

IN THE DISTRICT COURT OF DOUGLAS COUNTY, KANSAS

THE BOARD OF COUNTY COMMISSIONERS OF DOUGLAS COUNTY, KANSAS,	)	
	)	
Plaintiff,	)	Case No. _____
vs.	)	Div. No. _____
	)	
MICHAEL AMICK, Cause No. 1	)	
ATLANTIC CREDIT & FINANCE SPECIAL FINANCE UNIT, LLC, ASSIGNEE OF CITIBANK, N.A., Cause No. 1	)	<b>Title to Real Estate Involved</b>
JOHN DOE #1, Cause No. 1	)	
COMPLETE ACQUISITION OF LAWRENCE, LLC, Cause No. 2	)	
JOHN DOE #2, Cause No. 2	)	
EBRPH LLC, Cause No. 3	)	
EMPRISE BANK, Cause No. 3	)	
EBRPH LLC, Cause No. 4	)	
EMPRISE BANK, Cause No. 4	)	
EBRPH LLC, Cause No. 5	)	
EMPRISE BANK, Cause No. 5	)	
EBRPH LLC, Cause No. 6	)	
EMPRISE BANK, Cause No. 6	)	
EBRPH LLC, Cause No. 7	)	
EMPRISE BANK, Cause No. 7	)	
SCOT J. HAMLIN, Cause No. 8	)	
JOHN DOE #3, Cause No. 8	)	
KDL, INC., Cause No. 9	)	
EMPRISE BANK, Cause No. 9	)	
JOHN DOE #4, Cause No. 9	)	
JJ KRUM, Cause No. 10	)	
JOHN ALLAN KRUM, Cause No.10	)	
JOHN ALLAN KRUM, Cause No. 11	)	
PAMELA S. MARTINEZ, Cause No. 12	)	
JOHN D. MARTINEZ, Cause No. 12	)	
STATE OF KANSAS, DEPARTMENT OF REVENUE, Cause No. 12	)	
JOHN DOE #5, Cause No. 12	)	
JOSEPH STARR. PRICE, Cause No. 13	)	
MICHAEL WILLIAM PRICE, Cause No. 13	)	
ANGELA D. SMITH, Cause No. 14	)	
TRAVIS S. SMITH, Cause No. 14	)	
ED STRODA, Cause No. 15	)	
CAULETAUS N. STRODA, Cause No. 15	)	
EDMOND PAUL STRODA, JR. Cause No. 15	)	
LAWRENCE P. STRODA II, Cause No. 15	)	
VICKI D. STRODA-SMITH, Cause No. 15	)	
SHERRY L. CHAPPELL-DICKENS, Cause No. 15	)	
ED STRODA, Cause No. 16	)	
CAULETAUS N. STRODA, Cause No. 16	)	
EDMOND PAUL STRODA, JR. Cause No. 16	)	
LAWRENCE P. STRODA II, Cause No. 16	)	
VICKI D. STRODA-SMITH, Cause No. 16	)	
SHERRY L. CHAPPELL-DICKENS, Cause No. 16	)	
DAVID R. THEEL, Cause No. 17	)	
JUDY K. THEEL, Cause No. 17	)	

and the unknown heirs, executors, administrators, devisees,  
trustees, creditors, and assigns of such of the defendants as may  
be deceased; the unknown spouses of any defendant, the unknown  
officers, successors, trustees, creditors, and assigns of a defendant  
that is an existing, dissolved or dormant corporation; the unknown  
executors, administrators, devisees, trustees, creditors, successors  
and assigns of a defendant that is or was in partnership; the unknown  
tenants of any of the defendants herein possessing any part of the real  
estate in controversy herein; and the unknown guardians, conservators  
and trustees of a defendant that is a minor or is under a legal disability;  
and all other persons who are or may be concerned,

Defendants.

Pursuant to K.S.A. Chapter 60 and K.S.A. 79-2801 *et. seq.*

### **PETITION**

Plaintiff, Board of County Commissioners of Douglas County, Kansas, files this Petition with its several causes of action against the above named Defendants, and states as follows:

1. The County of Douglas is a duly organized and existing county of the State of Kansas, and the Board of County Commissioners of Douglas County, Kansas is authorized by law to sue on behalf of the said County of Douglas. A resolution, heretofore adopted by Plaintiff pursuant to K.S.A. 79-2801, as amended, authorized the institution of this proceeding to foreclose tax liens against real property described in this Petition.

