

IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

KRISTEN M. SCALISE,
As Fiscal Officer,
Summit County, Ohio

Plaintiff

vs.

RANDY D. STOUT
2465 TYRO AVE
AKRON, OH 44305

Defendant(s)

CASE NUMBER:

JUDGE:

COMPLAINT

TAX LIEN FORECLOSURE

To foreclose the lien vested in
NAR Ohio, LLC

Certificate Number(s):
6836320-23

Permanent Parcel Number: 68-36320

PROPERTY ADDRESS: 2465 TYRO
AVE AKRON, OH 44305

FIRST CLAIM FOR RELIEF

1. The Plaintiff, Kristen M. Scalise, states that she is the Fiscal Officer of Summit County, Ohio.
2. Plaintiff brings this action pursuant to sections 5721.37, 323.25 and 5721.18 (A) of the

Ohio Revised Code.

3. The Preliminary Judicial Report filed herein and incorporated herein by reference, describes the property which is subject to this foreclosure which is referred to as Parcel number 68-36320 (hereafter “the Parcel”).

4. On or about November 3, 2023, tax certificate number 6836320-23, on the Parcel was sold by Plaintiff pursuant to sections 5721.33 et seq. of the Ohio Revised Code.

5. NAR Ohio, LLC, purchased tax certificate number(s) 6836320-23 and is the holder of the tax certificate(s) and 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. As provided by Section 5721.38 (B) of the Ohio Revised Code, the redemption price is **\$8,056.37** good through July 2025.

6. On or about June 24, 2025, NAR Ohio, LLC, the certificate holder, filed with Plaintiff a Request for Foreclosure.

7. On or about June 26, 2025, Plaintiff certified to the Summit County Prosecuting Attorney that the Parcel had not been redeemed and that the certificate holder had made a foreclosure request. Exhibit “A”, attached to the Complaint, is the Request for Foreclosure form with the Fiscal Officer’s certification that the Parcel has not been redeemed.

8. The following named Defendant(s), to wit:

RANDY D. STOUT

have or claim to have some interest in or lien upon said premises, 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.

9. Plaintiff states that there is and will also be due and payable, and thereby a good and valid lien, any delinquent taxes, assessments, penalties, interest and charges on the Parcel that are not covered by the tax certificate(s) and fees and costs incurred in this foreclosure proceeding as provided in section 5721.39 of the Ohio Revised Code.

WHEREFORE, Plaintiff demands judgment against the Defendants 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 section 5721.37 (B) of the Revised Code; 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 sections 5721.37 (B) and 5721.39 of the Revised Code; 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 section 5721.19 of the Revised Code; that an Order of Sale be issued to the Sheriff, directing him 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 Prosecutor

/s/ Una Lakic

UNA LAKIC, #0096570

Assistant Prosecuting Attorney

53 University Avenue, 7th Floor

Akron, Ohio 44308

(330) 643-8321

ulakic@prosecutor.summitoh.net

Attorney for Plaintiff

EXHIBIT A

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 16, 2025.

Tax certificate number 6836320-23

Lien year(s) 2022

Parcel owner STOUT RANDY D

Property address 2465 TYRO AVE

Tax certificate sale date November 3, 2023

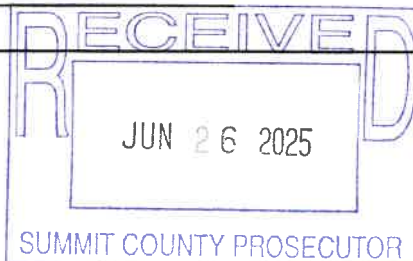
The above certificate holder has submitted the following required monies and fees associated with this foreclosure request:

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) \$ 22.97
3. Foreclosure fee prescribed by the county prosecutor \$ 3000.00
4. Total paid on this date..... \$ 3022.97

Signature Amber Mome
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: 6 24 25.

Signature Michael Z...
Treasurer/designee



FISCAL OFFICE
County of Summit

JUN 24 2025

RECEIVED

Tax Cert# 6836320-23

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 2024		Amount \$ 22.97
2. Lien year		Amount \$
3. Lien year		Amount \$
4. Lien year		Amount \$
		Total (place on front of form) \$22.97