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**Pro Hac Vice* pending

LYNETTE JOHNSON,

Plaintiff,

v.

CITY OF EAST ORANGE;
ANNMARIE CORBITT, in her official
capacity as Collector of Taxes, and
TED R. GREEN, in his official
capacity as Mayor of East Orange,

Defendants.

**SUPERIOR COURT OF NEW
JERSEY
LAW DIVISION, ESSEX COUNTY
DOCKET NO. _____**

COMPLAINT

JURY TRIAL DEMANDED

Plaintiff, Lynette Johnson, by way of Complaint against Defendants, says:

PRELIMINARY STATEMENT

This lawsuit seeks to vindicate the constitutional and common law rights of Lynette Johnson. Specifically, it seeks to protect her rights under the New Jersey Constitution, which requires that government only take property for a public use and

with just compensation. This lawsuit also alleges that the City of East Orange, acting pursuant to New Jersey's Tax Sale Law, N.J.S.A. § 54:5-1, *et seq.*, has taken and inequitably retained funds that rightfully belong to Ms. Johnson under the doctrine of unjust enrichment.

PARTIES

1. Plaintiff Lynette Johnson is a resident of Newark, New Jersey. A mother of eight and grandmother of more than 20, she is the former owner of commercial real property which the City of East Orange foreclosed upon to collect a debt worth far less than the property itself. She is injured by the City of East Orange's unconstitutional and inequitable seizure of title and her equity (property value minus encumbering debts) built up in her property.

2. Defendant City of East Orange is a political subdivision of the State of New Jersey. Through its Collector of Taxes, Defendant Annmarie Corbitt, and its Mayor, Ted R. Green, it is ultimately responsible for the collection of real property taxes within the city and for taking and selling property if taxes remain unpaid.

JURISDICTION

3. The property at issue in this case is located within Essex County.

4. The law division of the Superior Court has jurisdiction over inverse condemnation claims. *Schiavone Const. Co. v. Hackensack Meadowlands Dev. Comm'n*, 98 N.J. 258, 266 (1985); *see* N.J.S.A. 20:3-5; N.J.S.A. 20:3-2(e).

FACTUAL ALLEGATIONS

5. Plaintiff Lynette Johnson immigrated to the United States from Guyana in 1993. Since 1994 she has owned residential property at 68 S. Devine Street in Newark New Jersey, where she has been living—and paying property taxes—ever since.

6. In March of 2014, with the intent of continuing her family's entrepreneurial tradition, Ms. Johnson purchased property at 250 Tremont Avenue in East Orange, New Jersey, for \$55,000 ("the Property").

7. The Property consists of Block No. 773, Lot No. 43, in Essex County. A copy of the recorded deed is attached as Exhibit A.

8. At the time of purchase, the commercially zoned Property contained a vacant commercial structure.

9. Ms. Johnson purchased the property with the intent of renovating the structure and allowing two of her adult children to operate their existing businesses on the premises. Her son, Alton, would open and operate a grocery-deli on one side of the premises, while her daughter, Shevon, would use the other as a storefront for her existing shipping business.

10. Before closing on the Property, Ms. Johnson signed a Letter of Agreement regarding the Property with the City of East Orange. The document listed Ms. Johnson's mailing address, in bold and italicized typeface, as "68 S. Devine Street, Newark, NJ 07106."

11. On or about October 24, 2014, Ms. Johnson hired architect and planner Gary I. Segal, R.A., to design and construct renovations on the Property. Ms. Johnson paid thousands of dollars for his services.

12. As is customary for such work, Mr. Segal placed a sign on the front door of the Property, visible from the street, which announced in large letters his association with the building as “Architect & Planner” and included his business phone number.

13. Ms. Johnson never received any notice from the City that taxes had been assessed or were due against the Property.

14. On information and belief, the City never mailed notice of tax assessments on the Property to Ms. Johnson’s residential mailing address at 68 S. Devine Street, Newark, NJ 07106.

15. Distraught and pre-occupied with her husband’s worsening illness, and having not received any notice of tax assessment, Ms. Johnson unwittingly neglected to pay the 2015 taxes assessed on the Property.

