

INTRODUCTION

1. Defendants BRIAN GRIMM, DARREN GILMORE, and J. GREGORY are currently in the midst of an inter-state campaign of harassment, intimidation, and terror against animal rescuers, reporters, and anyone else who may know the whereabouts of dozens of German Shepherd dogs that *other* San Bernardino Sheriff's Deputies had called on community members to help rescue from horrific conditions on unimproved land from literally the middle of nowhere on August 8, 2020. Defendants instead decided the dogs must be returned to their abusers who abandoned them, apparently in order to limit potential liability of the County.

2. Following the arrest of the landowner of a parcel recorded as "13350 Trump Blvd., Barstow CA 92311," Alla Zorikova, on animal cruelty charges, and San Bernardino Animal Control seizing *some* of the animals from the land, Sheriff's deputies *other than* Defendants, as well as nearby community members, sprang into action. Below is a true and correct photograph taken of dogs on the land waiting to be rescued following Zorikova's arrest on August 8, 2020:



1 3. Zorikova left the dogs were unsheltered, without food or water, on unimproved land in
2 the desert. The temperature was 104 degrees on the day the dogs were rescued.

3 4. Multiple sources within the San Bernardino Sheriff's Department put out frantic calls for
4 help to community members on or about August 8, 2020 that San Bernardino Animal Control had just
5 seized dozens of German Shepherds abandoned in the desert, but had also left about 80 behind, and had
6 already euthanized many of those seized. Rescue groups and other Good Samaritans sprang into action
7 and rescued the animals left behind at their own expense and acting as volunteers.

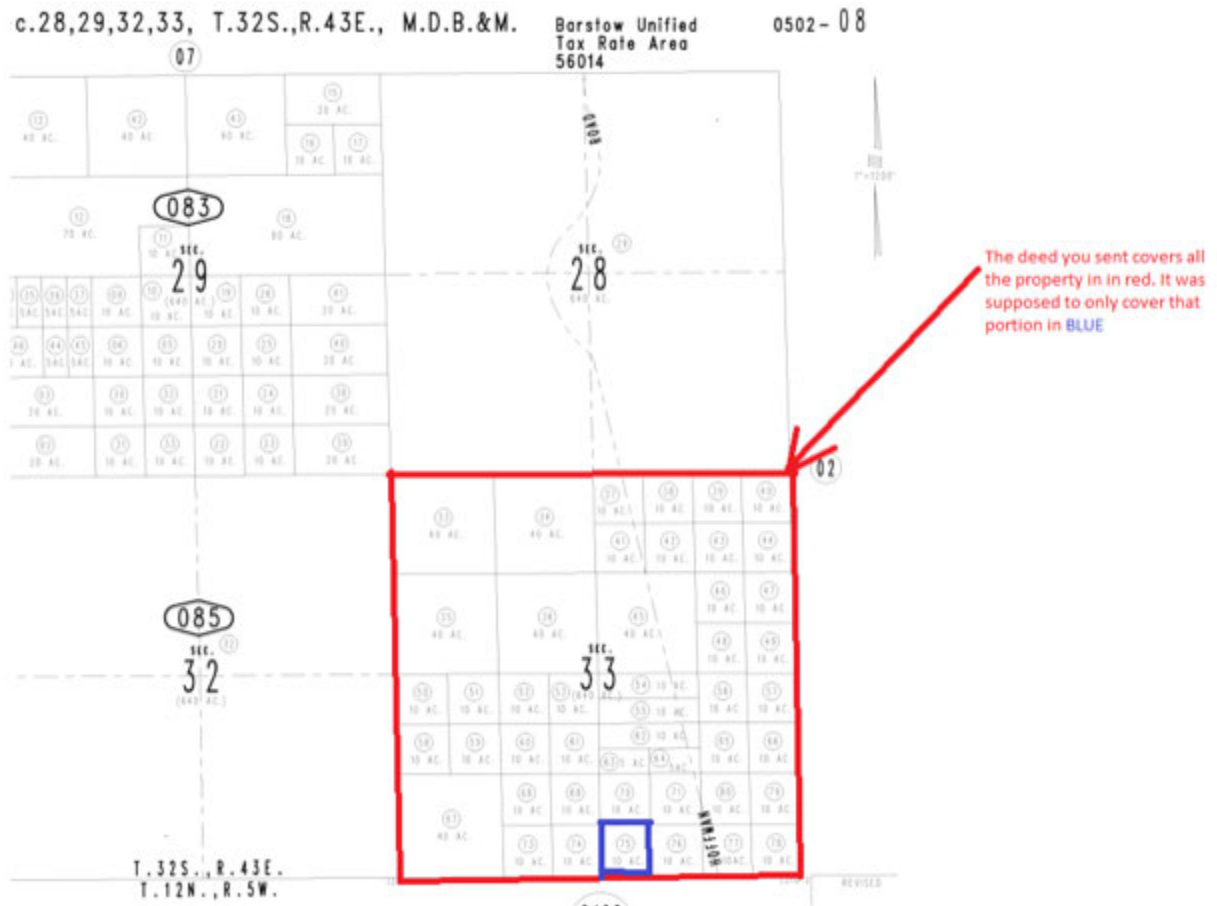
8 5. Defendants have ever since been misrepresenting facts to obtain warrants in California
9 and Nevada, harassing, threatening, and interrogating Plaintiffs and others repeatedly despite being
10 advised that all are represented by counsel, and confiscated Plaintiffs' cellphones and computers from
11 their homes, as well as phones and computers belonging to third parties, and have been threatening to
12 come back again to do the same thing all over again.