2. The County of Douglas is a municipality as defined in K.S.A. 12-105a, and amendments thereto, and is exempt from depositing court costs or paying docket fees in this matter under K.S.A. 60-2005.

3. All requirements of law pertaining to assessment, levy, taxation, notice, publication and proof thereof, sale and purchase in the name of Douglas County, Kansas, as prescribed by K.S.A. 79-2301, *et seq.*, and every other condition precedent to judicial foreclosure of tax liens, have been performed and satisfied. The taxes and special assessments have not been paid as required by law, and all the within described real estate is subject to judicial foreclosure and sale for delinquent taxes and special assessments pursuant to K.S.A. 79-2801, *et seq.*

4. Each tract, lot or piece of real estate hereinafter listed in each cause of action were fully assessed for taxation in said county and taxes were duly levied on each tract, lot or piece of real estate thereof for the years preceding the date of sale as stated in each cause of action.

5. The persons named as Defendants herein are owners and supposed owners, and persons having or claiming to have an interest in the real estate described herein, so far as Plaintiff is able to ascertain, but the exact nature of such ownership and interest is unknown to Plaintiff.

6. Plaintiff's lien is for unpaid taxes and special assessments on the real estate described herein and is first and prior to liens and claims of all of the Defendants herein, including the unknown members of the classes set forth in the caption hereof. Plaintiff is unable to allege in greater detail the nature or extent of the claims of any of the Defendants, and is unable to allege which, if any, of the Defendants may be dead, and which, if any of the corporate Defendants may be dissolved, and in the event of such death or dissolution, the Plaintiff is unable to allege the names of the heirs, executors, administrators, devisees, trustees, conservators, and assigns, if any, of the decedent or the successor trustees, and assigns of any dissolved corporation or the whereabouts of any of said persons, except as alleged herein. Plaintiff respectfully requests that each Defendant and those claiming under or through any of the Defendants herein, be required to appear and assert what interest, if any, they or any of them have or claim to have in and to any of the real estate described herein so that all claims, estates, interest and title may be determined by the decrees of this Court and so that the Plaintiff's tax lien herein may be foreclosed against each parcel of real estate and adjudged to be a good, valid and perfect first and prior lien upon such parcel.

7. Plaintiff is entitled to a decree of this Court determining the amount of taxes, special assessments, charges, interest, and penalties chargeable to each particular tract, lot and piece of real estate in such amount as the Court shall determine, and to a judgment for costs herein apportioned against each tract, lot and piece of real estate and to judgment for charges herein, and for judgment determining the owner or parties having an interest herein, and to a decree adjudging the amount so found to be due to be a first and prior lien upon each tract, lot or piece of real estate described herein

and for an order directing that each tract, lot or piece of real estate be sold at public sale for the satisfaction of each lien and for other necessary relief.

8. Each tract, lot or piece of real estate described in the following Causes was bid off and sold by the Douglas County Treasurer at a delinquent tax sale on the first Tuesday of September, 2013 following publication, as provided by law for delinquent taxes for 2012, and remained unredeemed on September 3rd of the third year after such sale.

9. The description of each tract, lot or piece of real estate, the street number or location, if applicable, the amount of taxes, special assessments, charges, interest, and penalties chargeable to each tract, lot or piece of real estate, the names of the owners, supposed owner, and any party having or claiming any interest therein or thereto, and the year the real estate was sold for delinquent taxes under the provisions of K.S.A. 79-2302 are as follows:

*[causes of action with respect to each separate tract, lot or piece of real estate to follow]*

**CAUSE NO. 1**

Plaintiff, for this cause of action, incorporates Paragraphs 1 through 9 by reference and additionally states and alleges that the following described real estate is subject to judicial foreclosure; that the amount of taxes, interest, and fees due are as follows; that the presale statutory costs are as follows; and that the owners and supposed owners and parties having an interest in the real estate are as follows:

Tax AIN #:	U04201
Situs Address:	1846 NEW HAMPSHIRE ST, LAWRENCE, KS 66044
Legal Description:	Lot 3, in B. F. Smith's Subdivision of Lots 16, 17, 18 and 19, in Block 15 of Babcock's Enlarged Addition to the City of Lawrence, and of Lots 12 and 13, in Block 3 of Cranson's Subdivision of Block 15 of Babcock's Enlarged Addition to the City of Lawrence, in Douglas County, Kansas.

