

**IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO**

KRISTEN M. SCALISE,
as Fiscal Officer of
Summit County, Ohio,

Plaintiff,

-VS-

Abbotsinch Rental Housing SPV LLC
96 Albany St.
Buffalo, NY 14213

Defendant.

Case Number: CV

Assigned to Judge:

COMPLAINT

TAX LIEN FORECLOSURE

Certificate number(s): 6800246 and 6800987-23
6800246 and 6800987-24

Permanent Parcel Numbers: 6800246 and 6800987

Property Addresses:

1920 Manchester Rd., Akron OH 44314

1922-1924 Manchester Rd., Akron, OH 44314

FIRST CLAIM FOR RELIEF

1. The Plaintiff, Kristen M. Scalise, is the Fiscal Officer of Summit County, Ohio.
2. Plaintiff brings this action on a lien of the State of Ohio to foreclosure on a delinquent land tax certificate(s) pursuant to R.C. Section 5721.18(A).
3. Exhibit A filed and incorporated herein, describes the property that is subject to this foreclosure and is referred to as parcel number 6800246 and 6800987 ("the Parcel").
4. The Preliminary Judicial Report, filed and incorporated herein, describes the property, identifies the owner(s) of record and possible lienholder(s) pursuant to R.C. 2329.191, and contains a copy of recorded tax certificate(s) numbered 6800246-23 and 6800987-23 and

6800246-24 and 6800987-24.

5. Plaintiff has certified notice to the Summit County Prosecuting Attorney that the tax certificate holder has requested foreclosure, the certificate parcel has not been redeemed, and the certificate is eligible to be enforced through a foreclosure proceeding pursuant to R.C. 5721.37(C)(1), attached and incorporated as Exhibit B.
6. The tax certificate holder is vested with the first lien previously held by the State and its taxing districts for the amount of taxes, assessments, penalties, charges and interest including the prosecuting attorney's fee charged against the Parcel.
7. In addition to the tax certificate(s), the tax certificate holder has submitted payment to the Plaintiff to the sum of any prosecution fees, taxes, assessments, penalties, interest, and charges appearing on the tax duplicate charged against the certificate parcel that is the subject of the foreclosure proceedings and that are not covered by a tax certificate in the amount prescribed by R.C. 5721.37(B)(1)–(3).
8. As provided by R.C. 5721.38(B) the redemption price is now calculated by the Fiscal Office to be: **\$21,267.44** as of August 2025. This balance continues to increase because of statutory interest charges, penalties, additional taxes and court costs.
9. The certificate or master list has been duly filed by the auditor, the amount described above is due and unpaid, and there is a lien against the property described in the certificate.
10. Pursuant to R.C. 5721.39(A), there are and/or will be delinquent taxes, assessments, penalties, interest, and charges on the Parcel that are not covered by the tax certificate(s) or a payment under R.C. 5721.37(B)(2) which are or will be a good and valid lien.
11. The following:

Abbotsinch Rental Housing SPV LLC

Claim to have some interest in or lien upon the Parcel, but Plaintiff not being fully advised as to the extent, if any, of such liens or claims, says that the same, if any, are inferior and subsequent to the lien of the Plaintiff and the certificate holder and Plaintiff prays that said defendants be required to set up their liens or claims, or be forever barred from asserting same against the premises described herein.

WHEREFORE, Plaintiff demands judgment against the defendant(s) on the certificate of redemption price; the interest on the certificate at the rate of eighteen percent per year from the day payment was submitted by the certificate holder under R.C. 5721.37(B); any delinquent taxes, assessments, penalties, interest and charges on the Parcel not covered by the tax certificate(s); and the fees and costs incurred in the foreclosure proceeding including, without limitation, the fees, costs and charges of the Prosecuting Attorney as provided in R.C. Sections 5721.37(B) and 5721.39; that the amounts due be declared to be valid first liens upon the property; that such liens be foreclosed; that unless the amounts found due together with costs of this proceeding be tendered to the Plaintiff prior to the filing of any entries of Confirmation of Sale pursuant to such proceeding, the equity of redemption of said parties shall be foreclosed; that any person owning or claiming any right, title, or interest in, or lien upon the property be required to answer, setting up their interest, if any, on said property or be forever barred from asserting same; that the Court order said property to be sold in the manner provided by R.C. Section 5721.19; that an Order of Sale be issued to the Sheriff, directing her to advertise and sell said property at public sale in the manner provided by law; that thereafter a report of such sale be made by the Sheriff to the Court for further proceedings under law; and for such further and other relief as in law or equity this Plaintiff may be entitled.

