



~~1.3. Sold hundreds if not thousands of international driver's licenses/permits to consumers without being authorized to do so by the U.S. State Department pursuant to the 1949 Geneva Convention on Motor Traffic<sup>1</sup>;~~

~~1.4. Operated under the name of International Automobile Drivers and conducted business for several years at 5312A Bellaire, in Bellaire, Texas;~~

~~1.5. Taken in several hundreds of thousands of dollars from consumers who paid them for worthless international driver's licenses/permits, mostly in cash;~~

~~1.6. Spent a considerable amount of the money taken in by their sale of driver's permits on travel throughout the U.S., South America and Europe, eating out at restaurants, shopping at stores, and purchasing condominiums to live in;~~

~~1.7. Attempted to dispose of their assets and or placed their assets in the name of Yuliya Frolov to prevent said assets from able to satisfy a potential judgment by the Plaintiff, State of Texas; and~~

~~1.8. Relocated to New York city relatively quickly after discovery of the Plaintiff's investigation and potential suit against them.~~

~~2. Having read the pleadings and having heard and considered the evidence and argument of counsel, the Court finds that Defendant Yuliya Frolov:~~

~~2.1. Knowingly and intentionally allowed assets belonging to Defendants Novikov and Breger to be placed into her name so as to prevent said assets from being able to satisfy a potential judgment by the Plaintiff, State of Texas;~~

<sup>1</sup> Pursuant to this treaty, only the American Automobile Association (AAA) and the American Automobile Touring Alliance are authorized to sell international driver's permits in the U.S.

~~2.2. Was during all relevant times the girlfriend of Defendant Vladlen Breger;~~

~~2.3. Utilized cash assets belonging to Defendant Breger to purchase the condominium and its contents situated at 3505 Sage Road, #906, Houston, Texas;~~

~~2.4. Knowingly allowed Defendant Novikov to place his BMW automobile into Defendant Erolov's name;~~

~~2.5. Testified at the Temporary Injunction hearing both live and via video deposition and that her testimony was not credible, and~~

~~2.6. Has a Compass Bank checking account which currently contains assets belonging to Defendants Breger and Novikov.~~

~~3. It also appears to the Court that Defendants Novikov, Breger and Erolov may seek to conceal and/or continue to dissipate assets purchased from the proceeds of the illegal driver's license scheme; that Defendants Novikov and Breger have placed certain of said assets in Yuliya Frolov's name; that Defendant Breger has sought in the past to avoid paying creditors against him by filing a federal bankruptcy action in New York; that Defendant Novikov and Breger diverted cash from their international automobile driver's business into their own personal bank accounts at Bank of America; that Defendants may have been unjustly enriched, that there is an immediate and irreparable injury to the public at large if Defendants are not immediately enjoined; that Plaintiff has no adequate remedy at law, and that the Plaintiff is likely to succeed on the merits of this case. The Court also finds that if certain assets currently in the name of Defendants are not frozen pending final trial, that said assets are subject to secretion and dissipation by the Defendants which would render the payment of restitution to victims and disgorgement of ill-gotten gains impossible. For these reasons it appears to the Court that Plaintiff is entitled to injunctive relief, including the temporary~~

*The Court finds that all Defendants and Plaintiff are in agreement that this Temporary Injunction be entered. freezing of assets of all Defendants.*

4. IT IS THEREFORE ORDERED that Defendants Aleksandr Novikov and Vladlen Breger, their officers, agents, servants, employees, spouses, relatives, attorneys, and any other persons in active concert or participation with them, including but not limited to Bank of America, N.A.<sup>2</sup>, Washington Mutual<sup>3</sup>, Citibank<sup>4</sup>, Bank One, Midfirst Bank, Deutsche Bank, and Dime Savings Bank of Williamsburgh<sup>5</sup>, holding money in the name and/or for the benefit of the above named Defendants, who receive actual notice of this order by personal service or otherwise, whether acting directly or through any trust, corporation, subsidiary, division, or other devise, shall be restrained from engaging in the following acts or practices:

A. Transferring, spending, hypothecating, concealing, encumbering, withdrawing, removing or allowing the transfer, removal, or withdrawal from any financial institution or from the jurisdiction of this Court any money, stocks, bonds, assets, notes, equipment, funds, accounts receivable, policies of insurance, motor propelled vehicles, water craft, trust agreements, or other property, real, personal or mixed, wherever situated, belonging to or owned by, in the possession or custody of, standing in the name of, or claimed by Defendants, without further order of this court; and

<sup>2</sup> Known Bank of America accounts subject to this order include, but are not limited to the following: Account [redacted] standing in the name of Aleksandr Novikov; and Account [redacted] standing in the name of International Automobile Drivers; and [redacted] standing in the name of Vladlen Breger.