The taxes for the years 2012, 2013, 2014, 2015, and 2016 are delinquent. The amount of delinquent and currently due taxes, penalties, and interest chargeable to said described property as of October 6, 2017, as far as can be practically ascertained, are: **\$15,981.92**

The Presale Statutory Costs are: \$322.00

The name of the owner of said property is: **MICHAEL AMICK**

The following parties claim some interest to the parcel of real estate, the extent of which is unknown by the Plaintiff:

1. **Atlantic Credit & Finance Special Finance Unit, LLC, Assignee of Citibank, N.A.**, including but not limited to, a judgment lien with respect to Douglas County Case No. 2014-CV-169 in the principal amount of \$7,390.76, plus interest and costs, filed September 11, 2014.
2. **John Doe #1**, including but not limited to, any claims as a tenant of the subject property.

**CAUSE NO. 2**

Plaintiff, for this cause of action, incorporates Paragraphs 1 through 9 by reference and additionally states and alleges that the following described real estate is subject to judicial foreclosure; that the amount of taxes, interest, and fees due are as follows; that the presale statutory costs are as follows; and that the owners and supposed owners and parties having an interest in the real estate are as follows:

Tax AIN #: U10086  
Situs Address: 1711 W 21ST TER, LAWRENCE, KS 66046  
Legal Description: Lot 3, and the East 7 feet of Lot 4, Block 2, Southwest Addition No. 6, an Addition to the City of Lawrence, Douglas County, Kansas.

The taxes for the years 2012, 2013, 2014, 2015, and 2016 are delinquent. The amount of delinquent and currently due taxes, penalties, and interest chargeable to said described property as of October 6, 2017, as far as can be practically ascertained, are: **\$11,568.43**

The Presale Statutory Costs are: \$322.00

The name of the owner of said property is: **COMPLETE ACQUISITION OF LAWRENCE LLC**

The following parties claim some interest to the parcel of real estate, the extent of which is unknown by the Plaintiff:

1. **John Doe #2**, including but not limited to, any claims as a tenant of the subject property.

**CAUSE NO. 3**

Plaintiff, for this cause of action, incorporates Paragraphs 1 through 9 by reference and additionally states and alleges that the following described real estate is subject to judicial foreclosure; that the amount of taxes, interest, and fees due are as follows; that the presale statutory costs are as follows; and that the owners and supposed owners and parties having an interest in the real estate are as follows:

Tax AIN #: U18530-009A

Situs Address: 2530 EXCHANGE PL, LAWRENCE, KS 66046

Legal Description: Lot 2, Block 1, A Final Plat of Fairfield East Addition No. 1, a Replat of Fairfield Farms East Addition No. 2, in the City of Lawrence, Douglas County, Kansas.

The taxes and special assessments for the years 2012, 2013, 2014, 2015, and 2016 are delinquent. The amount of delinquent and currently due taxes, special assessments, penalties, and interest chargeable to said described property as of October 6, 2017, as far as can be practically ascertained, are: **\$109,477.23**

The Presale Statutory Costs are: \$322.00

The name of the owner of said property is: **EBRPH, LLC**

The following parties claim some interest to the parcel of real estate, the extent of which is unknown by the Plaintiff:

1. **Emprise Bank**, including but not limited to, a claim pursuant to a mortgage to secure an original principal indebtedness of \$3,025,000.00, and any other amounts or obligations secured thereby, dated July 25, 2012, and recorded July 26, 2012, in Book 1090, Page 149.

