. CLARK ST. ROOM 120  
CHICAGO, IL 60602-1387

FILED DATE: 3/8/2022 12:00 AM 2022L050117

# EXHIBIT A JUDGMENT

Property of Cook County Clerk's Office

COOK COUNTY CLERK OFFICE  
RECORDING DIVISION  
118 N. CLARK ST. ROOM 120  
CHICAGO, IL 60602-1387



# UNOFFICIAL COPY

## EXEMPLIFIED COPY

State of New York, County of Erie  
SUPREME Court

United States of America }  
State of New York } ss.  
County of Erie }

I, Michael P. Kearns, Clerk of the County of Erie, and also Clerk of the Supreme Court and County Court in and for said County, (the said Courts being Courts of Record) do hereby certify that the above and foregoing is a true and complete certified copy of a judgment in an action entitled:

PLAINTIFF

MERCHANT ADVANCE LLC

VS  
DEFENDANT

PROMOTION GROUP CENTRAL INC  
DRUMM, KELLY

Note: Names are shown Last name First nar

Erie County Index No. 12-18801665 or Lower Court Case CONTRACT on file as Q 309 4078  
and remaining of record in the County Clerk's Office of Erie County.

IN WITNESS WHEREOF, I hereunto set my hand and affixed the seal of said County and Courts, at Buffalo, this 20-February-2019



MICHAEL P. KEARNS, ERIE COUNTY CLERK

United States of America }  
State of New York } ss.  
County of Erie }

a Justice of the Supreme Court in and for the Eighth Judicial District of the State of New York, and the Presiding Magistrate at a Special Term of the Supreme Court, held in and for the County of Erie, in said District, hereby certifies that the above attestation is in due form and by the proper officer.

IN TESTIMONY WHEREOF, I hereunto subscribed my name, at Buffalo, this 20th day of February, 2019

JUSTICE OF THE SUPREME COURT  
MARK A. MONTOUR, J.

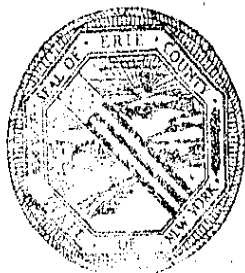
United States of America }  
State of New York } ss.  
County of Erie }

I, Michael P. Kearns, Clerk of the said County, and also Clerk of the Supreme Court and County Court in and for said County, (the said Courts being Courts of Record) do hereby certify that

whose name is subscribed to the annexed and foregoing Certificate, was at the time of the signing thereof, and now is a Justice of the Supreme Court of the State of New York, duly elected, commissioned and qualified, and that the signature of the said Justice is genuine; and further that said Justice was the Presiding Magistrate at the Special Term of the Supreme Court on the date aforesaid.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of the said County and Courts, in Buffalo, this 20th day of February, 2019

MICHAEL P. KEARNS, ERIE COUNTY CLERK



FILED DATE: 3/8/2022 12:00 AM 2022L050117

**UNOFFICIAL COPY**

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ERIE

MERCHANT ADVANCE, LLC

Plaintiffs,

-against-

PROMOTION GROUP CENTRAL, INC and  
KELLY DRUMM,

Defendants.

Index No.: 18 801665

**JUDGMENT BY CONFESSION****Plaintiff's Address:**

132 West 36<sup>th</sup> Street, 3<sup>rd</sup>  
Floor, New York, NY  
10018

Amount Confessed:	<u>\$245,000.00</u>
Amount Paid:	<u>\$91,856.00</u>
Default Amount:	<u>\$\$153,144.00</u>
Interest (from 2/5/2018) at 16%:	<u>\$67.13</u>
Attorneys' Fees Confessed:	<u>\$38,286.00</u>
Costs by Statute (CPLR 3218[b]):	<u>\$15.00</u>
Filing Fee (CPLR 8018[a]):	<u>\$210.00</u>
Total Costs and Disbursements:	<u>\$225.00</u>
<b>Judgment Total:</b>	<u>\$191,722.13</u>

**Attorney Affirmation**

The undersigned, an attorney admitted to practice law in the State of New York, amends under penalty of perjury that I am the Managing Attorney at The Law Office of Tara N. Pomparelli, Esq., PLLC., attorneys for MERCHANT ADVANCE, LLC, and that the disbursements specified above are true, correct, and have been or will necessarily be incurred herein and are reasonable in amount.