<sup>3</sup> Known Washington Mutual accounts subject to this order include, but are not limited to, the following: Account [redacted] standing in the name of Vladlen Breger.

<sup>4</sup> Known Citibank accounts subject to this order include, but are not limited to: Account [redacted] standing in the name of Aleksandr Novikov.

<sup>5</sup> Defendant, Vladlen Breger is known to have an account here, but the account number(s) are unknown.

*SRB* *WMB*

B. Opening or causing to be opened any safe deposit boxes or storage facilities titled in the name of Defendants or subject to access or control by Defendants.

5. **IT IS FURTHER ORDERED** that Defendants Aleksandr Novikov and Vladlen Breger, their officers, agents, servants, employees, spouses, attorneys and any other persons in active concert or participation with them, who receive actual notice of this order by personal service or otherwise, whether acting directly or through any trust, corporation, subsidiary, division, or other devise, shall be restrained from engaging in the following acts or practices:

A. Transferring, concealing, destroying, or removing from the jurisdiction of this Court any books, records, documents, invoices, papers, or other written or computer generated materials relating to the business of Defendants currently or hereafter in Defendants' possession, custody or control except in response to further orders or subpoenas in this cause;

B. Charging consumers or clients for goods and services which are not in fact provided or performed;

C. Representing, expressly or by implication, that Defendants are legally authorized to issue any type of driver's license or permit;

D. Representing, expressly or by implication, that any governmental body or agency, including the United Nations, sanctions Defendants' goods or services when it does not;

E. Selling, offering, or advertising the sale of any type of driver's permit or license, including, but not limited to, International Driver's Licenses;

F. Representing, expressly or by implication, to any person that possessing an identification card or international driver's license gives or allows one the legal right to drive or operate a motor propelled vehicle in the United States or its territories;



G. Representing to anyone, expressly or by implication, that possessing an identification card sold by the Defendants will aid or assist them in any way;

H. Representing to anyone, expressly or by implication, that the governments of other states or other nations have agreed to accept an International Driver's License or permit as a valid license or permit to drive;

I. Representing to anyone, expressly or by implication, that a license or permit sold by Defendants can legally serve as a substitute for a driver's license when approached by law enforcement officials;

J. Representing to anyone, expressly or by implication, that possessing a license or permit sold by Defendants will effectively erase that person's past driving record;

K. Representing to anyone, expressly or by implication, that a license or permit sold by Defendants is sufficient as a driver's license for the purpose of obtaining automobile insurance;

L. Representing to anyone, expressly or by implication, that automobile insurance companies accept a permit or license sold by Defendants as a valid driver's license;

M. Representing to anyone, expressly or by implication, that possessing an International Driver's license or permit can or will protect someone from arrest, traffic tickets or other law enforcement measures that may be taken against them; and

N. Producing, publishing, or distributing print advertisements, brochures, radio or television commercials, websites or other promotional materials that make any reference to any type of International Driver's License, or driver's license or permit.

6. **IT IS FURTHER ORDERED** that Defendant Yuliya Frolov, her officers, agents, servants, employees, relatives, attorneys and any other persons in active concert or participation with her,



including **Compass Bank**<sup>6</sup> holding money in the name and/or for the benefit of the above named Defendant, who receives actual notice of this order by personal service or otherwise, whether acting directly or through any trust, corporation, subsidiary, division, or other devise, shall be restrained from engaging in the following acts or practices:

A. Transferring, spending, hypothecating, concealing, encumbering, withdrawing, removing or allowing the transfer, removal, or withdrawal from **Compass Bank**, any money, stocks, bonds, assets, notes, or funds without further order of this court.