**CAUSE NO. 4**

Plaintiff, for this cause of action, incorporates Paragraphs 1 through 9 by reference and additionally states and alleges that the following described real estate is subject to judicial foreclosure; that the amount of taxes, interest, and fees due are as follows; that the presale statutory costs are as follows; and that the owners and supposed owners and parties having an interest in the real estate are as follows:

Tax AIN #:	U18530-002
Situs Address:	2460 EXCHANGE PL, LAWRENCE, KS 66046
Legal Description:	Lot 3, Block 1, A Final Plat of Fairfield East Addition No. 1, a Replat of Fairfield Farms East Addition No. 2, in the City of Lawrence, Douglas County, Kansas.

The taxes and special assessments for the years 2012, 2013, 2014, 2015, and 2016 are delinquent. The amount of delinquent and currently due taxes, special assessments, penalties, and interest chargeable to said described property as of October 6, 2017, as far as can be practically ascertained, are: **\$107,403.07**

The Presale Statutory Costs are: \$322.00

The name of the owner of said property is: **EBRPH, LLC**

The following parties claim some interest to the parcel of real estate, the extent of which is unknown by the Plaintiff:

1. **Emprise Bank**, including but not limited to, a claim pursuant to a mortgage to secure an original principal indebtedness of \$3,025,000.00, and any other amounts or obligations secured thereby, dated July 25, 2012, and recorded July 26, 2012, in Book 1090, Page 149.

**CAUSE NO. 5**

Plaintiff, for this cause of action, incorporates Paragraphs 1 through 9 by reference and additionally states and alleges that the following described real estate is subject to judicial foreclosure; that the amount of taxes, interest, and fees due are as follows; that the presale statutory costs are as follows; and that the owners and supposed owners and parties having an interest in the real estate are as follows:

Tax AIN #: U18530-003

Situs Address: 2430 EXCHANGE PL, LAWRENCE, KS 66046

Legal Description: Lot 4, Block 1, A Final Plat of Fairfield East Addition No. 1, a Replat of Fairfield Farms East Addition No. 2, in the City of Lawrence, Douglas County, Kansas.

The taxes and special assessments for the years 2012, 2013, 2014, 2015, and 2016 are delinquent. The amount of delinquent and currently due taxes, special assessments, penalties, and interest chargeable to said described property as of October 6, 2017, as far as can be practically ascertained, are: **\$107,403.07**

The Presale Statutory Costs are: \$322.00

The name of the owner of said property is: **EBRPH, LLC**

The following parties claim some interest to the parcel of real estate, the extent of which is unknown by the Plaintiff:

1. **Emprise Bank**, including but not limited to, a claim pursuant to a mortgage to secure an original principal indebtedness of \$3,025,000.00, and any other amounts or obligations secured thereby, dated July 25, 2012, and recorded July 26, 2012, in Book 1090, Page 149.

**CAUSE NO. 6**

Plaintiff, for this cause of action, incorporates Paragraphs 1 through 9 by reference and additionally states and alleges that the following described real estate is subject to judicial foreclosure; that the amount of taxes, interest, and fees due are as follows; that the presale statutory costs are as follows; and that the owners and supposed owners and parties having an interest in the real estate are as follows:

Tax AIN #: U18530-004

Situs Address: 2360 EXCHANGE PL, LAWRENCE, KS 66046

Legal Description: Lot 5, Block 1, A Final Plat of Fairfield East Addition No. 1, a Replat of Fairfield Farms East Addition No. 2, in the City of Lawrence, Douglas County, Kansas.

The taxes and special assessments for the years 2012, 2013, 2014, 2015, and 2016 are delinquent. The amount of delinquent and currently due taxes, special assessments, penalties, and interest chargeable to said described property as of October 6, 2017, as far as can be practically ascertained, are: **\$114,872.04**

The Presale Statutory Costs are: \$322.00

The name of the owner of said property is: **EBRPH, LLC**

The following parties claim some interest to the parcel of real estate, the extent of which is unknown by the Plaintiff:

1. **Emprise Bank**, including but not limited to, a claim pursuant to a mortgage to secure an original principal indebtedness of \$3,025,000.00, and any other amounts or obligations secured thereby, dated July 25, 2012, and recorded July 26, 2012, in Book 1090, Page 149.

