

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT,
IN AND FOR SEMINOLE COUNTY, FLORIDA

ALEX ABRAMS
Plaintiff,

CASE NO.:2015 CA 001740

vs.

JUDITH A. GUMBRECHT a/k/a
JUDITH ANN GUMBRECHT a/k/a
JUDITH A. DELUCENAY a/k/a JUDITH
A. MARTIN a/k/a GODDESS JUDE and
I.D.O. MANAGEMENT, INC., a Florida
Corporation

Defendants.

THE STATE OF FLORIDA:
To Each Sheriff of the State:

YOU ARE HEREBY COMMANDED to serve this Summons and Complaint on:

**I.D.O. MANAGEMENT, INC.
c/o LAWRENCE WALTERS, ESQ. REGISTERED AGENT
195 W. PINE AVE.
LONGWOOD, FL 32750-4104**

Each defendant is hereby required to serve written defenses to the Complaint or petition on **Brian M. Mark, Esquire, Mark & Brown, P.A., Plaintiff's attorney, whose address is 5728 Major Blvd., Ste. 502, Orlando, FL 32819** within 20 days after service of this summons on that defendant, exclusive of the day of service, and to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that defendant for the relief demanded in the complaint or petition.

Dated on August 3, 2015.

Maryanne Morse
Clerk of the Court
& Comptroller



By _____

Deputy Clerk

(COURT SEAL)

NOTIFICATION: IF YOU ARE A PERSON WITH A DISABILITY WHO NEEDS ANY ACCOMMODATION IN ORDER TO PARTICIPATE IN THIS PROCEEDING, YOU ARE ENTITLED, AT NO COST TO YOU, TO THE PROVISION OF CERTAIN ASSISTANCE. PLEASE CONTACT COURT ADMINISTRATION AT 2 COURTHOUSE SQUARE, KISSIMMEE, FLORIDA 34741. TELEPHONE: (407) 343-2421 WITHIN TWO (2) WORKING DAYS OF YOUR RECEIPT OF THIS NOTICE. IF YOU ARE HEARING OR VOICE IMPAIRED CALL 1-800-955-8771.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene veinte (20) días contados, a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá; si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas en dicho caso. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser desojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante)

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger; vous êtes obligé de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le Tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite le délai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du Tribunal. Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez téléphoner à un service de référence d'avocats ou à un bureau d'assistance juridique (figurant à l'annuaire de téléphones).

Si vous choisissez de déposer vous-même une réponse écrite, il vous faudra également, en même temps que cette formalité, faire parvenir ou expédier une copie au carbone ou une photocopie de votre réponse écrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou à son avocat) nommé ci-dessous.

Brian M. Mark, Esq.
FBN: 134207
Mark & Brown, P.A.
5728 Major Blvd., Ste. 502
Orlando, FL 32819
Tel: (407) 932-3933
Fax: (407) 932-3965
Attorney for Plaintiff

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT,
IN AND FOR SEMINOLE COUNTY, FLORIDA

ALEX ABRAMS

Plaintiff,

CASE NO.: _____

vs.

JUDITH A. GUMBRECHT a/k/a
JUDITH ANN GUMBRECHT a/k/a
JUDITH A. DELUCENAY a/k/a JUDITH
A. MARTIN a/k/a GODDESS JUDE and
I.D.O. MANAGEMENT, INC., a Florida
Corporation

Defendants.
_____ /

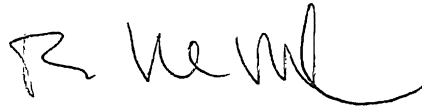
NOTICE OF LIS PENDINS

TO THE ABOVE NAMED DEFENDANTS, AND ALL OTHERS WHOM IT MAY CONCERN:
YOU ARE NOTIFIED OF THE FOLLOWING:

YOU ARE NOTIFIED of the institution of this action against you by the
Plaintiff, **ALEX ABRAMS**, seeking to avoid a transfer regarding the following
described real property:

Lot 5, Block Q, STERLING PARK, UNIT 14, according to the map or plat
thereof, as recorded in Plat Book 20, Page 82, of the Public Records of Seminole
County, Florida.

Date: 7/20/2015



Brian M. Mark, Esq.

FBN.: 134207

Billy J. Brown, Esq.

FBN.: 50405

MARK & BROWN, P.A.