TAX LIEN SALE

16. On October 1st, 2015, at a public sale of municipal property tax liens, Annmarie Corbitt, the Collector of Taxes for the City, sold the tax lien on the Property to the City for \$4,787.76, which was the total amount of taxes, interest, penalties, and costs then owing. The City did not pay any premium to purchase the tax lien. A copy of the Tax Lien Certificate is attached as Exhibit B.

17. The purchase was for the maximum rate of redemption interest at the rate of 18%.

18. City officials had ready access to documentation of Ms. Johnson's correct residential mailing address.

19. Despite this, Ms. Johnson never received any notice from the City regarding the tax lien sale.

20. On information and belief, the City never mailed notice of the tax lien sale to Ms. Johnson's residential mailing address in Newark, New Jersey.

21. On October 15, 2015, Ms. Johnson received a Construction Permit issued by the City's Building Division, Control no. 39675, Permit no. 20151097, indicating the City's permission to proceed with roofing and siding work. She paid \$1,914 in fees to acquire the permit. A copy of the Construction Permit is attached as Exhibit C.

22. At no point in the permit process did the City or any of its officials inform her or her agents of the tax lien that had been placed on the Property.

FORECLOSURE PROCEEDINGS

23. On or about September 7, 2017, the City instituted a foreclosure action against the Property by filing a Complaint in the Superior Court of New Jersey, Essex County, Chancery Division, Docket No. F-020807-17.

24. According to a Proof of Mailing filed by the City, no notice of the action was ever mailed to Ms. Johnson's residential mailing address at 68 S. Devine Street

in Newark, NJ, where she has resided for nearly three decades. A true and correct copy of the Proof of Mailing is attached as Exhibit D.

25. According to the Proof of Mailing, notice of the action was mailed to the Property at 250 Tremont Avenue.

26. However, no mailbox was posted on the Property.

27. As a result, all notice attempts mailed to the Property were returned undeliverable to sender. Exhibit E.

28. No notice of the action was ever mailed to Gary Segal, Ms. Johnson's hired architect, who had signs posted on the Property at the time that the action was commenced.

29. On information and belief, the City never called Mr. Segal's phone number posted on the front door of the Property to alert Ms. Johnson that she was in danger of losing her property.

30. Ms. Johnson did not receive actual notice of the action at any time during its pendency.

31. Ms. Johnson did not know she was delinquent on her property taxes for the Property.

32. Ms. Johnson did not know she was in danger of losing her property to foreclosure.

33. On February 13, 2018, the Superior Court issued an Order for Final Judgment barring Ms. Johnson's right of redemption over the Property.

34. According to a Certification of Mailing filed by the City, no notice of the judgment was mailed to Lynette Johnson's residential address in Newark. A partial copy of the Certification of Mailing is attached as Exhibit F.

35. According to a Certification of Mailing filed by the City, no notice of the judgment was mailed to Gary Segal.

36. At the time of the foreclosure judgment, the total tax liability on the Property, including interest, costs, and fees, was \$19,860.83.

37. Ms. Johnson did not receive actual notice of the Judgment of Foreclosure until on or about March 16, 2018.

38. Upon first receiving actual notice of the foreclosure, Ms. Johnson or her agents went directly and immediately to City Hall to offer to pay the outstanding taxes. City officials refused to accept payment, saying it was too late to redeem the Property, and that the Property now belonged to the City.

SUBSEQUENT SALE

39. By Resolution No. I-91 adopted by the City on March 19, 2018, the City authorized the Property to be sold at public auction.

40. Resolution No. I-91 indicates that the Property is "surplus propert[y] and not needed for public use."

41. On April 5, 2018, the City, through its Mayor Ted R. Green, sold the Property to private, third-party purchasers at a public auction for the purchase price of \$101,000.

42. That amount exceeded Ms. Johnson's total debt to the County including all interest, penalties, and fees by \$81,139.17. In other words, the County took more than five times the amount it was owed.

43. The City retained this entire surplus and did not pay anything to Ms. Johnson for her Property.

44. All necessary parties have been made party to this action.

45. No administrative remedies are available.

**COUNT I: Inverse condemnation - violation of N.J. Const. art. I, § 20,
for taking without just compensation**

46. The prior paragraphs are incorporated herein.

47. Under the Takings Clause of the New Jersey Constitution of 1947, Article I, Section 20, the government may not take private property for public use without just compensation.