Dated: New York, New York  
2/5/18

/s/ Tara N. Pomparelli

Tara N. Pomparelli, Esq.  
The Law Office of Tara N. Pomparelli, Esq., PLLC.  
30 Wall Street, Eighth Floor  
New York, NY 10005  
(212) 634-4655

1 -

**FILED AND  
DOCKETED  
Feb 06 2018  
AT 03:16 P M  
ERIE COUNTY CLERK**

# UNOFFICIAL COPY

ON FILING the foregoing Affidavit of Confession of Judgment made by Defendants herein, sworn on 07/5/2017; and upon the Affidavit in Support of Entry of Judgment, along with the exhibits thereto, and on this application of Tara N. Pomparelli, Esq. attorney for MERCHANT ADVANCE, LLC it is:

ADJUDGED, that Plaintiff MERCHANT ADVANCE, LLC having an address at 132 West 36th Street, 3rd Floor, New York, NY 10018 have judgment and recover from the Defendants, PROMOTION GROUP CENTRAL, INC a business located at 444 N ORLEANS CHICAGO IL 60654, and Defendant KELLY DRUMM who resides at 55010E SAN MIGUEL PARADISE VALLEY AZ 85253, jointly and severally, the sum of \$\$153,144.00, plus interest at 16% from the date of default 2/5/2018 as calculated by the Clerk in the amount of \$67.13, plus costs and disbursements as taxed by the Clerk in the amount of \$225.00, plus confessed attorneys' fees in the amount of \$38,286.00 for a total sum of \$191,722.13; and that Plaintiff MERCHANT ADVANCE, LLC, shall have execution thereon.

FILED DATE: 3/8/2022 12:00 AM 2022L050117

*[Faint, illegible text from a stamp or document bleed-through]*



Judgment entered the \_\_\_\_\_ day of \_\_\_\_\_, 2018.

Judgment Signed and Filed 2/6/2018

*Michael P. Kearns*  
Michael P. Kearns County Clerk

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FILED  
3/8/2022 12:00 AM  
IRIS Y. MARTINEZ  
CIRCUIT CLERK  
COOK COUNTY, IL

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION**

LIBERTAS FUNDING, LLC,

Plaintiff

vs.

NIAGARA LOGISTICS INC, FINESSE INC,  
BARK RIVER LOGISTICS INC, ESCENDENT LLC,  
TRAVIS POWERS, and JAMES WHITELOW,

Defendants.

16973383

Case No. 2022L050116

**NOTICE OF FILING TO REGISTER A FOREIGN JUDGMENT**

**NOTICE OF FILING TO REGISTER A FOREIGN JUDGMENT**

A Judgment from another state (735 ILCS §12-650 et seq.)

**TO DEFENDANTS:**

Niagara Logistics Inc.  
7073 US HWY 2 41 M35  
Gladstone, MI 49837

Escendent LLC  
3633 S Prairie Avenue  
Chicago, Illinois 60653

Finesse Inc.  
7073 US HWY 2 41 M35  
Gladstone, MI 49837

Travis Powers  
4756 S Greenwood Avenue  
Chicago, IL 60615

Bark River Logistics Inc.  
7073 US HWY 2 41 M35  
Gladstone, MI 49837

James Whitelow  
3633 S Prairie Avenue  
Chicago, IL 60615

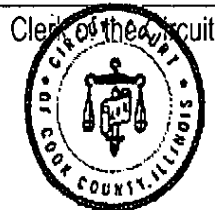
You are hereby notified that Plaintiff, MERCHANT ADVANCE, LLC is a New York limited liability company with its principal place of business located at 132 West 36th Street, 3rd Floor, New York, New York 10018, through its attorneys, Lichtman Eisen Partners, Ltd., located at 134 North LaSalle Street, Suite 750, Chicago, Illinois 60602 did this day file an authenticated copy of certain Foreign Judgment in the above entitled action, entered in Supreme Court of the State of New York, County of Erie, on February 6, 2018.

3/8/2022 12:00 AM IRIS Y. MARTINEZ

Date: \_\_\_\_\_

\_\_\_\_\_

Lichtman Eisen Partners, Ltd.  
Attorneys for the Plaintiff  
134 North LaSalle Street  
Suite 750  
Chicago, Illinois 60602



FILED DATE: 3/8/2022 12:00 AM 2022L050116

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FILED  
3/8/2022 12:00 AM  
IRIS Y. MARTINEZ  
CIRCUIT CLERK  
COOK COUNTY, IL  
16969268

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION

MERCHANT ADVANCE, LLC,  
Plaintiff  
vs.  
PROMOTION GROUP CENTRAL INC and  
KELLY DRUMM,  
Defendants.