5728 Major Blvd., Ste. 502

Orlando, FL 32819

Tel.: 407-932-3933

Fax: 407-932-3965

Attorneys for Plaintiff

Service Email Pursuant to Rule 2.516: eservice@marklawfirm.com

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT,
IN AND FOR SEMINOLE COUNTY, FLORIDA

ALEX ABRAMS

Plaintiff,

CASE NO.: _____

VS.

JUDITH A. GUMBRECHT a/k/a
JUDITH ANN GUMBRECHT a/k/a
JUDITH A. DELUCENAY a/k/a JUDITH
A. MARTIN a/k/a GODDESS JUDE and
I.D.O. MANAGEMENT, INC., a Florida
Corporation

Defendants.
_____ /

VERIFIED COMPLAINT

COMES NOW the Plaintiff, ALEX ABRAMS and sues Defendant, JUDITH A. GUMBRECHT a/k/a JUDITH ANN GUMBRECHT a/k/a JUDITH A. DELUCENAY a/k/a JUDITH A. MARTIN a/k/a GODDESS JUDE and I.D.O. MANAGEMENT, INC., a Florida Corporation and alleges the following:

PARTIES

1. Plaintiff ALEX ABRAMS ("ABRAMS") is a resident of the State of Florida, County of Orange, is over the age of 18 years and is otherwise sui juris.
2. Defendant JUDITH A. GUMBRECHT a/k/a JUDITH ANN GUMBRECHT a/k/a JUDITH A. DELUCENAY a/k/a JUDITH A. MARTIN a/k/a GODDESS JUDE is a resident of Orange County, Florida, is over the age of 18 years and is otherwise sui juris.
3. Defendant, I.D.O. MANAGEMENT, INC., is an active Florida Corporation registered as a "for profit" corporation with its principal address is 2423 S. Orange

Ave. #186, Orlando, FL 32806, which does business under the Fictitious Name "GODDESS JUDE." Defendant GUMBRECHT is the principal shareholder of I.D.O. MANAGEMENT, INC.

JURISDICTION AND VENUE

4. The Plaintiff is seeking relief under Florida Statute 825 which deals with exploitation of individuals who are sixty (60) years or older.

5. The exploitation, in part, involves the fraudulent transfer of real property located in Seminole County, Florida.

BACKGROUND FACTS

6. During a period of time beginning in 2011, ABRAMS and GUMBRECHT entered into a sadomasochistic relationship wherein ABRAMS was the submissive and GUMBRECHT was the dominatrix.

7. At the time ABRAMS met GUMBRECHT, he was 63 years of age, had gone through a recent divorce which ended a marriage of 32 years and was living alone.

8. It has been subsequently discovered that during the enter period of the relationship between ABRAMS AND GUMBRECHT, ABRAMS was suffering from severe clinical depression. ABRAMS has been diagnosed with a dementia condition, unspecified and Alzheimer's disease superimposed on a history of ADHAD and anxiety and at all times relevant to this complaint was impaired by reason of physical and mental illness, and was unable to make reasonable decisions regarding the ownership and/or disposition of his property.

9. GUMBRECHT capitalized on ABRAMS' age, medical and mental disabilities, and used their sadomasochistic relationship for the purpose of exploiting ABRAMS.

10. GUMBRECHT is a professional Dominatrix, and GUMBRECHT together with I.D.O, do business under the fictitious name "GODDESS JUDE." She advised ABRAMS that it was of the *highest honor* to be her *financial slave*. GUMBRECHT used her sexual relationship with ABRAMS to convince him that financial slavery would be a level of servitude that would bring her the most pleasure.

11. As a result of this exploitation, ABRAMS opened new joint financial accounts with GUMBRECHT and made GUMBRECHT an authorized user on his credit card accounts. Upon being named as a joint owner and/or authorized user, GUMBRECHT continued to *reward* ABRAMS with sexual favors. If ABRAMS failed to adhere to financial requirements and/or instructions of GUMBRECHT, ABRAMS would be punished.

12. In 2013, GUMBRECHT accompanied ABRAMS to an appointment with his neuropsychology and psychotherapist. At that appointment, ABRAMS received a diagnosis of a dementia condition, unspecified, which could also represent early Alzheimer's disease together with a history of ADHD and anxiety.

13. Notwithstanding this diagnosis, and fully aware of ABRAMS diminished capacity, GUMBRECHT persuaded ABRAMS to transfer real property and large sums of money to GUMBRECHT.