13 6. The purpose behind Defendants' actions appears to be to mitigate liability of San
14 Bernardino County regarding dogs having been rescued *at the behest of Sheriff's deputies*, and the
15 "attack dog" business now threatening to sue the County for hundreds of thousands of dollars, owned
16 by Alla Zorikova. The website of this illegal and unpermitted business is

17 <http://www.vonmarkgrafgermanshepherds.us/>

18 7. A true and correct copy of the currently recorded grant deed to the land on "Trump
19 Boulevard" is attached hereto as Exhibit 1. This grant deed purports to convey from Alla Zorikova to
20 Alla Zorikova, Dmitreeva Zinaida, Olivia Jeong, and Urid Semenikin, "vacant land section 33, T32S,
21 R43E." However, the prior deed that was recorded, under which Zorikova obtained the land, was only
22 for "The Southwest Quarter of the Southwest Quarter of the Southeast Quarter of Section 33, Township
23 32 South, Range43 East Mount Diablo Meridian." A true and correct copy of this previous grant deed
24 is attached hereto as Exhibit 2.

25 8. Thus, Zorikova attempted to convey to herself and additional parties more land than she
26 actually owns, as seen below in an image created by a title company showing how the currently
27 recorded grant deed covers more land than the previously recorded deed:
28

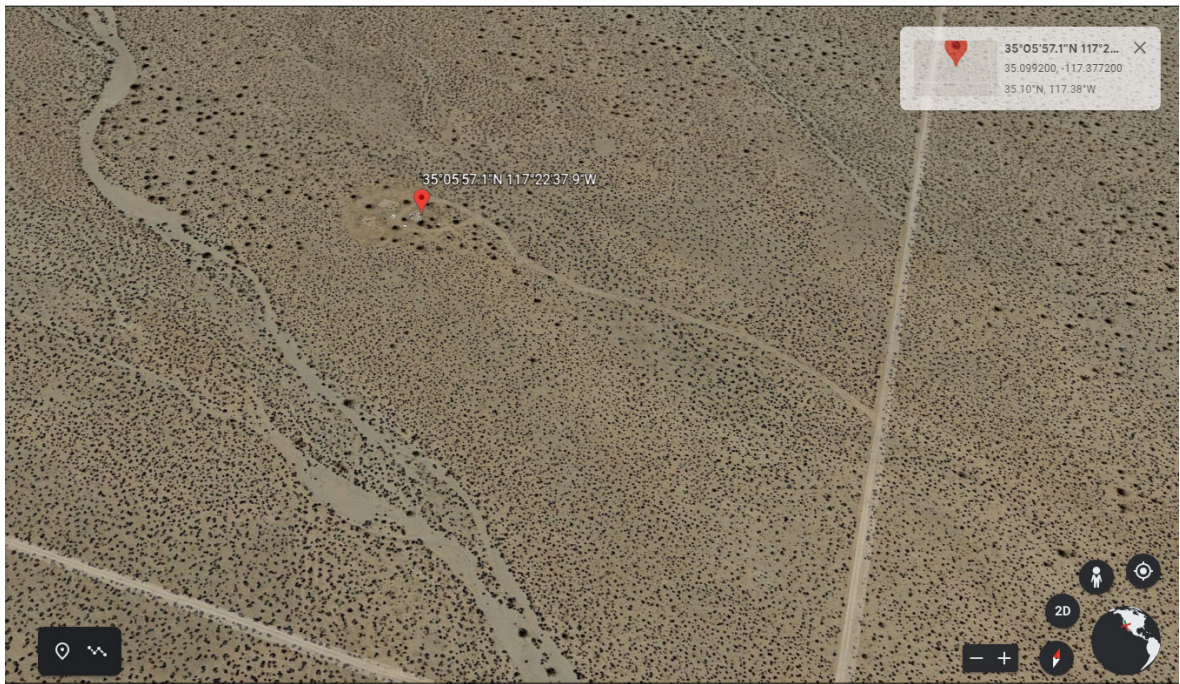


9. The Sheriffs' deputies who originally contacted community members to help rescue dogs from the location stated the land was actually BLM land that Zorikova was squatting on.