**CAUSE NO. 7**

Plaintiff, for this cause of action, incorporates Paragraphs 1 through 9 by reference and additionally states and alleges that the following described real estate is subject to judicial foreclosure; that the amount of taxes, interest, and fees due are as follows; that the presale statutory costs are as follows; and that the owners and supposed owners and parties having an interest in the real estate are as follows:

Tax AIN #: U18530-005

Situs Address: 2330 EXCHANGE PL, LAWRENCE, KS 66046

Legal Description: Lot 6, Block 1, A Final Plat of Fairfield East Addition No. 1, a Replat of Fairfield Farms East Addition No. 2, in the City of Lawrence, Douglas County, Kansas.

The taxes and special assessments for the years 2012, 2013, 2014, 2015, and 2016 are delinquent. The amount of delinquent and currently due taxes, special assessments, penalties, and interest chargeable to said described property as of October 6, 2017, as far as can be practically ascertained, are: **\$270,513.42**

The Presale Statutory Costs are: \$322.00

The name of the owner of said property is: **EBRPH, LLC**

The following parties claim some interest to the parcel of real estate, the extent of which is unknown by the Plaintiff:

1. **Emprise Bank**, including but not limited to, a claim pursuant to a mortgage to secure an original principal indebtedness of \$3,025,000.00, and any other amounts or obligations secured thereby, dated July 25, 2012, and recorded July 26, 2012, in Book 1090, Page 149.

**CAUSE NO. 8**

Plaintiff, for this cause of action, incorporates Paragraphs 1 through 9 by reference and additionally states and alleges that the following described real estate is subject to judicial foreclosure; that the amount of taxes, interest, and fees due are as follows; that the presale statutory costs are as follows; and that the owners and supposed owners and parties having an interest in the real estate are as follows:

Tax AIN #: 200418DB

Situs Address: 956 E 2000 RD, EUDORA, KS 66025

Legal Description: A tract of land located in the Northwest Quarter of Section 31, Township 13 South, Range 21 East of the 6th Principal Meridian, Douglas County, Kansas, more particularly described as follows:

Beginning at the Southeast corner of the Southwest Quarter of the Northwest Quarter; thence South 89 degrees 53 minutes 22 seconds West, a distance of 533.65 feet, said point being on the South line of the Southwest Quarter of the Northwest Quarter; thence North 0 degrees 00 minutes 42 seconds West, a distance of 292.97 feet; thence North 89 degrees 57 minutes 21 seconds West, a distance of 748.33 feet; said point being on the West line of the Southwest Quarter of the Northwest Quarter; thence along said West line North 0 degrees 00 minutes 42 seconds West a distance of 50.00 feet; thence South 89 degrees 57 minutes 21 seconds East, a distance of 1,281.58 feet, said point being on the East line of the Southwest Quarter of the Northwest Quarter; thence South 0 degrees 04 minutes 39 seconds East, a distance of 341.53 feet to the point of beginning.

The taxes for the years 2012, 2013, 2014, 2015, and 2016 are delinquent. The amount of delinquent and currently due taxes, penalties, and interest chargeable to said described property as of October 6, 2017, as far as can be practically ascertained, are: **\$14,561.81**

The Presale Statutory Costs are: \$322.00

The name of the owner of said property is: **SCOT J. HAMLIN**

The following parties claim some interest to the parcel of real estate, the extent of which is unknown by the Plaintiff:

1. **John Doe #3**, including but not limited to, any claims as a tenant of the subject property.

### CAUSE NO. 9

Plaintiff, for this cause of action, incorporates Paragraphs 1 through 9 by reference and additionally states and alleges that the following described real estate is subject to judicial foreclosure; that the amount of taxes, interest, and fees due are as follows; that the presale statutory costs are as follows; and that the owners and supposed owners and parties having an interest in the real estate are as follows:

Tax AIN #: U09232A  
Situs Address: 2447 W. 6<sup>th</sup> STREET, LAWRENCE, KS 66049  
Legal Description: Lots 1, 2 and the West 25 feet of Lot 3, in Block 9, in Sunset Hill Estate Subdivision, an Addition, to the City of Lawrence, in Douglas County, Kansas.