14. On or about May 9, 2014, ABRAMS transferred real property located at 230 Springwind Way, Casselberry, FL 32707 to GUMBRECHT via a Warranty Deed

recorded in the Office of the Seminole County Clerk of Court in Book 8261 at Pages 946-947.

15. Over the course of the relationship between ABRAMS and GUMBRECHT, GUMBRECHT took money and used credit of ABRAMS totaling more than \$500,000.00.

**COUNT I – ABUSE, NEGLECT AND
EXPLOITATION OF AN ELDERLY PERSONS**

16. ABRAMS re-alleges and incorporates herein paragraphs numbered 1 through 15, as if the same had been set forth herein.

17. Fla. Stat. §825.103 ("Exploitation") provides, in part:

- (1) *"Exploitation of an elderly person or disabled adult" means:*
 - (a) *Knowingly obtaining or using, or endeavoring to obtain or use, an elderly person's or disabled adult's funds, assets, or property with the intent to temporarily or permanently deprive the elderly person or disabled adult of the use, benefit, or possession of the funds, assets, or property, or to benefit someone other than the elderly person or disabled adult; by a person who:*
 - (1) *Stands in a position of trust and confidence with the Elderly person or disabled adult; or*
 - (2) *Has a business relationship with the elderly person or disability adult.*

18. GUMBRECHT used her relationship with ABRAMS to create a relationship of trust and confidence, and used that relationship to exploit ABRAMS.

19. Pursuant to §825.103(3)(a), it is a first degree felony if the property, funds, assets or property is valued at \$50,000 or more.

20. On or about May 6, 2015, ABRAMS presented GUMBRECHT a formal written demand under Fla. Stat. §772.11 for either the prompt return of ABRAMS' property or payment to ABRAMS for the full value of funds, property and assets. A

copy of the Demand Letter, marked "Exhibit A" is attached hereto and made a part hereof.

21. More than thirty (30) days has passed prior to bringing this action. ABRAMS' demanded return of his real property and money, and GUMBRECHT has failed and refused to return same. GUMBRECHT responded to ABRAMS demand by threatening to expose and embarrass ABRAMS by disclosing their prior relationship to ABRAMS' adult children. GUMBRECHT is still in possession of ABRAMS' funds, assets or property.

22. As a direct and proximate cause of Defendants' actions, ABRAMS has suffered damages.

23. ABRAMS has retained the services of the law firm of MARK & BROWN P.A. to represent him in this action, and has agreed to pay said law firm a reasonable fee for their services.

WHEREFORE, ABRAMS demands judgment against GUMBRECHT for damages, including the return of real property, a monetary award, treble damages and an award of attorneys' fees and costs pursuant to Fla. Stat. §772.11, and such other and further relief as this court shall find just and proper.

COUNT II – CIVIL THEFT

24. ABRAMS re-alleges and incorporates herein paragraphs 1 through 15 as though the same had been set forth in detail herein, and further alleges:

25. Fla. Stat. §812.014 ("Theft") provides, in part:

- (1) *A person commits theft if he or she knowingly obtains or uses, or endeavors to obtain or to use, the property of another with intent to, either temporarily or permanently:*
 - (a) *Deprive the other person of a right to the property or a benefit from the property.*
 - (b) *Appropriate the property to his or her own use or*

the use of any person not entitled to the use of the property.

26. Pursuant to §812.014(2)(a), it is a first degree felony if the property stolen is valued at \$100,000 or more.

27. Fla. Stat. §772.11 ("Civil Remedy for theft or exploitation") provides, in pertinent part:

Any person who proves by clear and convincing evidence that he or she has been injured in any fashion by reason of any violation of §§ 812.012-812-037 or §825.103(1) has a cause of action for threefold the actual damages sustained and, in any such action, is entitled to minimum damages in the amount of \$200, and reasonable attorney's fees and courts costs in the trial and appellate courts. Before filing an action for damages under this section, the person claiming injury must make a written demand for \$200 or the treble damage amount of the person liable for damages under this section. If the person to whom a written demand is made complies with such demand within 30 days after receipt of the demand, that person shall be given a written release from further civil liability for the specific act of theft or exploitation by the person making the written demand.