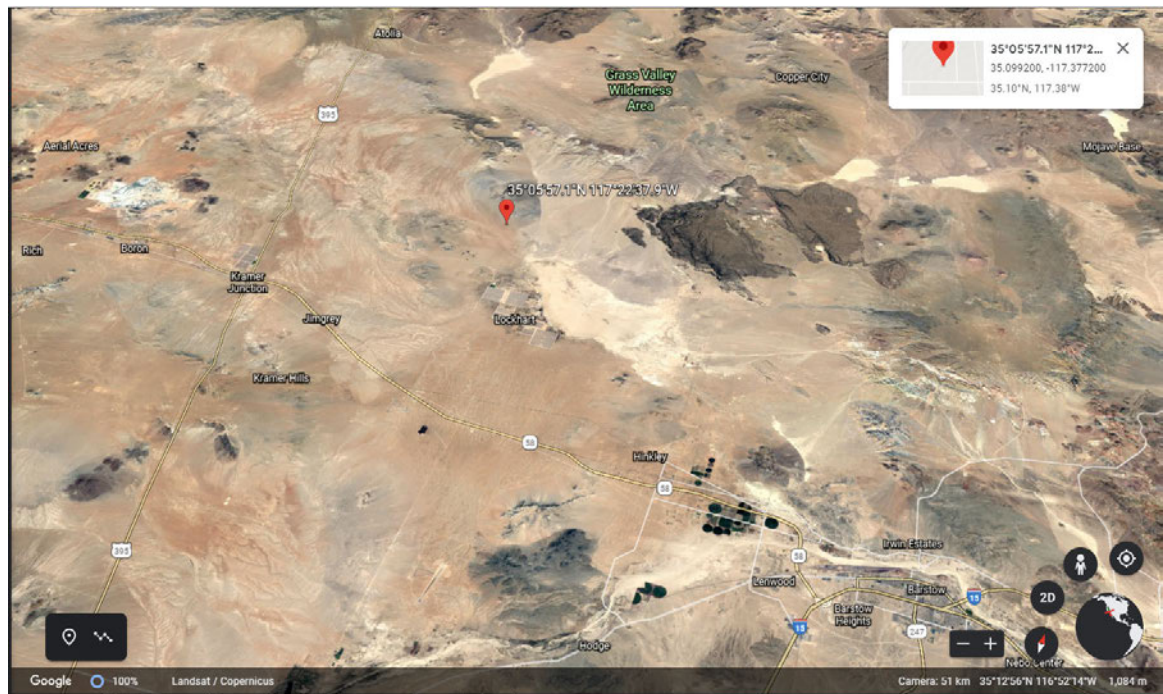
10. Based on the property records in which Zorikova claims to own more land than her original title had, the dogs that she abandoned that Defendants are now investigating the "theft" of may not have even been on land actually owned by Zorikova.

11. The latitude and longitude coordinates of the land are: 35.099200, -117.377200.

12. The below image from Google Earth shows the land truly being in the middle of nowhere:



13. A zoomed out view shows the location relative to the nearest roadways:



1 14. The below image from Google Maps shows the location relative to Los Angeles and Las
2 Vegas:



19 15. Unless immediately restrained and enjoined by the Court, Defendants will continue their
20 lawless actions in a campaign of intimidation and terror aimed at punishing and deterring Plaintiffs
21 from their ongoing volunteer activities and petitioning their government for redress of grievances.

22 16. Defendants know there is no valid basis for any criminal charges against Plaintiffs or
23 any individuals believed to have been involved in rescuing the abandoned dogs from unimproved land,
24 because multiple Sheriff's deputies affirmatively called and *asked* volunteer rescue groups to step in
25 and rescue the animals. None of the rescue groups or individuals who helped rescue these animals
26 received any compensation for doing, nor did they sell any animals.

27 17. Yet, Defendants are now showing up at multiple animal rescue volunteers' house in
28 California and Nevada suspected of having information, interrogating them for hours despite being

1 informed the parties are represented, separating them from their children, and treating them like
2 criminals, all ostensibly for the purposes of locating the abused and neglected animals for purposes of
3 returning them to their abusers. Defendants even showed up at the home of a *news reporter* in Nevada
4 demanding information about the whereabouts of the dogs this week.

5 **JURISDICTION AND VENUE**

6 18. This Court has personal jurisdiction over each of the Defendants because each is
7 domiciled in California.

8 19. This Court has subject matter jurisdiction over this action because relief is sought
9 pursuant to Penal Code §§ 1538.5 and 1540; CCP §§ 526a and 1060; Civil Code § 52.1; and California
10 common law.

11 20. Venue is proper in this county because all Defendants are domiciled in in this county.