Respectfully submitted,

ELLIOT KOLKOVICH
Summit County Prosecuting Attorney

/s/ Carrie Hill

CARRIE HILL #0099795

Assistant Prosecuting Attorney

53 University Avenue, 7th Floor

Akron, Ohio 44308

(330) 643-6454

(330) 643-8540 - FAX

chill@prosecutor.summitoh.net

Attorney for Plaintiff

Exhibit A

Summit County Fiscal Office
Kristen M. Scalise CPA, CFE, Fiscal Officer
175 S. Main Street
Akron OH 44308

PROPERTY DESCRIPTION PRE-APPROVAL FORM

CASE NO:
PARCEL NO(S): 68-00246
PROPERTY ADDRESS(ES): 1924-1922 Manchester Road & 567 Sharon St., Akron, OH 44314
PLAINTIFF: Summit County Fiscal Office
DEFENDANT: Abbotsinch Rental Housing SPV LLC
SUBMITTED BY: Titanium Title
ATTORNEY'S SUPREME COURT ID#
ATTORNEY'S PHONE:
CONTACT PERSON: Eric Schuring
CONTACT PHONE: 216-402-1088

You will be submitting the Final Judicial Report, this Property Description Approval Form and the approved legal description to the Summit County Clerk of Courts.

DISCLAIMER: The Summit County Fiscal Office makes no warranties, expressed or implied, concerning the accuracy or completeness of this information.

Summit County Use Only

☐

Owner name (if different from above): _____

Number of Lots: 1

Rev 1/2011

Situated in the Village of Kenmore (now City of Akron), County of Summit and State of Ohio;

And known as being part of Lot Number Eighteen (18) in Tract Number 10 and part of Lot Number Seven (7) in Tract Number Two (2): Beginning at an iron pin set in the center of Akron and Manchester Road at the Southeast corner of a 1.45 acre tract of land deeded to Samuel Goodman by Ella Witwer by deed dated September 12, 1892 and recorded in Book # 192, Page 597, Summit County Records, said Southeast corner is also the intersection of the North line of Sharon Street extended Easterly and the intersection of the centerline of Manchester Road; thence West along the North line of a roadway Thirty-five (35) feet in width and along the South line of said 1.45 acre tract of land One Hundred Forty (140) feet; thence Northwesterly along a line parallel to the center line of the Akron and Manchester Road Forty (40) feet; thence East along a line parallel to the South line of said 1.45 acre tract of land One Hundred Forty (140) feet to a point in the center line of the Akron and Manchester Road; thence Southerly along said center line of said road Forty (40) feet to the place of beginning, said property being Forty (40) feet on the Akron and Manchester Road by One Hundred Ten (110) feet deep, be the same more or less, but subject to all legal highways.

Parcel No. 68-00246

Routing No. 05-00570-03-008.000



Also known as 1924-1922 Manchester Road & 567 Sharon Street, Akron, OH 44314

Summit County Fiscal Office
Kristen M. Scalise CPA, CFE, Fiscal Officer
175 S. Main Street
Akron OH 44308

PROPERTY DESCRIPTION PRE-APPROVAL FORM

CASE NO:
PARCEL NO(S): 68-00987
PROPERTY ADDRESS(ES): 1920 Manchester Rd, Akron, OH 44314
PLAINTIFF: Summit County Fiscal Office
DEFENDANT: Abbotsinch Rental Housing SPV LLC
SUBMITTED BY: Titanium Title
ATTORNEY'S SUPREME COURT ID#
ATTORNEY'S PHONE:
CONTACT PERSON: Eric Schuring
CONTACT PHONE: 216-402-1088

You will be submitting the Final Judicial Report, this Property Description Approval Form and the approved legal description to the Summit County Clerk of Courts.

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Summit County Use Only

☐

Owner name (if different from above): _____

Number of Lots: 2

Rev 1/2011

Situated in the City of Akron, County of Summit and State of Ohio:

And known as being part of Lot No. 18 in Tract No. 10 and part of Lot No. 7 in Tract No. 2, formerly in Coventry Township, said premises are a part of the premises which were conveyed by John F. Plainz to George Neiderhouse by deed recorded in Summit County Records Volume 412 at Page 7, further bounded and described as follows: Beginning at a point in the Westerly line of Akron-Manchester Road, which point is 40 feet Northerly of the intersection of the Westerly line of Akron-Manchester Road with the Northerly line of Sharon Street; thence Westerly, parallel with the Northerly line of Sharon Street, a distance of approximately 110 feet to the Westerly line of the lands owned by a former grantor; thence Northerly, parallel with the Westerly line of Akron-Manchester Road and along the Westerly line of the land owned by a former grantor, a distance of 30 feet; thence Easterly, parallel to the Northerly line of Sharon Street, a distance of approximately 110 feet the Westerly line of Akron-Manchester Road; thence Southerly along the Westerly line of Akron-Manchester Road a distance of 30 feet to the place of beginning, be the same more or less, but subject to all legal highways.

Parcel No. 68-00987

Routing No. 05-00570-03-009.000

JD

Also known as 1920 Manchester Road, Akron, OH 44314

Exhibit B

DTE 122A

Rev. 3/11

Request for Foreclosure

Pursuant to Ohio Revised Code 5721.37, I, **NAR Ohio, LLC**, hereby file a request for a foreclosure action with the-
Summit County Fiscal Office on the following tax certificate on this date June 30, 2025.