28. As set forth above, ABRAMS has been injured by Defendants' violation of Fla. Stat. §812.014, et seq.

29. Defendants knowingly obtained or used, or endeavored to obtain or use, ABRAMS' property with "felonious intent", either temporarily or permanently, to deprive ABRAMS of his right to or a benefit from the property or appropriate the property of ABRAMS to Defendants' own use or the use of any person not entitled to the property.

30. On or about May 6, 2015, ABRAMS presented GUMBRECHT a formal written demand under Fla. Stat. §772.11 for either the prompt return of ABRAMS'

property or payment to ABRAMS for the full value of that property. Attached herewith and made a part hereof as Exhibit "A" is a copy of said Demand Letter.

31. As of the date of filing of this lawsuit, this is more than thirty days after the date of the demand, ABRAMS' demands of delivery of his property has not been effectuated by Defendants. Rather, GUMBRECHT took the opportunity to threaten to expose ABRAMS to embarrass and/or cause harm to the nurturing relationship he has with his children. Defendants are still in possession of ABRAMS' property.

32. As a direct and proximate cause of Defendants' actions, ABRAMS has suffered damages.

33. Pursuant to Fla. Stat. §772.11, ABRAMS is entitled to recover from Defendants three times the current monetary value in compensatory damages for which Defendants would otherwise be liable.

34. Pursuant to Fla. Stat. §772.11, ABRAMS is entitled to recover from Defendants a reasonable amount of attorneys' fees ABRAMS has incurred in representing his interest in this matter.

WHEREFORE, ABRAMS demands entry of a judgment against Defendants for damages, treble damages, and an award of interest and an award of attorneys' fees and costs pursuant to Fla. Stat. §772.11, and such other and further relief as this court shall find just and proper.

COUNT III - UNJUST ENRICHMENT

35. ABRAMS re-alleges and incorporates herein paragraphs numbered 1 through 15 as though the same had been set forth in detail herein, and further alleges:

36. ABRAMS has conferred a benefit on GUMBRECHT money and real property located at 230 Springwind Way, Casselberry, FL 32707, more particularly described as: Lot 5, Block Q, STERLING PARK, UNIT 14, according to the map or plat thereof, as recorded in Plat Book 20, Page 82, of the Public Records of Seminole County, Florida, parcel identification number: 22-21-30-502-0Q00-0050.

37. GUMBRECHT has knowledge of the benefit that was conferred to her.

38. GUMBRECHT has accepted and retained the benefits conferred.

39. The circumstances are such that it would be inequitable for GUMBRECHT to retain title to said property.

WHEREFORE, ABRAMS demands entry of an order voiding the transfer of the real property, together with such other and further relief as this court shall find just and proper.

COUNT IV – CONVERSION

40. ABRAMS re-alleges and incorporates herein paragraphs numbered 1 through 15 as though the same had been set forth in detail herein, and further alleges:

41. As set forth in paragraphs 1 through 15, GUMBRECHT converted to her own use funds and assets belonging to ABRAMS.

42. GUMBRECHT obtained and/or received money and real property located at 230 Springwind Way, Casselberry, FL 32707, more particularly described as: Lot 5, Block Q, STERLING PARK, UNIT 14, according to the map or plat thereof, as recorded in Plat Book 20, Page 82, of the Public Records of Seminole County, Florida, parcel identification number: 22-21-30-502-0Q00-0050.

43. ABRAMS may move to amend this Count to assert a claim for punitive damages as allowed by §768.72, Fla.R.Civ.P.

Fla. Stat. §825.103 ("Exploitation") provides, in part:

- (1) *"Exploitation of an elderly person or disabled adult" means:*
 - (a) *Knowingly obtaining or using, or endeavoring to obtain or use, an elderly person's or disabled adult's funds, assets, or property with the intent to temporarily or permanently deprive the elderly person or disabled adult of the use, benefit, or possession of the funds, assets, or property, or to benefit someone other than the elderly person or disabled adult; by a person who:*
 - (1) *Stands in a position of trust and confidence with the Elderly person or disabled adult; or*
 - (2) *Has a business relationship with the elderly person or disability adult.*

44. As set forth above, Plaintiff ABRAMS has been injured by Defendants' violation of Fla. Stat. §825.103, *et seq.*

45. Defendants knowingly obtained or used, or endeavored to obtain or use, Plaintiff ABRAMS' property either temporarily or permanently, to deprive Plaintiff ABRAMS of his right to or a benefit from the property and funds or appropriate the property and funds of Plaintiff ABRAMS to Defendants' own use or the use of any person not entitled to the property and funds.

