

IN THE COURT OF COMMON PLEAS  
SUMMIT COUNTY, OHIO

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

Plaintiff

vs.

OANH VO  
589 COLE AVE  
AKRON, OH 44301  
&  
4536 GREENWOLD RD  
SOUTH EUCLID, OH 44121

OHIO DEPARTMENT OF TAXATION  
C/O OHIO ATTORNEY GENERAL  
30 E. BROAD STREET, 14<sup>TH</sup> FLOOR  
COLUMBUS, OH 43215

UNITED STATES OF AMERICA  
C/O U.S. ATTORNEY  
801 W. SUPERIOR AVE. STE. 400  
CLEVELAND, OH 44113  
&  
C/O U.S. ATTORNEY GENERAL  
MAIN JUSTICE BLDG., ROOM 5111  
10<sup>TH</sup> CONSTITUTIONAL AVE.  
WASHINGTON, DC 20530

Defendant(s)

CASE NUMBER:

JUDGE:

**COMPLAINT**

TAX LIEN FORECLOSURE

To foreclose the lien vested in  
NAR Ohio, LLC

**Certificate Number(s):**

6744672-23

6744672-24

**Permanent Parcel Number:** 67-44672

**PROPERTY ADDRESS:** 589 COLE AVE.,  
AKRON, OH 44301

**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 67-44672 (hereafter “the Parcel”).

4. On or about November 3, 2023, tax certificate number 6744672-23, on the Parcel was sold by Plaintiff pursuant to sections 5721.33 et seq. of the Ohio Revised Code.

5. On or about October 23, 2024, tax certificate number 6744672-24, on the Parcel was sold by Plaintiff pursuant to sections 5721.33 et seq. of the Ohio Revised Code.

6. NAR Ohio, LLC, purchased tax certificate number(s) 6744672-23, and 6744672-24 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 **\$8,528.95** good through August 2025.

7. On or about June 30, 2025, NAR Ohio, LLC, the certificate holder, filed with Plaintiff a Request for Foreclosure.

8. On or about July 7, 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.

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

OANH VO

## OHIO DEPARTMENT OF TAXATION

## UNITED STATES OF AMERICA

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.

10. 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, 7<sup>th</sup> Floor  
Akron, Ohio 44308  
(330) 643-8321  
[ulakic@prosecutor.summitoh.net](mailto:ulakic@prosecutor.summitoh.net)  
Attorney for Plaintiff

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 6744672-23 / 6744672-24

Lien year(s) 2021 / 2024

Parcel owner VO OANH

Property address 589 COLE AVE

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

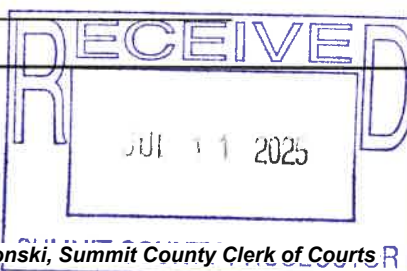
The above certificate holder has submitted the following required monies and fees associated with this foreclosure request:

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) ..... \$ 1402.27
3. Foreclosure fee prescribed by the county prosecutor ..... \$ 3000.00
4. Total paid on this date ..... \$ 4402.27

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 [Signature]  
Treasurer/designee



FISCAL OFFICE  
County of Summit

JUN 30 2025

RECEIVED

Tavia Galonski, Summit County Clerk of Courts

Tax Cert# 6744672-23 / 6744672-24

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 \$ 1402.27 _____
3. Lien year _____	Amount \$ _____
4. Lien year _____	Amount \$ _____
Total (place on front of form) \$ 1402.27 _____	