The taxes for the years 2011 and 2012 are delinquent. The amount of delinquent and currently due taxes, penalties, and interest chargeable to said described property as of October 6, 2017, as far as can be practically ascertained, are: **\$32,059.95**

The Presale Statutory Costs are: \$322.00

The name of the owner of said property is: **KDL, INC.**

The following parties claim some interest to the parcel of real estate, the extent of which is unknown by the Plaintiff:

1. **Emprise Bank**, including but not limited to, claims pursuant to:
  - a. a mortgage to secure an original principal indebtedness of \$361,250.00, and any other amounts or obligations secured thereby, dated November 6, 2009, and recorded November 6, 2009, in Book 1055, Page 4629.
  - b. an assignment of rents to secure an original principal indebtedness of \$361,250.00 and any other amounts or obligations secured thereby, dated November 6, 2009, and recorded November 6, 2009, in Book 1055, Page 4636.
2. **John Doe #4**, including but not limited to, any claims as a tenant of the subject property.

**CAUSE NO. 10**

Plaintiff, for this cause of action, incorporates Paragraphs 1 through 9 by reference and additionally states and alleges that the following described real estate is subject to judicial foreclosure; that the amount of taxes, interest, and fees due are as follows; that the presale statutory costs are as follows; and that the owners and supposed owners and parties having an interest in the real estate are as follows:

Tax AIN #: N07073  
Situs Address: 200 MAPLE ST BLK 3, LAWRENCE, KS 66044  
Legal Description: Lot 184 less the North 20 feet, and also less Railroad Right of Way, in Addition No. 2, in that part of the City of Lawrence known as North Lawrence, Douglas County, Kansas.

The taxes for the years 2012, 2013, 2014, 2015, and 2016 are delinquent. The amount of delinquent and currently due taxes, penalties, and interest chargeable to said described property as of October 6, 2017, as far as can be practically ascertained, are: **\$230.37**

The Presale Statutory Costs are: \$322.00

The name of the owner of said property is: **J.J. KRUM**

The following parties claim some interest to the parcel of real estate, the extent of which is unknown by the Plaintiff:

1. **John Allan Krum**, basis of claim, if any, is unknown.

**CAUSE NO. 11**

Plaintiff, for this cause of action, incorporates Paragraphs 1 through 9 by reference and additionally states and alleges that the following described real estate is subject to judicial foreclosure; that the amount of taxes, interest, and fees due are as follows; that the presale statutory costs are as follows; and that the owners and supposed owners and parties having an interest in the real estate are as follows:

Tax AIN #: N07072  
Situs Address: 200 MAPLE ST BLK 2, LAWRENCE, KS 66044  
Legal Description: The North 20 feet of Lot 184 in Addition No. 2 in that part of the City of Lawrence known as North Lawrence, Douglas County, Kansas.

The taxes for the years 2012, 2013, 2014, 2015, and 2016 are delinquent. The amount of delinquent and currently due taxes, penalties, and interest chargeable to said described property as of October 6, 2017, as far as can be practically ascertained, are: **\$186.77**

The Presale Statutory Costs are: \$322.00

The name of the owner of said property is: **JOHN ALLAN KRUM**

The following parties claim some interest to the parcel of real estate, the extent of which is unknown by the Plaintiff: **NONE**

**CAUSE NO. 12**

Plaintiff, for this cause of action, incorporates Paragraphs 1 through 9 by reference and additionally states and alleges that the following described real estate is subject to judicial foreclosure; that the amount of taxes, interest, and fees due are as follows; that the presale statutory costs are as follows; and that the owners and supposed owners and parties having an interest in the real estate are as follows:

Tax AIN #: U13915M  
Situs Address: 301 BOULDER ST, LAWRENCE, KS 66049  
Legal Description: Lot 13, in Block 1, in Westridge Heights, an Addition to the City of Lawrence, as shown by the recorded plat thereof, in Douglas County, Kansas.

The taxes for the years 2012, 2013, 2014, 2015, and 2016 are delinquent. The amount of delinquent and currently due taxes, penalties, and interest chargeable to said described property as of October 6, 2017, as far as can be practically ascertained, are: **\$14,995.42**

The Presale Statutory Costs are: \$322.00

The name of the owner of said property is: **PAMELA S. MARTINEZ and JOHN D. MARTINEZ**

The following parties claim some interest to the parcel of real estate, the extent of which is unknown by the Plaintiff:

1. **State of Kansas, Department of Revenue**, including but not limited to, a claim pursuant to a Tax Warrant, filed July 10, 2015, in Douglas County Case No. 2015-ST-165 in the amount of \$2,037.11.
2. **John Doe #5**, including but not limited to, any claims as a tenant of the subject property.

