

TAX LIEN FORECLOSURE

2129 W FAIRMOUNT AVE BALTIMORE 21223

Please contact todd@experservice.com for more information

079 with a legal description of 13X95 on the Tax Roll of the Director of Finance), the unknown owner's heirs, devisees, and personal representatives and their or any of their heirs, devisees, executors, administrators, grantees, assigns, or successors in right, title and interest and any and all persons having or claiming to have any interest in the property.

* * * * *

COMPLAINT TO FORECLOSE RIGHT OF REDEMPTION

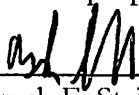
Plaintiff, EPCOT MD LLC, requests the Court foreclose the rights of redemption as to the property described below and as cause states as follows:

1. On or about 05/15/2023 the Collector of Taxes sold to the Plaintiff the hereinafter referenced property, and a tax sale certificate was issued to the Plaintiff in accordance with MD Code Tax-Property Title 14 Subsection 8.
2. A description of the property in substantially the same form as the description appearing on the certificate of tax sale is: 2129 W FAIRMOUNT AVE BALTIMORE 21223 being know as Ward - 20 Section - 14 Block - 0190 Lot - 079 with a legal description of 13X95 on the Tax Roll of the Director of Finance.
3. The property has not yet been redeemed by any party in interest.
4. The amount necessary to redeem the property is \$1,752.96 plus interest at the statutory rate from the date of sale to the redemption, plus all court costs and expenses of this proceeding including all allowed costs, expenses and fees permitted under MD Code Tax-Property §§14-828, 14-824. As of the date of this filing the amount of costs, fees and expenses is \$1550.

5. Attached as Exhibit A. is a copy of the Certificate of Tax Sale. Exhibit B. is the Abstractor's Affidavit of Title Search with a copy of the Title Search. Exhibit C. is a Notice to Interested Parties Of Action to Foreclose Rights of Redemption. Exhibit D. is the Affidavit of Compliance with Notice Requirement. Exhibit E. is a Draft Order of Publication. Exhibit F. is a copy of the substantial repair order issued for the property.

WHEREFORE the Plaintiff, EPCOT MD LLC, requests:

1. A summons be issued for service on the defendants named in the complaint;
 2. An order of publication be directed to all parties in interest in the property;
- and
3. The Court pass a judgment that forecloses all rights of redemption of the defendants and any other person having any interest in the property.



Aryeh E. Stein, Esquire
9612190183
Meridian Law, LLC
1212 Reisterstown Road
Baltimore, MD 21208
(443) 326-6011 (phone)
(410) 782-3199 (facsimile)
astein@meridianlawfirm.com

EXHIBIT A

NO. 384229

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

I, Henry J. Raymond, 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 **EPCOT MD LLC**
2833 SMITH AVE #306 **BALTIMORE, MD 21209**

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

2129 W FAIRMOUNT AVE

and described as follows: **Lot Size 13X95**

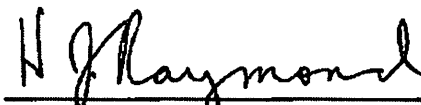
(Being known as **Ward 20 Section 14 Block 0190 Lot 079**
on the Tax Roll of the Director of Finance).

Said property having been assessed to **SMITH, HENRY 2129 W FAIRMOUNT AVE**

Was sold for the sum of **SIXTEEN THOUSAND NINE HUNDRED SEVENTY-THREE AND 08/100 DOLLARS**
of which **ONE THOUSAND SEVEN HUNDRED FIFTY-TWO AND 96/100 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**



HENRY J. RAYMOND
Director of Finance/Collector

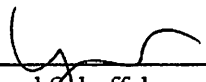
EXHIBIT B

ABTRACTOR'S AFFIDAVIT OF TITLE SEARCH AND UNKNOWN OWNER

Pursuant to MD Rule 14-502, I Yisroel Schaffel of Expery, LLC, am over the age of 18 and am competent to make this affidavit, and I personally conducted a title examination for the property known as 2129 W FAIRMOUNT AVE BALTIMORE 21223. The search included a complete search of the Land Records Office, Circuit Court, and Register of Wills for the county in which the property is located, and was in accordance with the generally accepted standards of title examination for the period of at least forty years.

I further certify that the owner of the property or a part of the property may be unknown, although a complete search of the records performed in accordance with generally accepted standards of title examination for at least 40 years immediately before the institution of the suit has been made.

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



Yisroel Schaffel
Expery, LLC
10/11/2023

EXHIBIT C

EPCOT MD LLC

Plaintiff

v.