12 **PARTIES**

13 21. Plaintiff [REDACTED] is an individual residing in San Bernardino County. [REDACTED]
14 [REDACTED] is a real estate agent who volunteers virtually all of her free time rescuing animals and working
15 with organizations that provide free service animals to veterans and first responders affected by post-
16 traumatic stress disorder ("PTSD"). In addition to her love of animals, [REDACTED] was inspired to do this
17 by her son returning from service in Afghanistan with PTSD and needing a support animal, and finding
18 that they typically cost thousands of dollars and are inaccessible to many returning veterans.

19 22. Plaintiff [REDACTED] is an individual residing in San Bernardino County. Ms.
20 [REDACTED] is employed as a firefighter and also volunteers much of her time rescuing animals and working
21 with various animal rescue organizations, including one that she runs herself as a volunteer.

22 23. Plaintiff [REDACTED] is an individual residing in Nevada and is the co-founder of
23 [REDACTED] a 501(c)(3) nonprofit animal rescue organization that
24 she and her husband run as volunteers.

25 24. Defendant SAN BERNARDINO SHERIFF'S DETECTIVE BRIAN GRIMM is an
26 individual residing in San Bernardino County and is a detective with the San Bernardino Sheriff's
27 Department.
28

25. Defendant SAN BERNARDINO SHERIFF'S SERGEANT DARREN GILMORE is an individual residing in San Bernardino County and is a sergeant with the San Bernardino Sheriff's Department.

26. Defendant SAN BERNARDINO SHERIFF'S DEPUTY J. GREGORY is an individual residing in San Bernardino County and is a deputy with the San Bernardino Sheriff's Department. Plaintiffs are unaware of Defendant GREGORY'S first name and will amend the complaint to add it once determined.

27. Plaintiffs are informed and believe and thereon allege that each of the fictitiously named DOE Defendants is responsible in some manner for the acts, omissions, and damages alleged herein. Plaintiffs are unaware of the true names and capacities of the DOE Defendants, and, therefore, sues these Defendants under such fictitious names. Plaintiffs are informed and believe and thereon alleges that each of said fictitiously named Defendants was the agent, servant and employee of each and every other Defendant acting within the course and scope of his or her agency and employment, and with the knowledge, ratification and consent of each respective principal. Plaintiffs will seek leave to amend this Complaint when their true names and capacities have been ascertained.

ALLEGATIONS OF FACT

A. San Bernardino Sheriff's Department asks for help rescuing animals

28. On or about August 8, 2020, multiple San Bernardino County Sheriff's deputies contacted various animal rescue groups regarding a case of cruelty, abandonment, and neglect of German Shepherds in the desert and requested these volunteers remove neglected and abused dogs left to starve on land in the middle of nowhere in the desert.

29. The location of the property where the dogs were found was extremely remote, miles and miles into the middle of the desert, on vacant land, as shown in the introductory photos and maps. There were no dirt roads, no running water, or any housing structures. These dogs were quite literally left alone and abandoned in the desert.

30. The dogs did not have any housing or shelter from the extreme elements of the blistering desert heat, which is a violation of California law and San Bernardino County code. The day that rescuers were on property, it was 104 degrees. Most of the dogs had dug holes in the ground over time

1 to try to escape the heat because they had zero shelter. And those were the lucky ones. Some were
2 permanently confined to small wire cages which offered no protection from the elements, which
3 constitutes torture. Some were illegally tied up around the neck with chains. Among the dogs rescued
4 were pregnant females. Failing to provide adequate shelter; permanently confining dogs; and tying up
5 dogs in extreme heat is a violation of California cruelty laws, and constitutes abuse and neglect.

6 31. Notably, while there were 80+ dogs living on the property, there were absolutely no
7 feces on the ground; and veterinarians later confirmed the dogs' bellies were full of their own feces.
8 Given there was not a single pile of feces, they were apparently consuming the same out of necessity.
9 Failure to properly feed animals constitutes malnourishment and is reflective of abandonment and
10 neglect.

11 32. There was no running water on the property, or electricity, or any housing structure for
12 humans to live in. The land was totally vacant with only a small makeshift shanty or shed that was
13 filthy. The shed had no toilet, sink, shower or bed. The dogs were exposed to predatory animals. There
14 were dead animal carcasses all over (large bones and skulls) the property, which were possibly other
15 dogs and animals that were used as food, or dogs that had died due to exposure or predators. The
16 property smelled of decomposing flesh. There were two live goats that may have been slated as food
17 for the dogs, and a chicken, which was perhaps intended to feed the dogs.¹ It also appeared, and
18 smelled, that there was a rotting deer carcass that may have been being used to feed the dogs. These
19 conditions all reflect a life of cruelty, abandonment and terrible neglect.