**CAUSE NO. 13**

Plaintiff, for this cause of action, incorporates Paragraphs 1 through 9 by reference and additionally states and alleges that the following described real estate is subject to judicial foreclosure; that the amount of taxes, interest, and fees due are as follows; that the presale statutory costs are as follows; and that the owners and supposed owners and parties having an interest in the real estate are as follows:

Tax AIN #: 200436

Situs Address: VACANT LAND

Legal Description: Tract I: The East one-half (1/2) of the South one-half (1/2) of the Southwest Quarter (SW-1/4) of Section Thirty-three (33) in Township Thirteen (13) South, Range Twenty-one (21) East of the Sixth P.M., in Douglas County, Kansas.

Tract II: The North one-half (1/2) of the Southwest Quarter (SW-1/4) of Section Thirty-three (33) in Township Thirteen (13) South, Range Twenty-one (21) East of the Sixth P.M., in Douglas County, Kansas.

The taxes for the years 2012, 2013, 2014, 2015, and 2016 are delinquent. The amount of delinquent and currently due taxes, penalties, and interest chargeable to said described property as of October 6, 2017, as far as can be practically ascertained, are: **\$10,034.03**

The Presale Statutory Costs are: \$322.00

The name of the owner of said property is: **JOSEPH STARR PRICE and MICHAEL WILLIAM PRICE**

The following parties claim some interest to the parcel of real estate, the extent of which is unknown by the Plaintiff: **NONE**

**CAUSE NO. 14**

Plaintiff, for this cause of action, incorporates Paragraphs 1 through 9 by reference and additionally states and alleges that the following described real estate is subject to judicial foreclosure; that the amount of taxes, interest, and fees due are as follows; that the presale statutory costs are as follows; and that the owners and supposed owners and parties having an interest in the real estate are as follows:

Tax AIN #:	400041C
Situs Address:	VACANT LAND
Legal Description:	A tract of land in the Southeast Quarter of Section 1, Township 13 South, Range 17 East of the 6th P.M., in Douglas County, Kansas, being described as follows: Commencing at the Southwest corner of said Southeast Quarter, thence East along the South line of said Quarter on an assumed bearing of South 89°20'12" East, a distance of 858.33 feet for the Point of Beginning: Thence North 00°39'48" East, 660.00 feet thence South 89°20'12" East, 660.00 feet thence South 00°39'48" West, 660.00 feet to a point on the South line of said Southeast Quarter thence North 89°20'12" West, 660.00 feet to the Point of Beginning.

The taxes for the years 2012, 2013, 2014, 2015, and 2016 are delinquent. The amount of delinquent and currently due taxes, penalties, and interest chargeable to said described property as of October 6, 2017, as far as can be practically ascertained, are: **\$150.82**

The Presale Statutory Costs are: \$322.00

The name of the owner of said property is: **ANGELA D. SMITH and TRAVIS S. SMITH**

The following parties claim some interest to the parcel of real estate, the extent of which is unknown by the Plaintiff: **NONE**

**CAUSE NO. 15**

Plaintiff, for this cause of action, incorporates Paragraphs 1 through 9 by reference and additionally states and alleges that the following described real estate is subject to judicial foreclosure; that the amount of taxes, interest, and fees due are as follows; that the presale statutory costs are as follows; and that the owners and supposed owners and parties having an interest in the real estate are as follows:

Tax AIN #: U09615  
Situs Address: 1600 DELAWARE ST, LAWRENCE, KS 66044  
Legal Description: Lot 7, Block D, in Brookdale, an Addition to the City of Lawrence, Douglas County, Kansas.