46. Pursuant to §825.103(3)(a), it is a first degree felony if the property, funds, assets or property is valued at \$50,000 or more.

47. On or about May 6, 2015, Plaintiff ABRAMS presented GUMBRECHT a formal written demand under Fla. Stat. §772.11 for either the prompt return of Plaintiff ABRAMS' property or payment to Plaintiff ABRAMS for the full value of

funds, property and assets. Attached herewith and made a part hereof as Exhibit "A" is a copy of said Demand Letter.

48. As of the date of filing of this lawsuit, this is more than thirty days after the date of the demand, Plaintiff ABRAMS' demands of delivery of his property has not been effectuated by Defendants. Rather, GUMBRECHT took the opportunity to threaten to expose Plaintiff ABRAMS to embarrass and/or cause harm to the nurturing relationship he has with his children. Defendants are still in possession of Plaintiff ABRAMS' funds, assets or property.

49. As a direct and proximate cause of Defendants' actions, Plaintiff ABRAMS has suffered damages.

WHEREFORE, Plaintiff ABRAMS demands entry of a judgment against Defendant for damages, treble damages and an award of interest and attorneys' fees and costs pursuant to Fla. Stat. §772.11, together with such other and further relief as this court shall find just and proper.


DEMAND FOR JURY TRIAL

ABRAMS demands trial by jury in this action of all issues so triable.

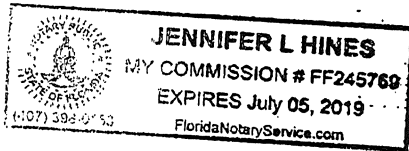
VERIFICATION

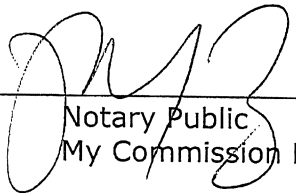
STATE OF FLORIDA)
) ss.
COUNTY OF ORANGE)

BEFORE ME, the undersigned authority, personally appeared ALEX ABRAMS, who after identifying himself by means of his Florida Drivers' License, and being first duly sworn, deposes and swears that the facts contained in the foregoing Verified Complaint are true and correct to the best of his knowledge.

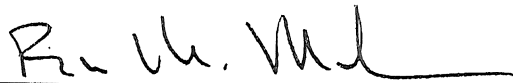

ALEX ABRAMS

SWORN TO AND SUBSCRIBED before me this 20th day of July, 2015.




Notary Public
My Commission Expires:

Respectfully submitted,



Brian M. Mark, Esq.
FBN.: 134207
Billy J. Brown, Esq.
FBN.: 50405

MARK & BROWN, P.A.
5728 Major Blvd., Ste. 502
Orlando, FL 32819
Tel.: 407-932-3933
Fax: 407-932-3965
Attorneys for Plaintiff

Service Email Pursuant to Rule 2.516: eservice@marklawfirm.com



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(407)932-3965

Website: markandbrown.com

**PLEASE NOTE: THIS LETTER HAS BEEN SENT TO THE ADDRESSEE BY BOTH CERTIFIED
AND REGULAR U.S. MAIL.**

May 6, 2015

Ms. Judith A. Delucenay a/k/a
Judith Ann Gumbrecht; f/k/a
Judith A. Martin

Re: Alex Abrams

Dear Ms. Delucenay:

The undersigned represents Mr. Alex Abrams. Mr. Abrams has informed the undersigned that for a period of approximately five (5) years you had a sadomasochistic relationship with Mr. Abrams wherein you acted as a dominatrix. Through this relationship, you received from our client money and property with a total value of approximately \$500,000.00.

It is the opinion of the undersigned that your actions violated Florida Statute, Chapter 825 whereby you have exploited an elderly person. Pursuant to Florida Statute 772.11 demand is hereby made for the return of all cash, charge account credits, real and personal property and any and all other tangible and intangible property you received either directly or indirectly from Mr. Abrams during the last five (5) years. Please be aware that under Florida law you may be liable for treble damages, attorney fees and court costs.

PLEASE BE ADVISED ACCORDINGLY.

Very Truly Yours,

Mark & Brown P.A.

Brian M. Mark, Esquire
BMM/lf

cc: Alex Abrams

