



1. This action is brought to foreclose the rights of redemption in and to the properties described herein under and by virtue of Section 14-808, et seq. of the Tax Property Article of the Annotated Code of Maryland and in accordance with the Maryland Rules of Civil Procedure.

2. On May 15, 2023, the Director of Finance and Collector of State and City Taxes for the City of Baltimore and State of Maryland, sold the property known as: Lot size: 12x75-4, Ward 15, Section 14, Block 0010, Lot 016, improvements known as 1732 N Calhoun St, and issued the appropriate Certificate of Tax Sale to Plaintiff.

3. ***A Certificate of Substantial Repair was issued for this property, entitling Plaintiff to file this foreclosure action after 60 days from the date of the tax sale pursuant to Tax-Property §14-833(e)(1).*** See Real Property § 7-105.11 and Section 116 of Chapter 1 of the Baltimore City Building, Fire, and Related Codes, stating that the issuance of a Certificate of Substantial Repair means that the property has been cited as vacant and unfit for human habitation.

4. This proceeding to foreclose the rights of redemption is brought within two (2) years of the date of issuance of the aforesaid Certificate of Tax Sale.

5. The amount necessary for redemption of the property is the whole amount of money received by such collector from the sale of the property, together with interest at the rate of eighteen percent (18%) per year from the date of sale to the date of redemption (except as stated in subsection (b) of §14-802 of the Tax-Property Article of the Annotated Code of Maryland), and all taxes and other municipal liens accruing subsequent to the date of sale together with interest and penalties thereon, and the total disbursements made by the Plaintiff, the present holder of the Certificate of Tax Sale, in accordance with the provisions of the Tax Sale Property Article of the Annotated Code of Maryland, Section 14-808, et seq.

6. A Certificate of Tax Sale was issued by the aforesaid Director of Finance containing a description of the property in substantially the same form as the description appearing on the Director's Tax Rolls. The cost of the Certificate was \$4,751.00, of which \$330.25 was paid. A copy of the Certificate of Tax Sale and Certificate of Substantial Repair are attached hereto as Exhibit A.

7. A careful and diligent search of the Land Records of Baltimore City, the records of the Register of Wills for Baltimore City and the records of the civil courts shows:

a. By Assignment recorded at Liber MB 23506 folio 439, and Merger Deed recorded at MB 24054 folio 302, fee simple title is vested in Arnold Investors, LLC

8. Additional Defendants to this action are:

- a. the State of Maryland;
- b. Mayor & City Council of Baltimore;

c. All persons that have or claim to have any interest in the Tax Rolls of the Director of Finance Collector of State and City taxes for Baltimore City as follows: Lot size: 12x75-4, Ward 15, Section 14, Block 0010, Lot 016, improvements known as 1732 N Calhoun St.

9. The description of the property recited at length in the aforementioned Deed is intended to describe the same property which appears on the Tax Rolls of the Director of Finance and is further intended to describe the same property by metes and bounds, in detail, at length, which appears on the Certificate of Tax Sale.

10. That no party in interest has redeemed the delinquent taxes.

WHEREFORE, Plaintiff requests:

A. That this Honorable Court pass a final Decree foreclosing all rights of redemption of the Defendants and of all persons having or claiming to have any interest in and to the aforesaid property herein described.

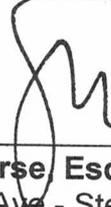
B. That this Honorable Court pass a final Decree vesting in the Plaintiff, a fee simple title, in and to the property herein described and referred to, and bar all rights of redemption of the Defendants to foreclose all prior or subsequent alienations and descents of the properties herein described and all encumbrances thereon, public easements to which the properties are subject, taxes and other municipal liens accruing subsequent to the date of the aforementioned Tax Sale.

C. That a Writ of Subpoena be issued to the Defendants to these actions at the address indicated as aforesaid to command each of the said Defendants to be and appear in this Court on some day certain to be named herein and answer the said Complaint or redeem the property and abide by and perform by such Decree or Order as may be passed therein and warning said Defendants that in case of failure to do so, a final decree will be rendered foreclosing all rights of redemption in the aforementioned property.