Case No. 2022L050117

### AFFIDAVIT OF KARA R. EISEN

NOW COMES the Plaintiff, MERCHANT ADVANCE, LLC, a New York limited liability company, by and through its Attorneys, LICHTMAN EISEN PARTNERS, LTD., and for its Petition to Register Foreign Judgment:

I, Kara R. Eisen, on Oath and under Penalties of Perjury state as follows:

1. I am an Attorney at Law licensed to practice law in the State of Illinois.
2. I am over age 18 years and if called to testify am competent to do so.
3. I represent MERCHANT ADVANCE, LLC, a New York limited liability company in the above styled action.
4. I, Kara R. Eisen, have been licensed to practice law in the State of Illinois since 2007.
5. The name and last known address of the Plaintiff is as follows;

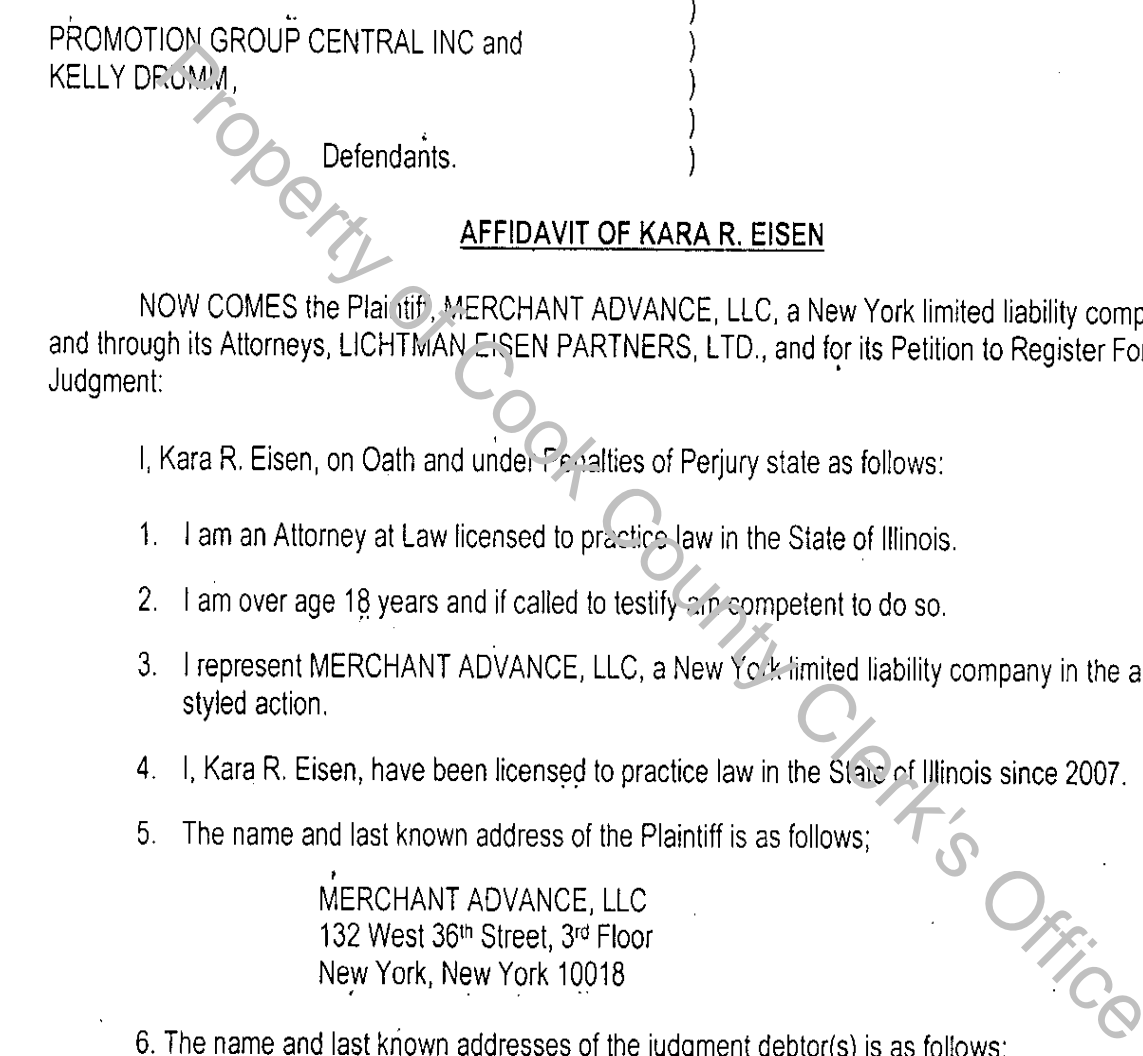
MERCHANT ADVANCE, LLC  
132 West 36<sup>th</sup> Street, 3<sup>rd</sup> Floor  
New York, New York 10018

6. The name and last known addresses of the judgment debtor(s) is as follows:

Promotion Group Central, Inc.  
444 North Orleans, Suite 300  
Chicago, Illinois 60654

Kelly Drumm  
900 North Highland Avenue  
Arlington Heights, Illinois 60004

FILED DATE: 3/8/2022 12:00 AM 2022L050117



# UNOFFICIAL COPY

*Kara R. Eisen*

Kara R. Eisen

Subscribed and sworn to before me  
this 4<sup>th</sup> day of Mar 2022

*Mell*  
NOTARY PUBLIC



Property of Cook County Clerk's Office

FILED DATE: 3/8/2022 12:00 AM 2022L050117