The taxes for the years 2012, 2013, 2014, 2015, and 2016 are delinquent. The amount of delinquent and currently due taxes, penalties, and interest chargeable to said described property as of October 6, 2017, as far as can be practically ascertained, are: **\$225.91**

The Presale Statutory Costs are: \$322.00

The name of the owner of said property is: **ED STRODA**

The following parties claim some interest to the parcel of real estate, the extent of which is unknown by the Plaintiff:

1. **Cauletaus N. Stroda**, basis of claim, if any, is unknown.
2. Unknown heirs, executors, administrators, devisees, trustee, creditors, and assigns of Ed Stroda.
3. **Edmond Paul Stroda, Jr.**, basis of claim, if any, is unknown.
4. **Lawrence P. Stroda II**, basis of claim, if any, is unknown.
5. **Vicki D. Stroda-Smith**, basis of claim, if any, is unknown.
6. **Sherry L. Chappell-Dickens**, basis of claim, if any, is unknown.

**CAUSE NO. 16**

Plaintiff, for this cause of action, incorporates Paragraphs 1 through 9 by reference and additionally states and alleges that the following described real estate is subject to judicial foreclosure; that the amount of taxes, interest, and fees due are as follows; that the presale statutory costs are as follows; and that the owners and supposed owners and parties having an interest in the real estate are as follows:

Tax AIN #: U09616  
Situs Address: 1600 DELAWARE ST, LAWRENCE, KS 60044  
Legal Description: Lot 8, Block D, in Brookdale, an Addition to the City of Lawrence, Douglas County, Kansas.

The taxes for the years 2012, 2013, 2014, 2015, and 2016 are delinquent. The amount of delinquent and currently due taxes, penalties, and interest chargeable to said described property as of October 6, 2017, as far as can be practically ascertained, are: **\$226.25**

The Presale Statutory Costs are: \$322.00

The name of the owner of said property is: **ED STRODA**

The following parties claim some interest to the parcel of real estate, the extent of which is unknown by the Plaintiff:

1. **Cauletaus N. Stroda**, basis of claim, if any, is unknown.
2. Unknown heirs, executors, administrators, devisees, trustee, creditors, and assigns of Ed Stroda.
3. **Edmond Paul Stroda, Jr.**, basis of claim, if any, is unknown.
4. **Lawrence P. Stroda II**, basis of claim, if any, is unknown.
5. **Vicki D. Stroda-Smith**, basis of claim, if any, is unknown.
6. **Sherry L. Chappell-Dickens**, basis of claim, if any, is unknown.

**CAUSE NO. 17**

Plaintiff, for this cause of action, incorporates Paragraphs 1 through 9 by reference and additionally states and alleges that the following described real estate is subject to judicial foreclosure; that the amount of taxes, interest, and fees due are as follows; that the presale statutory costs are as follows; and that the owners and supposed owners and parties having an interest in the real estate are as follows:

Tax AIN #:	E00519
Situs Address:	1021 SPRUCE ST, EUDORA KS 66025
Legal Description:	Lot 15 and the South One-half of Lot 16, in Block 36, in the City of Eudora, Douglas County, Kansas.

The taxes for the years 2012, 2013, 2014, 2015, and 2016 are delinquent. The amount of delinquent and currently due taxes, penalties, and interest chargeable to said described property as of October 6, 2017, as far as can be practically ascertained, are: **\$4,539.70**

The Presale Statutory Costs are: \$322.00

The name of the owner of said property is: **DAVID R. THEEL and JUDY K. THEEL**

The following parties claim some interest to the parcel of real estate, the extent of which is unknown by the Plaintiff: **NONE**

WHEREFORE, Plaintiff prays that the Court determine the amount of taxes, special assessments, charges, interest, penalties and costs chargeable to each particular tract, lot or piece of real estate described in each cause of action; the name of the owner or persons having any interest in said real estate; that the Court order such amounts found due to be first and prior liens upon such real estate; that each Defendant be required to appear and establish his/her claim, interest, title, or estate in said real estate; and that the same be sold at public sale for the satisfaction of said liens and costs, charges, and expenses of the proceedings and sale; that the Court determine and assess the costs of this action and apportion the said costs against each parcel of real estate in an equitable manner as provided by law; and that the Plaintiff be given such other and further necessary relief to which it may be entitled.

**Respectfully Submitted,**  
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Commissioners of Douglas County, Kansas

By: /s/ Jeffrey L. Heiman  
Jeffrey L. Heiman #20858