D. That an Order of Publication be passed, giving notice to the aforesaid Defendants and all other persons, known or unknown, having or claiming to have an interest in the aforesaid property of the object and substance of this Complaint, and warning them to be and appear in this Court, in person, or by Solicitor, on or before the day mentioned therein, and to show cause, if any they may have, why a Decree should not be passed as prayed.

E. And for such other and further relief as the nature of its cause may require.

Respectfully submitted,



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**J. Scott Morse, Esq**  
9 Newburg Ave - Ste 201  
Catonsville, MD 21228  
p. 410-747-2019 f. 410-558-6155  
smorse@morselawmd.com  
Attorney for Plaintiff  
AIS No. 9912150236

**AFFIDAVIT OF COMPLIANCE**

I, J. Scott Morse, Attorney for the Plaintiff herein, certify under the penalties of perjury, that prior to the filing of the within Complaint, the Affiant caused a search to be made of the Land Records of Baltimore City, the records of the Register of wills, and the Orphan's Court, and the Courts of Law and Equity of Baltimore City, which search and examination disclosed that the only persons having any interest in the subject properties are the defendants named in the Complaint. That prior to the filing of the Complaint, notice was mailed in accordance with Tax-Property § 14-833, and that I have in all other respects complied with the requirements of §§ 14-800, et seq. of the Tax Property Article of the Annotated Code of Maryland.



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J. Scott Morse

**CERTIFICATE OF TAX SALE  
MADE BY  
DIRECTOR OF FINANCE OF BALTIMORE**

I, Michael Moiseyev, Director of Finance, Collector of Taxes for the City of Baltimore and the State of Maryland hereby certify that on **MAY 15, 2023**

I sold to **LN IRA LLC**  
**9 NEWBURG AVE STE 201** **CATONSVILLE, MD 21228**

at public auction, property in the City of Baltimore known as

**1732 N CALHOUN ST**

and described as follows: Lot Size **12X75-4**

(Being known as Ward **15** Section **14** Block **0010** Lot **016**  
on the Tax Roll of the Director of Finance).

Said property having been assessed to **ARNOLD INVESTORS, LLC 2809 DUVALL RIDGE**

Was sold for the sum of **FOUR THOUSAND SEVEN HUNDRED FIFTY-ONE AND 00/100 DOLLARS**

of which **THREE HUNDRED THIRTY AND 25/100 DOLLARS**

is the total amount of taxes and other municipal liens due on the property at the time of the sale, together with interest and penalties thereon and expenses incurred in making the sale. The property described in this Certificate is subject to redemption. On redemption, the holder of this Certificate will be refunded the sums paid on the amount of the purchase price, together with interest at the rate of up to 18% per year from the date of payment to the date of redemption (except as stated in subsection (b) of §14-820 of the Tax-Property Article of the Annotated Code of Maryland) together with all other amounts specified by Chapter 761 of the Acts of 1943 and acts that amend that chapter. The balance due on account of the purchase price and all taxes and other municipal liens, together with interest and penalties on them accruing subsequent to the date of sale, must be paid to the Collector before a deed can be delivered to the purchaser. After **NOVEMBER 15, 2023** (or earlier if permitted by Chapter 254 of the Acts of 1963 and acts that amend that chapter) a proceeding can be brought to foreclose all rights of redemption in the property. This Certificate will be void unless such proceeding is brought within two (2) years from the date of this Certificate, unless otherwise provided by law, including but not limited to §§14-817 and 14-833 of the Tax-Property Article of the Annotated Code of Maryland. This property was previously sold at the Tax Sale of

Witness my hand and seal this **FIFTEENTH** day of **MAY 2023**

  
**MICHAEL MOISEYEV**  
Director of Finance/Collector





August 29, 2023

J. Scott Morse, Esq  
9 Newburg Ave - Ste 201  
Catonsville, MD 21228

**RE 1732 N. Calhoun Street :**

To Whom it May Concern:

**This is to certify** that the building or structure on the property described on the Tax Roll of the Director of Finance as 1732 N. Calhoun Street known as **Block 0010 Lot 016** is an abandoned property consisting of improved property cited as vacant and unfit for human habitation on a housing or building violation notice. This certificate is issued in accordance with and under the provisions of the Annotated Code of Maryland, Tax Property Article 14-833

Sincerely,

Building Official

cc: Tammy Hollie, Department of Finance

**VERIFICATION**

I declare under penalty of perjury that I am an authorized representative of the Baltimore City Department of Housing & Community Development and that the contents of the foregoing Substantial Repair Certificate are true and correct to the best of my knowledge, information, and belief.