DOROTHY HENRY (LIFE TENANT) *et al*

Defendant

* IN THE
* CIRCUIT COURT
* FOR
* BALTIMORE CITY
* Case No. _____

* * * * *

**NOTICE TO INTERESTED PARTIES
OF ACTION TO FORECLOSE RIGHT OF REDEMPTION**

You are receiving this notice because you have an interest in the following property: 2129 W FAIRMOUNT AVE BALTIMORE 21223 being know as Ward - 20 Section - 14 Block - 0190 Lot - 079 with a legal description of 13X95 on the Tax Roll of the Director of Finance. The property has been sold by the Collector of Taxes for the County in which it is located due to nonpayment of certain taxes, and the property has not been redeemed. A Complaint to Foreclose the Rights of Redemption for the property has been filed stating, among other things, that the amount necessary to redeem the property has not been paid, and requesting that the Court grant title of the property to the certificate holder. A copy of the Complaint is included in this mailing. If you have a recorded interest, claim, lien or judgment regarding the property, or are a tenant in the property, you are hereby notified of the filing of this Complaint and are warned to redeem the property or answer the Complaint.

IF THE UNPAID TAXES, TOGETHER WITH COSTS AND EXPENSES, ARE NOT PAID, THE COURT MAY ENTER A JUDGMENT FORECLOSING THE RIGHT OF REDEMPTION THAT WOULD TERMINATE YOUR LEASE AND RIGHT TO OCCUPY THE PROPERTY. YOU HAVE THE RIGHT TO PAY THE UNPAID TAXES, TOGETHER WITH COSTS AND EXPENSES, AND AVOID LEASE TERMINATION AND EVICTION. A JUDGMENT FORECLOSING THE RIGHT OF REDEMPTION COULD BE ENTERED WITHIN THE NEXT 90 DAYS AND AT THAT TIME YOU COULD BE EVICTED OR REQUIRED TO VACATE THE PROPERTY OR OTHERWISE FORFEIT ALL RIGHTS YOU MAY POSSESS RELATING TO THE PROPERTY.

Pursuant to MD Code Tax-Property Section 14-827, a person or entity with a legal interest in the property may redeem at any time until the right of redemption has been finally foreclosed by the issuance of a Judgment of Foreclosure by the Court. The final Judgment may be issued after the later of: 1) the date described in the summons, 2) the date specified in the Order of Publication, or 3) 33 days after the mailing of the Order of Publication. Payment of the certificate holder's allowed fees and expenses is a prerequisite for redemption of the property.

Clerk of the Circuit Court for BALTIMORE CITY, Maryland

EPCOT MD LLC

Plaintiff

v.

DOROTHY HENRY (LIFE TENANT) *et al*

Defendant

* IN THE
* CIRCUIT COURT
* FOR
* BALTIMORE CITY
* Case No. _____

* * * * *

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Clerk of the Circuit Court for BALTIMORE CITY, Maryland

EPCOT MD LLC

Plaintiff

v.

DOROTHY HENRY (LIFE TENANT) *et al*

Defendant

*
*
*
*
*
*

IN THE
CIRCUIT COURT
FOR
BALTIMORE CITY
Case No. _____

* * * * *

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Clerk of the Circuit Court for BALTIMORE CITY, Maryland

EXHIBIT D

EPCOT MD LLC
1777 Reisterstown Road, Suite 375
Baltimore, MD 21208

Plaintiff

v.

DOROTHY HENRY (LIFE TENANT)
Defendant

* IN THE
* CIRCUIT COURT
* FOR
* BALTIMORE CITY
* Case No. _____

* * * * *

AFFIDAVIT OF COMPLIANCE WITH NOTICE REQUIREMENT

Pursuant to MD Code, Tax-Property Article, § 14-833(e) and MD Rule 14-502 I, Elimelech Baruch, hereby certify that the building or structures on the property that is the subject of this action has been certified by the appropriate government agency to require, or within 6 months shall require, substantial repairs to comply with the applicable building code, and therefore no notice is required before the filing of this complaint.

I further certify that the amount that shall be paid to redeem the property complies with the requirements of Code, Tax Property Article, § 14-833 (a-1)(3).

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.

Elimelech Baruch
10/11/2023

EXHIBIT E

EPCOT MD LLC

Plaintiff

v.

DOROTHY HENRY (LIFE TENANT)

Kevin Eric Fishkind

HENRY SMITH (REMAINDERMAN)

City of Baltimore
S/O Michael Moiseyev
Director Of Finance

State of Maryland
Office of the Attorney General
S/O Anthony G. Brown Attorney General

The Mayor and City Council of Baltimore City
S/O Ebony Thompson
City Solicitor

Department of Public Works
S/O Jason W. Mitchell
Director of DPW

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: 2129 W FAIRMOUNT AVE BALTIMORE 21223 being know as Ward - 20 Section - 14 Block - 0190 Lot - 079 with a legal description of 13X95 on the Tax Roll of the Director of Finance

Defendants

* IN THE
* CIRCUIT COURT
* FOR
* BALTIMORE CITY
* Case No. _____

* * * * *

ORDER OF PUBLICATION

The object of this proceeding is to secure foreclosure of all rights of redemption from tax sale on the property known as 2129 W FAIRMOUNT AVE BALTIMORE 21223 being know as Ward - 20 Section - 14 Block - 0190 Lot - 079 with a legal description of 13X95 on the Tax Roll of

the Director of Finance sold by the Finance Officer of BALTIMORE CITY, State of Maryland to EPCOT MD LLC, the Plaintiff.