Tax certificate number 6800246-23 / 6800246-24

Lien year(s) 2022 / 2024

Parcel owner ABBOTSINCH RENTAL HOUSING SPV LLC

Property address 1924 -1922 MANCHESTER RD

Tax certificate sale date November 3, 2023 / October 23, 2024

The above certificate holder has submitted the following required monies and fees associated with this foreclosure request:

1. Certificate redemption prices of any other tax certificates sold on the parcel,
other than tax certificates held by the certificate holder filing this form
(certificates listed
separately on other side) \$ 0
2. Taxes, assessments, penalties, interest, and charges that are not covered by a
tax certificate (itemized listing on other side)..... \$ 2652.75
3. Foreclosure fee prescribed by the county prosecutor \$ 3000.00
4. Total paid on this date \$ 5652.75

Signature

Amber Thomas

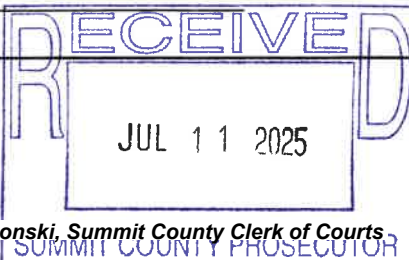
Tax certificate holder

I hereby certify that the above certificate parcel has not been redeemed, the amount indicated in line 4 has been received
by me and the certificate holder has made a request for foreclosure, which I have submitted to the county prosecutor to
commence foreclosure proceedings on this date: 7-7-25

Signature

Kathy Wells

Treasurer/designee



FISCAL OFFICE

County of Summit

JUN 30 2025

RECEIVED

Tavia Galonski, Summit County Clerk of Courts

Tax Cert# 6800246-23 / 6800246-24

Other Tax Certificates on Parcel

1. Tax certificate number _____	
Lien year(s) _____	Certificate redemption price \$ _____
2. Tax certificate number _____	
Lien year(s) _____	Certificate redemption price \$ _____
3. Tax certificate number _____	
Lien year(s) _____	Certificate redemption price \$ _____
4. Tax certificate number _____	
Lien year(s) _____	Certificate redemption price \$ _____
	Total (place on front of form) \$ _____

Taxes Not on a Tax Certificate

1. Lien year 2023 _____	Amount \$ 0 _____
2. Lien year 2024 _____	Amount \$ 2652.75 _____
3. Lien year _____	Amount \$ _____
4. Lien year _____	Amount \$ _____
	Total (place on front of form) \$ 2652.75 _____

DTE 122A

Rev. 3/11

Request for Foreclosure

Pursuant to Ohio Revised Code 5721.37, I, **NAR Ohio, LLC**, hereby file a request for a foreclosure action with the Summit County Fiscal Office on the following tax certificate on this date June 30, 2025.

Tax certificate number 6800987-23 / 6800987-24

Lien year(s) 2022 / 2024

Parcel owner ABBOTSINCH RENTAL HOUSING SPV LLC

Property address 1920 MANCHESTER RD

Tax certificate sale date November 3, 2023 / October 23, 2024

The above certificate holder has submitted the following required monies and fees associated with this foreclosure request:

1. Certificate redemption prices of any other tax certificates sold on the parcel, other than tax certificates held by the certificate holder filing this form (certificates listed separately on other side) \$ 0
2. Taxes, assessments, penalties, interest, and charges that are not covered by a tax certificate (itemized listing on other side)..... \$ 1541.70
3. Foreclosure fee prescribed by the county prosecutor \$ _____
4. Total paid on this date \$ 1541.70

Signature

Amber Thomas

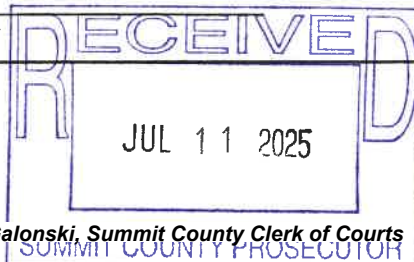
Tax certificate holder

I hereby certify that the above certificate parcel has not been redeemed, the amount indicated in line 4 has been received by me and the certificate holder has made a request for foreclosure, which I have submitted to the county prosecutor to commence foreclosure proceedings on this date: 7.9.25

Signature

Kathy Kline

Treasurer/designee

FISCAL OFFICE
County of Summit

JUN 30 2025

RECEIVED

Tax Cert# 6800987-23 / 6800987-24

Other Tax Certificates on Parcel

1. Tax certificate number		
Lien year(s)		Certificate redemption price \$
2. Tax certificate number		
Lien year(s)		Certificate redemption price \$
3. Tax certificate number		
Lien year(s)		Certificate redemption price \$
4. Tax certificate number		
Lien year(s)		Certificate redemption price \$
		Total (place on front of form) \$

Taxes Not on a Tax Certificate

1. Lien year 2023		Amount \$
2. Lien year 2024		Amount \$
3. Lien year		Amount \$
4. Lien year		Amount \$
		Total (place on front of form) \$