08/29/2023

\_\_\_\_\_  
Jason Hessler  
On behalf of Baltimore City Department of  
Housing & Community Development

LN IRA, LLC  
 Plaintiff  
 V.  
 Arnold Investors, LLC  
 State of Maryland  
 Mayor and City Council of Baltimore  
 All persons that have or claim to have any  
 interest in the Tax Rolls of the Director of  
 Finance Collector of State and City taxes for  
 Baltimore City as follows:  
 Lot size: 12x75-4, Ward 15, Section 14,  
 Block 0010, Lot 016, improvements known  
 as 1732 N Calhoun St  
 Defendants

\* IN THE  
 \* CIRCUIT COURT  
 \* FOR  
 \*  
 \* BALTIMORE CITY  
 \*  
 \* Case No  
 \* 24-C-24-000729  
 \*  
 \* .  
 \* \* \* \* \*

**ORDER OF PUBLICATION**

This object of this proceeding is to secure the foreclosure of all rights of redemption in the following property sold by the Collector of Taxes for the City of Baltimore and the State of Maryland to the Plaintiff in this proceeding:

***Lot size: 12x75-4, Ward 15, Section 14, Block 0010, Lot 016, improvements known as 1732 N Calhoun St***

The Complaint states, among other things, that the amounts necessary for redemption have not been paid.

It is thereupon this 5<sup>th</sup> day of MARCH, 2024, by the Circuit Court for Baltimore City,

**ORDERED**, that this notice be given by the insertion of a copy of this Order in some daily newspaper having general circulation in Baltimore City once a week for three successive weeks before the 4<sup>th</sup> day of April, 2024, warning all persons with an interest in said property to be and appear in this Court by the 4<sup>th</sup> day of MAY, 2024, and redeem the property and answer the Complaint, or thereafter a final judgment will be entered foreclosing all rights of redemption in the said property and vesting in the Plaintiff a title free and clear of all encumbrances.

TRUE COPY  
 TEST



*Xavier A. Conaway*  
 Xavier A. Conaway, Clerk of the Circuit Court

**Judge Martin H. Schreiber II**  
 Judge's Signature appears on the original document

PUBLISH IN THE DAILY RECORD

4  
 LB

LN IRA, LLC

Plaintiff

V.

Arnold Investors, LLC , et al

Defendants

\* IN THE  
\* CIRCUIT COURT  
\* FOR  
\* BALTIMORE CITY  
\* CASE NO: 24-C-24-000729

\* \* \* \* \*

**NOTICE TO INTERESTED PARTIES OF ACTION TO FORECLOSE THE RIGHT OF REDEMPTION IN PROPERTY SOLD AT TAX SALE**

This notice is provided pursuant to the requirements of Maryland Rule 14-502(b)(3) in connection with the filing in Court of the above-referenced action.

A. The object of this proceeding is to secure the foreclosure of all rights of redemption in the following property situated and lying in Baltimore City, Maryland, sold, either directly or via assignment, by the Collector of Taxes for Baltimore City and the State of Maryland, to the Plaintiff in this proceeding. The Complaint states, among other things, that the amount necessary for the redemption has not been paid, although more than sixty days from the date of the sale have expired, and a Certificate of Substantial Repair was issued for this property entitling Plaintiff to file a foreclosure action pursuant to Tax-Property §14-833(e)(1).