48. The Takings Clause also prohibits the taking of more than is necessary to effectuate that public use.

49. When government physically invades or takes private property without paying compensation, it effects a *per se* taking.

50. Pursuant to the New Jersey Tax Sale Law, the City forecloses the right to redemption and takes absolute title to tax-indebted private property like the Property in this case—no matter how small the debt or how valuable the property. *See* N.J.S.A. § 54:5-104.64. The City then sells the property and keeps all proceeds in excess of any outstanding tax debts under the Local Lands and Buildings Law, N.J.S.A. § 40A:12-1, *et seq.*

51. The City took the Property, which was worth more than the property tax debt owing on it, and it did not pay just compensation for the value of the Property that exceeded Ms. Johnson's debt to the City.

52. The City did not institute condemnation proceedings under the Eminent Domain Act of 1971, which governs all condemnation cases, including inverse condemnation. *See* N.J.S.A. 20:3–1.

53. When the City sold the Property for \$101,000 it did not refund the surplus proceeds—\$81,139.17—to Ms. Johnson, even though she has a traditional property right in those proceeds.

54. The City offered no opportunity to Ms. Johnson to claim the surplus proceeds from the sale of her Property.

55. This claim is ripe for immediate resolution in this court.

**COUNT II: Inverse condemnation: Violation of N.J. Const. art. IV, § 6,
¶ 3, for taking without just compensation**

56. The prior paragraphs are incorporated herein.

57. The New Jersey Constitution of 1947 provides that an agency of a political subdivision of the State which may be “empowered to take or otherwise acquire private property for any public . . . use, may be authorized by law to take or otherwise acquire a fee simple absolute . . . ; but such taking shall be with just compensation.”

58. For the reasons stated in paragraphs 47–55 above, the City violated Article IV, Section 6, Paragraph 3, of the New Jersey Constitution of 1947.

COUNT III: Unjust Enrichment

59. The prior paragraphs are incorporated herein.

60. Under the doctrine of unjust enrichment, a person who receives a benefit from another which would be unjust to retain may be ordered to make restitution.

61. The City knew of Ms. Johnson's residential address in Newark, where she has lived for nearly three decades, but neglected to ever send any notice of the tax assessment, tax lien sale, or foreclosure action to that address.

62. The City knew that Ms. Johnson desired to keep the Property because it issued her a construction permit for renovations on the Property on October 15, 2015—two weeks after the tax sale of the Property.

63. The City accepted Ms. Johnson's total payments of \$1,914 for processing the Construction Permit. That payment was approximately 40% of the \$4,787.76 then needed to pay off the tax lien and redeem the Property. Yet at no point in the permit process did anyone at the City mention anything to Ms. Johnson or her agents about the tax lien or the possibility of foreclosure.

64. The City had Ms. Johnson's phone number on file as evidenced by its listing on the construction permit.

65. The City should have known that Ms. Johnson had contracted with architect Gary Segal to renovate the property, as he had a sign posted on the Property. Yet the City never sought to inform Ms. Johnson through Mr. Segal, nor did it mail notice of the tax foreclosure to Mr. Segal.

66. Ms. Johnson had no actual knowledge of the tax lien or of the foreclosure action until after the final judgment of foreclosure was rendered.

67. The City capitalized on this lack of knowledge for its own profit and gained a windfall of \$81,139.17 at Ms. Johnson's expense.

68. Ms. Johnson acted in good faith and would have paid the tax debt if she had known about it. Indeed, upon first receiving actual notice of the foreclosure, Ms. Johnson or her agents immediately traveled to City Hall to try and pay the outstanding tax amount. City officials refused to accept this payment.

69. The City received a benefit from Ms. Johnson in the amount of \$81,139.17. Because this money is in no way related to any injury suffered by the County as a result of the tax delinquency, it is unjust for the County to retain it.

REQUEST FOR RELIEF

WHEREFORE, Plaintiff respectfully requests relief as follows:

- a. An entry of judgment declaring that the Tax Sale Law as applied to Ms. Johnson violates Article I, Section 20, as well as Article IV, Section 6, Paragraph 3 of the New Jersey Constitution of 1947 by allowing the government to keep the surplus proceeds from the sale of property;
- b. An award of just compensation, as applicable, in an amount to be determined at trial;
- c. An award of restitution in an amount to be determined at trial;
- d. An award of reasonable costs and expenses, including attorney fees, pursuant to N.J.S.A. § 20:3-26; and
- e. All further legal and equitable relief as the Court may deem just and proper.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands Trial by a jury on all of the triable issues of this complaint, pursuant to New Jersey Court Rules 1:8-2(b) and 4:35-1(a).