20 33. There was only one drum of liquid on the property. It contained red liquid and was
21 covered in bugs. The dogs had no access to water to drink. Every single dog at the property was
22 dehydrated, panting and extremely thirsty. Not one of the dogs had water available to it when the
23 rescuers arrived. This fact alone is a violation of San Bernardino County code 32.0113(c). Upon their
24 arrival, rescuers provided water in pans for the dogs to drink.

25 34. A San Bernardino Sheriff's Deputy advised some of the rescuers prior to entering the
26 unimproved land containing the dogs that the dogs' alleged owners did not own the actual parcel on

27 _____
28 ¹ Zorikova and Jeong's website (www.vonmarkgrafgermanshepherds.us) claims they feed their dogs raw
meat only.

1 which the dogs were found. Rather, this deputy believed the land at the exact location was owned by
2 the Bureau of Land Management.

3 35. The dogs' alleged owners, Zorikova and Jeong, claim to be breeders of "protection
4 dogs" and/or "attack dogs," operating out of Los Angeles, and whose dogs are trained to bite. (See
5 <http://www.vonmarkgrafgermanshepherds.us>). Pursuant to San Bernardino County Code, it is illegal to
6 have more than five dogs on the property without a breeder license or kennel permit. Additionally,
7 training dogs to bite and be aggressive amounts to cruelty and neglect.

8 36. The dogs that were rescued were all full of parasites (including the pregnant dogs),
9 which constitutes cruelty and reflects a life of abandonment and horrible neglect. Some showed signs of
10 malnourishment and being underweight. Dogs had hookworms, round worms, and hernias; and some
11 were double crypto. All were inbred as evidenced by widespread umbilical hernias and un-descended
12 testicles throughout the population. Some had fractured teeth, which the veterinarians have advised is
13 indicative of dogs trying to chew through their metal chains or metal enclosures, or even eating rocks.
14 Veterinarians documented burnt paw pads, distended abdomens, and diarrhea in these dogs.

15 37. These dogs were very sick and their medical conditions were left untreated by Zorikova
16 and Jeong. The dogs all had filthy coats, and were covered in dirt and sand from living a lifetime in the
17 open desert. They all had extreme amounts of dirt in their ears, and unkept nails, some so long that the
18 nails were growing into the pads of the dogs' feet. Others had green discharge from their nose, and
19 loops of intestines. None of the dogs appeared to have been vaccinated against rabies, as required by
20 California law and San Bernardino County code, nor was the property adequately fenced.

21 38. Zorikova and Jeong's website indicates they had puppies that were born on July 29,
22 2020. If true, the puppies would have been 10 days old by August 8 when animal control officers
23 appeared at the property. When rescuers arrived, a San Bernardino Sheriff's deputy told the rescuers
24 that Zorikova and Jeong had already removed the puppies from their nursing mother (the puppies were
25 reportedly found in the shed). Removing puppies this young from their mothers is also a violation of
26 animal cruelty laws. Zorikova and Jeong refused to identify the nursing mother to animal control
27 officers. Therefore, officers were unable to obtain nourishment for the puppies. Because 10-day old (or
28

three-week-old) puppies likely cannot survive without their nursing mother, Zorikova and Jeong are liable for cruelty and neglect for failing to identify the mother to animal control.

39. Upon Zorikova and Jeong's arrest for animal cruelty on August 8, 2020, only the 14 puppies were immediately seized by animal control, which then inexplicably euthanized the puppies. This action by animal control was apparently the motivating factor for Sheriffs' deputies to call on community members to come rescue the other dogs, so that the notorious San Bernardino Animal Control and Devore Animal Shelter would not end up with them.

40. Upon the release of Zorikova and Jeong from jail on animal cruelty charges, San Bernardino Animal Control returned all dogs they had seized in the days after these animal cruelty arrests, and the charges were then inexplicably dropped.

41. Zorikova and Jeong's website indicates that they German Shepherds for up to \$55,000, and they are willing to ship them anywhere. It is doubtful anyone would buy a parasite infested dog with broken teeth that is supposed to be a "bite dog" for \$55,000. Therefore, Zorikova and Jeong are likely committing fraud by advertising the sale of healthy dogs without a license. It is also not likely that these dogs would withstand being shipped in their condition.

B. Defendants begin terrorizing suspected animal rescuers

42. On September 3, 2020, Defendants showed up at Ms. [REDACTED] home and claimed they had a search warrant, which they did not produce. About 20 minutes passed before Defendants finally produced a search warrant. During this time, Defendants ordered Ms. [REDACTED] to remain on her porch, and to "sit down" while they went inside and looked through her house before producing any warrant.

43. Ms. [REDACTED] 9-year-old granddaughter was present and is now afraid of Sheriff's deputies, since Defendants barged into her room and scared her, causing her to hide behind the curtains.