B. That the description of the property in this foreclosure proceeding is:  
**Lot size: 12x75-4, Ward 15, Section 14, Block 0010, Lot 016  
improvements known as 1732 N Calhoun St**

C. If the above named person or entity you represent has a recorded interest, claim, lien or judgment regarding the property or its owner, you and your client are hereby notified of the filing of this Complaint and are warned to redeem the property or file an answer to the Complaint on or before the latest of:

- a. The expiration date of the period described in the summons or
- b. The date specified in the Order of Publication or
- c. 33 days after the mailing out of said Order of Publication

D. Failure to redeem the property or answer the Complaint may result in a Final Judgment Foreclosing all Rights of Redemption in and as to the property and vesting in the Plaintiff a title, free and clear of all encumbrances.

E. The above notwithstanding, pursuant to Md. Code Ann. Tax-Property § 14-827, a person with a legal interest in the property may redeem at any time until the right of redemption has been finally foreclosed by the actual issuance of Judgment Foreclosing Rights of Redemption by the Court.

  
\_\_\_\_\_  
**J. Scott Morse, Esq**  
9 Newburg Ave - Ste 201  
Catonsville, MD 21228  
p. 410-747-2019 f. 410-558-6155  
[smorse@morselawmd.com](mailto:smorse@morselawmd.com)  
Attorney for Plaintiff  
AIS No. 9912150236

  
  
\_\_\_\_\_  
**Xavier A. Conway, Clerk of the Circuit Court**  
Clerk of the Circuit Court for  
Baltimore City, Maryland



LN IRA, LLC

Plaintiff

V.

Arnold Investors, LLC , et al

Defendants

\* \* \* \* \*

\* IN THE  
\* CIRCUIT COURT  
\* FOR  
\* BALTIMORE CITY  
\* CASE NO:

**AFFIDAVIT OF TITLE SEARCH**

Pursuant to Maryland Rule 14-502, I, J. Scott Morse, hereby certify that on January 30, 2024, I personally conducted a title examination for the property listed below, which included a complete search of the records of the Land Records Office for Baltimore City, the Circuit Court for Baltimore City, and the Register of Wills for Baltimore City, in accordance with generally accepted standards of title examination for at least forty (40) years immediately before the institution of this suit.

PROPERTY: Lot size: 12x75-4, Ward 15, Section 14, Block 0010, Lot 016, improvements known as 1732 N Calhoun St on the Tax Rolls of the Director of Finance

I solemnly affirm under the penalties of perjury that the contents of the foregoing paper are true to the best of my knowledge, information and belief.



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**J. Scott Morse, Esq**  
9 Newburg Ave - Ste 201  
Catonsville, MD 21228  
p. 410-747-2019 f. 410-558-6155  
smorse@morselawmd.com  
Attorney for Plaintiff  
AIS No. 9912150236

**LN IRA, LLC**

Plaintiff

V.

**Arnold Investors, LLC , et al**

Defendants

\* IN THE  
 \* CIRCUIT COURT  
 \* FOR  
 \* BALTIMORE CITY  
 \* CASE NO:

\* \* \* \* \*

**FILING OF TITLE REPORT**

Pursuant to Rule 14-502, attached please find a title report for the property at issue in this case, Lot size: 12x75-4, Ward 15, Section 14, Block 0010, Lot 016, improvements known as 1732 N Calhoun St on the Tax Rolls of the Director of Finance, for the past forty years.




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**J. Scott Morse, Esq**  
 9 Newburg Ave - Ste 201  
 Catonsville, MD 21228  
 p. 410-747-2019 f. 410-558-6155  
 smorse@morselawmd.com  
 Attorney for Plaintiff  
 AIS No. 9912150236

PHONE  
(410) 747-2019

FAX  
(410) 558-6155  
[smorse@morselawmd.com](mailto:smorse@morselawmd.com)  
[www.morselawmd.com](http://www.morselawmd.com)

**40 YEAR TITLE REPORT**

**Property:** 1732 N Calhoun St  
Baltimore City

**Date:** 1/30/24

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**Fee Simple Title**

By Assignment recorded at Liber MB 23506 folio 439, and Merger Deed recorded at MB 24054 folio 302, fee simple title is vested in Arnold Investors, LLC

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**OPEN MORTGAGES**

NONE

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