DATED: December 1, 2021.

Respectfully submitted,

DAVID J. DEERSON*
CHRISTINA M. MARTIN*
PACIFIC LEGAL FOUNDATION
555 Capitol Mall, Suite 1290
Sacramento, CA 95814
Tel.: (916) 419-7111
DDeerson@pacificlegal.org
CMartin@pacificlegal.org

s/Steven M. Simpson
STEVEN M. SIMPSON
New Jersey Bar No. 017081994
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Tel.: (202) 888-6881
SSimpson@pacificlegal.org

**Pro hac vice pending*

Counsel for Plaintiff

CERTIFICATION OF NO OTHER ACTIONS

Pursuant to Rule 4:5-1, it is hereby stated to the best of my knowledge and belief that the matter in controversy is not the subject of any other action pending in any other court or of a pending arbitration proceeding.

Further, other than the parties set forth in this complaint, I know of no other party that should be joined pursuant to R. 4:28 or who is subject to joinder pursuant to R. 4:29-1(b) because of potential liability to any party on the basis of the same transactional facts. I further certify that confidential personal identifiers have been redacted from documents now submitted to the court and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b). Subject to the foregoing, I recognize the continuing obligation of each party to file and serve on all parties that should be joined herein. I recognize the continuing obligation of each party to file and serve on all parties and the court an amended certification, if there is a change in the facts stated in this original certification.

DATED: December 1, 2021.

s/Steven M. Simpson
STEVEN M. SIMPSON

EXHIBIT A

RECORDING INFORMATION SHEET

ESSEX COUNTY REGISTER'S OFFICE
HALL OF RECORDS , ROOM 130
465 MARTIN LUTHER KING Jr. Blvd
NEWARK NJ 07102

INSTRUMENT NUMBER:
14024206

DOCUMENT TYPE :
DEED

Official Use Only

WILLIAM NARVAEZ
DEPUTY REGISTER
ESSEX COUNTY, NJ

INSTRUMENT NUMBER
14024206
RECORDED ON
April 7, 2014 09:42 am
BOOK:12489 PAGE:7694

AD

Return Address (for recorded documents)
DELLITALIA, AFFINITO AND SANTOLA
ATTORNEYS AT LAW

18 TONY GALENTO PLAZA
ORANGE NJ 07050

No. Of Pages (excluding Summary Sheet) 5

Recording Fee (excluding Transfer Tax) \$80.00

Realty Transfer Tax \$220.00

Amount Charged (Check # 1168) \$300.00

Municipality EAST ORANGE

Parcel Information
Block 773
Lot 43

First Party Name ALLEN TUCKER

Second Party Name LYNETTE JOHNSON

CONSIDERATION (R) \$55,000.00

MAIL COPY _____

NO COPY _____

ENVELOPE _____

Additional Information (Official Use Only)

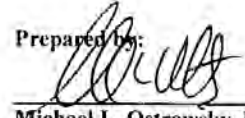
ADDITIONAL STAMPINGS _____

***** DO NOT REMOVE THIS PAGE. *****
COVER SHEET (DOCUMENT SUMMARY FORM) IS PART OF ESSEX COUNTY FILING RECORD
***** RETAIN THIS PAGE FOR FUTURE REFERENCE. *****

Record & Return to:
 Stacy Santola, Esq.
 Dell'Italia Affinito & Santola
 18 Tony Galento Plaza
 Orange, NJ 07050

DEED

Prepared by:


 Michael L. Ostrowsky, Esq.

This Deed is made on MARCH 18, 2014,

Between **Allen Tucker**

whose forwarding address is 3440 S. Ocean Blvd., Apt. 502 S, Palm Beach, FL 33480
 referred to as the **Grantor**,

AND

Lynette Johnson

whose address is about to be 250 Tremont Avenue, East Orange, NJ 07019
 referred to as the **Grantee**.

The words "Grantor" and "Grantee" shall mean all Grantors and all Grantees listed above.