44. Defendants misrepresented facts to obtain the overbroad warrant and searched the home of Ms. [REDACTED] seized several items, including her iPhone, her laptop, her daughter's laptop that she needs for work, and mail addressed to Ms. [REDACTED]

45. Ms. [REDACTED] 31-year-old disabled daughter, Plaintiff [REDACTED], lives with Ms. [REDACTED] and had her arm in a cast on this day from recent surgery. Defendants frightened Ms. [REDACTED] grabbed her by the arm that was in a cast, and tried to put her in handcuffs, causing further injury to her arm.

1 46. Defendants came in screaming and yelling loudly, treating the [REDACTED] family like
2 criminals, and terrified a dog Ms. [REDACTED] had just rescued who was already afraid of humans and is now
3 having even more severe behavioral issues, including gnawing his own arm severely, requiring
4 antibiotics.

5 47. Ms. [REDACTED] regularly volunteer for animal rescue organizations as a foster and transporter.
6 Ms. [REDACTED] has been doing this all her life and has never been paid for it. There have been other situations
7 where dogs have been abandoned in the desert in the past, and Ms. [REDACTED] has helped transport such
8 animals. Ms. [REDACTED] believes Defendants suspect her of being involved in this particular event because of
9 a Facebook post about her volunteer animal rescuing activities, and Defendants are targeting animal
10 rescuers in the area.

11 48. Ms. [REDACTED] other daughter who lives with her is 26-years-old, an EMT, and recently
12 finished firefighter training school. She works nights and is applying for firefighting jobs. When
13 Defendants took this daughter's laptop, she informed them that all of her certificates were on it and she
14 needed it for a firefighting job application due the next day. She and Ms. [REDACTED] also informed
15 Defendants the laptop belonged only to her and not to Ms. [REDACTED] Defendants did not care and took the
16 laptop anyway, which they have still refused to return.

17 49. Ms. [REDACTED] is afraid for her and her family's safety and security of her property, and that
18 Defendants will keep coming back, taking phones and computers, leaving her without the ability to
19 communicate. Having phones and computers seized has impacted Ms. [REDACTED] and her daughter's work,
20 and her ability to communicate. Ms. [REDACTED] will suffer irreparable harm if her and her family's property is
21 not returned, and Defendants ordered not to continue seizing phones and computers from them.

22 50. On September 9, 2020, Defendants searched the home of Plaintiff [REDACTED], seized
23 several items belonging to her and her husband, including an iPad, bank statement, and cellphone.

24 51. Ms. [REDACTED] informed Defendants at the time she has an attorney and to call him, but
25 Defendants refused to stop questioning Plaintiff for several minutes. Defendant Grimm then finally
26 called Plaintiff's attorney, Bryan Pease. After Defendant Grimm finished talking to Plaintiff's attorney,
27 who instructed him again not to question Ms. [REDACTED] and to direct all questions to counsel, Defendants
28 continued questioning and interrogating Ms. [REDACTED]

52. Defendant Gilmore threatened to send more officers back to again search Plaintiff's home and look for more phones.

53. Ms. [REDACTED] is employed as a firefighter and also runs an animal rescue nonprofit, which she does as a volunteer. Plaintiff relies on her phone to communicate with others and run her rescue. Plaintiff does not have a landline. Without a phone, Plaintiff's husband and Plaintiff would not even be able to call 911 in an emergency.

54. Plaintiff [REDACTED] is afraid for her and her family's safety and security of their property, and that Defendants will keep coming back, taking phones and computers, leaving them without the ability to communicate, and will prevent them from running Plaintiff's animal rescue nonprofit. Plaintiff will suffer irreparable harm if her and her family's property is not returned, and Defendants ordered not to continue illegally seizing phones and computers.

55. Defendants also showed up at the home of [REDACTED] on September 10, 2020, who is an animal rescuer suspected of having information about the dogs' whereabouts. Defendants produced yet another search warrant and terrorized Ms. [REDACTED] for several hours, separated her from her children, and interrogated her despite having previously been directly informed by Plaintiffs' counsel Casey Gish that he was representing Ms. [REDACTED] and all questions should be directed to him.

FIRST CAUSE OF ACTION

Return of Property

(Penal Code §§ 1538.5, 1540)

56. Plaintiffs re-allege and incorporate by reference all prior paragraphs of this Complaint as though each were set forth herein in full.

57. Plaintiffs demand immediate return of their property based on the following factors:

- a. The property or evidence obtained is not that described in the warrant, pursuant to Penal Code § 1538.5(a)(1)(B)(ii);
- b. There was not probable cause for the issuance of the warrant, pursuant to Penal Code § 1538.5(a)(1)(B)(iii);
- c. The method of execution of the warrant violated federal or state constitutional standards, pursuant to Penal Code § 1538.5(a)(1)(B)(iv);

- 1 d. There was any other violation of federal or state constitutional standards,
2 pursuant to Penal Code § 1538.5(a)(1)(B)(v);
3 e. The property taken is not the same as that described in the warrant, pursuant to
4 Penal Code § 1540; and
5 f. There is no probable cause for believing the existence of the grounds on which
6 the warrant was issued, pursuant to Penal Code § 1540.