A description of the property in substantially the same form as the description appearing on the Certificate of Tax Sale is as follows: 2129 W FAIRMOUNT AVE BALTIMORE 21223 being know as Ward - 20 Section - 14 Block - 0190 Lot - 079 with a legal description of 13X95 on the Tax Roll of the Director of Finance.

The Complaint states among other things that the amount necessary for redemption has not been paid.

It is thereupon this ___ day of _____, 20____, by the Circuit Court for BALTIMORE CITY, ORDERED that notice be given by the insertion of a copy of this Order in some newspaper having a general circulation in once a week for three consecutive weeks, warning all persons interested in the property to appear before this Court by the _____ day of _____, _____ and redeem the property and answer the Complaint or thereafter a final judgment will be entered foreclosing all rights of redemption in the property, and vesting title to the property in Plaintiff, free of all liens and encumbrances.

Judge, Circuit Court for BALTIMORE CITY

EPCOT MD LLC

Plaintiff

v.

DOROTHY HENRY (LIFE TENANT)

Kevin Eric Fishkind

HENRY SMITH (REMAINDERMAN)

City of Baltimore
S/O Michael Moiseyev
Director Of Finance

State of Maryland
Office of the Attorney General
S/O Anthony G. Brown Attorney General

The Mayor and City Council of Baltimore City
S/O Ebony Thompson
City Solicitor

Department of Public Works
S/O Jason W. Mitchell
Director of DPW

All persons that have or claim to have any
interest in the Property described as follows:
2129 W FAIRMOUNT AVE BALTIMORE
21223 being know as Ward - 20 Section - 14
Block - 0190 Lot - 079 with a legal description
of 13X95 on the Tax Roll of the Director of
Finance

Defendants

* IN THE
* CIRCUIT COURT
* FOR
* BALTIMORE CITY
* Case No. _____

* * * * *

ORDER OF PUBLICATION

The object of this proceeding is to secure foreclosure of all rights of redemption from tax sale on the property known as 2129 W FAIRMOUNT AVE BALTIMORE 21223 being know as Ward - 20 Section - 14 Block - 0190 Lot - 079 with a legal description of 13X95 on the Tax Roll of

the Director of Finance sold by the Finance Officer of BALTIMORE CITY, State of Maryland to EPCOT MD LLC, the Plaintiff.

A description of the property in substantially the same form as the description appearing on the Certificate of Tax Sale is as follows: 2129 W FAIRMOUNT AVE BALTIMORE 21223 being know as Ward - 20 Section - 14 Block - 0190 Lot - 079 with a legal description of 13X95 on the Tax Roll of the Director of Finance.

The Complaint states among other things that the amount necessary for redemption has not been paid.

It is thereupon this ___ day of _____, 20____, by the Circuit Court for BALTIMORE CITY, ORDERED that notice be given by the insertion of a copy of this Order in some newspaper having a general circulation in once a week for three consecutive weeks, warning all persons interested in the property to appear before this Court by the _____ day of _____, _____ and redeem the property and answer the Complaint or thereafter a final judgment will be entered foreclosing all rights of redemption in the property, and vesting title to the property in Plaintiff, free of all liens and encumbrances.

Judge, Circuit Court for BALTIMORE CITY

EPCOT MD LLC

Plaintiff

v.

DOROTHY HENRY (LIFE TENANT)

Kevin Eric Fishkind

HENRY SMITH (REMAINDERMAN)

City of Baltimore
S/O Michael Moiseyev
Director Of Finance

State of Maryland
Office of the Attorney General
S/O Anthony G. Brown Attorney General

The Mayor and City Council of Baltimore City
S/O Ebony Thompson
City Solicitor

Department of Public Works
S/O Jason W. Mitchell
Director of DPW

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: 2129 W
FAIRMOUNT AVE BALTIMORE 21223
being know as Ward - 20 Section - 14 Block -
0190 Lot - 079 with a legal description of 13X95
on the Tax Roll of the Director of Finance

Defendants

* IN THE
* CIRCUIT COURT
* FOR
* BALTIMORE CITY
* Case No. _____

* * * * *

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0709 - 2129 W FAIRMOUNT AVE - 2023

the Director of Finance sold by the Finance Officer of BALTIMORE CITY, State of Maryland to EPCOT MD LLC, the Plaintiff.

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The Complaint states among other things that the amount necessary for redemption has not been paid.

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Judge, Circuit Court for BALTIMORE CITY

EXHIBIT F



September 26, 2023

Yisroel A. Schaffel
9505 Reisterstown Road, Suite 2NW
Owings Mills, MD 21117

RE : 2129 W. Fairmount Avenue

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 2129 W. Fairmount Avenue known as **Block 0190 Lot 079** 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.

09/27/2023

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