7. **IT IS FURTHER ORDERED** that Defendant **Yuliya Frolov**, her officers, agents, servants, employees, relatives, attorneys and any other persons in active concert or participation with her, who receives actual notice of this order by personal service or otherwise, whether acting directly or through any trust, corporation, subsidiary, division, or other devise, shall be restrained from engaging in the following acts or practices:

A. Transferring, concealing, destroying, or removing from the jurisdiction of this Court any books, records, documents, invoices, papers, or other written or computer generated materials relating to the business of any of the Defendants currently or hereafter in Defendants' possession, custody or control except in response to further orders or subpoenas in this cause;

B. Transferring, conveying, selling, reducing the value of, or attempting to transfer the real property (condominium) situated at 3505 Sage Road, Unit 906, Houston, Texas;

C. Leasing the property situated at 3505 Sage Road, Unit 906, Houston, Texas, to any person or entity without express written approval from this Court;

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<sup>6</sup> *Known* **Compass Bank** accounts subject to this order include, but are not limited to the following: Account [REDACTED] standing in the name of Yoliya Frolov (a.k.a. Julia Frolov).

D. Transferring, moving, selling, conveying, giving, damaging, reducing the value of, or removing any of the personal property and personal effects previously belonging to Vladlen Breger which are contained in the condominium situated at 3505 Sage Road, Unit 906, Houston, Texas;

E. Selling, conveying, transferring, or allowing anyone other than Julia Frolov to drive, operate, move, or store the BMW automobile (VIN# WBAGJ8320VDL42777) purchased from Defendant Novikov; and

F. Transferring, selling, conveying, concealing, moving, or removing any property purchased from Defendants Breger and/or Novikov, or owned by or held for Defendants Breger and Novikov without further order of this court.

8. **IT IS FURTHER ORDERED** that Defendants Aleksandr Novikov and Yuliya Frolov return the BMW automobile (VIN# WBAGJ8320VDL42777) to Houston, Texas on or before June 1, 2003, to be stored thereafter at 3505 Sage Road, during the pendency of this suit.

#### OTHER ORDERS

9. **IT IS FURTHER ORDERED** that, no bond being required on the part of the Plaintiff, the State of Texas, this Temporary Injunction shall issue and become effective immediately.

10. **IT IS FURTHER ORDERED** that upon 15 days notice to Defendant Frolov's counsel, counsel for Plaintiff shall have the right and opportunity to send its designee to the condominium situated at 3505 Sage Road, Unit 906, Houston, Texas, to inspect, photocopy, video the personal property situated therein<sup>7</sup>.

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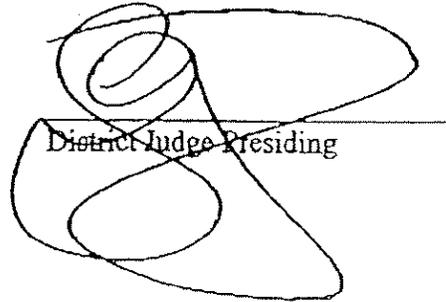
<sup>7</sup> This inspection is limited to viewing and taking video and/or pictures of the basic layout of the condominium and not to physically inspect or "search" the insides of the furniture or appliances situated in the condominium.



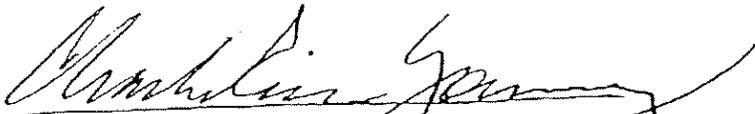
11. Final trial in this matter is set for the 6<sup>th</sup> day of October, 2003.

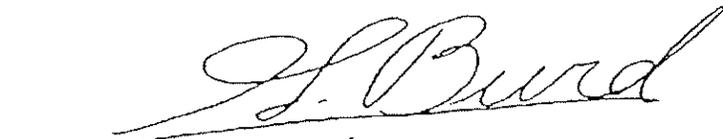
12. The court notes that a Rule 11 agreement was dictated on the record on this date regarding interim payments on the 3805 Sage Road Condominium & regarding Charles Young's ability to seek fees & living expenses.  
SIGNED at Houston, Harris County, Texas on this the \_\_\_\_\_ day of his clerk

APR 22 2003 of 2003, at 11:00 o'clock, a.m.

  
District Judge Presiding

Agreed:

  
Charles Rice Young  
Attorney for Vladlen Blyudov & Alexandr Novikov

  
Gene Burd  
Attorney for Yuliya Frolov

  
John Owens  
Attorney for Plaintiff,  
State of Texas