7 **SECOND CAUSE OF ACTION**

8 **Misuse of Public Funds**

9 **(CCP § 526a)**

10 58. Plaintiffs re-allege and incorporate by reference all prior paragraphs of this Complaint as
11 though each were set forth herein in full.

12 59. California Code of Civil Procedure section 526a permits private individuals or entities to
13 bring an action to “obtain a judgment, restraining and preventing any illegal expenditure of, waste of, or
14 injury to, the estate, funds, or other property of a local agency.”

15 60. Plaintiffs [REDACTED] are residents of, and pay taxes in and to, the County
16 of San Bernardino, and therefore having standing to bring an action under section 526a.

17 61. Plaintiff [REDACTED] sometimes pays sales taxes and other taxes in and to the County of San
18 Bernardino, and therefore has standing to bring an action under section 526a.

19 62. Defendants are misusing and wasting public funds by conducting a sham investigation
20 of alleged “theft” of dogs that were abandoned and that other Sheriff’s deputies explicitly called on
21 community members to come rescue. Defendants must return all funds spent on this sham
22 investigation, to the County of San Bernardino.

23 **THIRD CAUSE OF ACTION**

24 **Declaratory Relief**

25 **(CCP § 1060)**

26 63. Plaintiffs re-allege and incorporate by reference all prior paragraphs of this Complaint as
27 though each were set forth herein in full.

28 64. There is a current controversy over whether Defendants’ investigation is lawful and

1 whether any crime was actually committed in the rescue of abandoned dogs from unimproved land in
2 the middle of nowhere after Sheriffs' deputies called on community members to come take the dogs.

3 65. Unless the rights and duties of the parties are declared by the Court, there will continue
4 to be disputes and controversies over the rightful ownership of the dogs and the validity of the
5 investigation.

6 **FOURTH CAUSE OF ACTION**

7 **Bane Act**

8 **(Civil Code § 52.1)**

9 66. Plaintiffs re-allege and incorporate by reference all prior paragraphs of this Complaint as
10 though each were set forth herein in full.

11 67. Defendants committed unlawful violence against Plaintiffs' persons and property in
12 order to punish and deter Plaintiffs from exercising their constitutional rights of freedom of speech and
13 petitioning their government for redress of grievances.

14 68. Specifically, Defendants sought to punish and deter Plaintiffs from posting on social
15 media about the dogs that San Bernardino Sheriffs' deputies asked community members to come
16 rescue, and to punish and deter Plaintiffs from criticizing the actions of San Bernardino Animal
17 Control.

18 69. Plaintiffs did not consent to Defendants' actions.

19 **FIFTH CAUSE OF ACTION**

20 **Ralph Act**

21 **(Civil Code § 51.7)**

22 70. Plaintiffs re-allege and incorporate by reference all prior paragraphs of this Complaint as
23 though each were set forth herein in full.

24 71. Defendants committed unlawful violence against Plaintiffs' persons and property due to
25 Plaintiffs' perceived membership in an identifiable group, to wit, animal rescuers who were opposed to
26 the actions of the County of San Bernardino as it pertains to treatment of animals and handling of
27 animal cruelty cases such as the one against Alla Zorikova, which was inexplicably dropped.

28 72. Plaintiffs did not consent to Defendants' actions.

1 **SIXTH CAUSE OF ACTION**

2 **Negligence**

3 73. Plaintiffs re-allege and incorporate by reference all prior paragraphs of this Complaint as
4 though each were set forth herein in full.

5 74. Defendants had a duty not to conduct themselves in the manner in which they did.

6 75. Plaintiffs' actions were at all times reasonable, and Plaintiffs did not consent in any way
7 to Defendants' actions.

8 76. Plaintiffs were harmed by Defendants' actions, and Defendants' negligence was a
9 proximate cause of Plaintiffs' harm.

10 **PRAYER FOR RELIEF**

11
12 WHEREFORE, Plaintiffs pray for judgment against Defendants as follows:

13 1. For general and special compensatory damages (including direct, indirect, and
14 emotional damages), presumed damages, and nominal damages in amounts to be determined by
15 the trier of fact, against all Defendants;

16 2. For a civil penalty of \$25,000 against all Defendants on behalf of each Plaintiff
17 under Civil Code § 52.1;

18 3. For injunctive relief against Defendants enjoining them from continuing to
19 deprive Plaintiffs of their property;

20 4. For reasonable attorney's fees and costs and expenses of litigation, pursuant to
21 California Civil Code § 52, Code of Civil Procedure § 1021.5 and any other relevant statutory or
22 case law, against all Defendants.

23 5. For such other and further legal and equitable relief as the Court deems just and
24 proper.

25
26 Dated: October 5, 2020

By: 

Bryan W. Pease, Esq.
Attorney for Plaintiffs

Exhibit 1

RECORDING REQUESTED BY

Alla Zorikova

AND WHEN RECORDED MAIL DOCUMENT AND
TAX STATEMENT TO:

NAME

Olivia Jeong

STREET
ADDRESS

**279 Quantrell
Hollan**

CITY, STATE &
ZIP CODE

**Montreal, MO
65591**

Recorded in Official Records, County of San Bernardino



BOB DUTTON
ASSESSOR - RECORDER - CLERK

11/29/2018

11:46 AM

NP

SAN

R Regular Mail

Doc# 2018-0443016



Titles	1	Pages	1
Fees		14.00	
Taxes		0.00	
CA SB2 Fee		75.00	
Others		0.00	
Paid		\$89.00	

TITLE ORDER NO.

ESCROW NO.

SPACE ABOVE THIS LINE FOR RECORDER'S USE ONLY

GRANT DEED

APN:

0502-085-75-0000

The undersigned grantor(s) declare(s):

DOCUMENTARY TRANSFER TAX \$ **0.00**

☒ computed on full value of property conveyed, or

☐ computed on full value less liens and encumbrances remaining at time of sale.

☐ Unincorporated Area ☐ City of _____

FOR VALUABLE CONSIDERATION, receipt of which is hereby acknowledged, I (We)

hereby remise, release and grant to **Alla A. Zorikova**
Dmitreeva Zinaida, Olivia Jeong,
Urij Semerikin, Alla Zorikova

the following described real property in the City of

BARSTOW, County of **San Bernardino**

State of California, with the following legal description:

vacant land section 33,

T32S, R43E

address: 13350 Trump Blvd
BARSTOW, CA 92311

10/9/18

Date

Signature of Grantor

Alla Anatolyevna Zorikova

Typed or Printed Name of Grantor

Signature of Grantor

Typed or Printed Name of Grantor

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF

Missouri

COUNTY OF

Camden

On

10/9/18

(Date)

before me,

Jeannine L Evans, Notary Public

(Name and title of the officer)

personally appeared

Alla Anatolyevna Zorikova

(Name of person signing)

who proved to me on the basis of

satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Jeannine L Evans

Signature of officer



JEANNINE L. EVANS
My Commission Expires
October 13, 2020
Camden County
Commission #12529477

(Seal)

* There are various types of deed forms depending on each person's legal status. Before you use this form you may want to consult an attorney if you have questions concerning which document form is appropriate for your transaction.

Exhibit 2

RECORDING REQUESTED BY

Tory Burningham

AND WHEN RECORDED MAIL THIS DEED AND, UNLESS OTHERWISE SHOWN BELOW, MAIL TAX STATEMENT TO:

Name Alla Zorikova

Street Address 279 Quantrill Hollow

City & State Montreal, MO. 65591
Zip

Title Order No.

Escrow No. 011418

Recorded in Official Records, County of San Bernardino

BOB DUTTON
ASSESSOR - RECORDER - CLERK

R Regular Mail

6/28/2018
11:10 AM
FV
SAN

Doc# 2018-0234588



Titles	1	Pages	1
Fees		24.00	
Taxes		2.75	
CA SB2 Fee		0.00	
Others		0.00	
Paid		\$26.75	

SPACE ABOVE THIS LINE FOR RECORDER'S USE

Grant Deed

THE UNDERSIGNED GRANTOR (S) DECLARE (S)

APN: 0502-085-75-0000

DOCUMENTARY TRANSFER TAX IS \$ 2.75

☐ unincorporated area

City of Barstow

☒ computed on full value of interest or property conveyed, or☐ computed on full value less value of liens or encumbrances remaining at time of sale, and

FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged,

Tory J. Burningham 10102 S. Redwood Road, #201 South Jordan, Utah 84095

hereby GRANT(S) to

Alla Zorikova 279 Quantrill Hollow, Montreal, MO. 65591

the following described real property in the

County of San Bernardino

, state of California

The Southwest Quarter of the Southwest Quarter of the Southeast Quarter of Section 33,
Township 32 South, Range 43 East Mount Diablo Meridian

Dated

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF CALIFORNIA

COUNTY OF

Salt Lake

On May 17 2018

before me,

Aubrie Flynn - Notary Public

, notary public, personally appeared

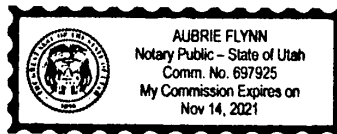
Tory J Burningham

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the state of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal

Signature



(This area for official notarial seal)

MAIL TAX STATEMENTS TO PARTY SHOWN ON FOLLOWING LINE; IF NO PARTY SHOWN, MAIL AS DIRECTED ABOVE

Name

Street Address

City, State & Zip