Transfer of Ownership. The Grantor grants and conveys (transfers ownership of) the property (called the "Property") described below to the Grantee. This transfer is made for the sum of **FIFTY FIVE THOUSAND AND 00/100 DOLLARS (\$55,000.00)**. The Grantor acknowledges receipt of this money.

Tax Map Reference. Municipality of East Orange, Block No. 773, Lot No. 43,
 Account No.

☐ No property tax identification number is available on the date of this deed.

Property. The property consists of the land and all the buildings and structures on the land in the Municipality of East Orange, County of Essex and the State of New Jersey.

Being the same property conveyed to Grantor(s) by deed from Celebrity Urban Development, LLC dated October 25, 2012, recorded November 7, 2012 in the Essex County Clerk/Register's Office in Book 12399, Page 5950.

This conveyance is subject to easements and restrictions of record and such facts as an accurate survey may disclose.

☒ Please see attached Legal Description annexed hereto and made a part hereof.

Promises by Grantor. The Grantor promises that the Grantor has done no act to encumber the property. This promise is called a "covenant as to grantor's acts" (N.J.S.A. 46:4-6). This promise means that the Grantor has not allowed anyone else to obtain any legal rights which affect the property (such as by making a mortgage or allowing a judgment to be entered against the Grantor).

TITLE INSURANCE COMMITMENT

Issued by **Trident Abstract Title Agency, LLC**
AGENT FOR WESTCOR LAND TITLE INSURANCE COMPANY

Commitment Number: TA-125849

SCHEDULE C
LEGAL DESCRIPTION

ALL that certain lot, piece or parcel of land, with the buildings and improvements thereon erected, situate, lying and being in the City of East Orange, in the County of Essex, State of New Jersey:

BEGINNING at the point formed by the intersection of the Northerly sideline of Tremont Avenue (50 feet wide) and the Easterly sideline of Bedford Street (50 feet wide) and running; thence

1. Along the Northerly sideline of Trenton Avenue, South 59 degrees 03 minutes 00 seconds East 75.00 feet to a point; thence
2. North 30 degrees 57 minutes 00 seconds East, 75.00 feet to a point; thence
3. North 59 degrees 03 minutes 00 seconds West, 40.00 feet to a point; thence
4. South 30 degrees 57 minutes 00 seconds West, 0.25 feet to a point; thence
5. North 59 degrees 03 minutes 00 seconds West, 35.00 feet to the Easterly sideline of Bedford Street; thence
6. Along said sideline of Bedford Street, South 30 degrees 57 minutes 00 seconds West, 74.75 feet to the point and place of BEGINNING.

Note for Information Only:

Also known as Lot 43, Block 773, on the official tax map of City of East Orange, County of Essex, in the State of New Jersey.

The street address of the property is: 250 Tremont Avenue, East Orange, NJ 07019.

Signatures. The Grantor signs this Deed as of the date at the top of the first page.

Witnessed by:

Ellen Mulligan

Allen Tucker

STATE OF NEW JERSEY
COUNTY OF UNION

I Certify that on MARCH 18, 2014, Allen Tucker, personally came before me and stated to my satisfaction, that this person (or if more than one, each person):
(a) is named in and personally signed this Deed;
(b) signed, sealed and delivered this Deed as his or her act and deed; and
(c) made this Deed for: \$55,000.00 as the full and actual consideration paid or to be paid for the transfer of title. (Such consideration is defined in N.J.S.A. 46:15-5.)

HAROLD A. SELTZER
Notary Public
Notary Public of New Jersey
My Commission Expires Oct. 22, 2015

R & L:

DELLITALIA, AFFINITO AND SANTOLA
ATTORNEYS AT LAW
18 TONY GALENTO PLAZA
ORANGE, NEW JERSEY 07050



State of New Jersey
NONRESIDENT SELLER'S TAX DECLARATION
 (C.55, P.L. 2004)

GIT/REP-1
 (6-10)

(Please Print or Type)

SELLER(S) INFORMATION

Name(s)

Allen Tucker

Street Address:

3440 S. Ocean Blvd., Apt. 502 S

City, Town, Post Office:

Palm Beach

State

FL

Zip Code

33480

PROPERTY INFORMATION (Brief Property Description)

Block(s)

773

Lot(s)

43

Qualifier

Street Address: 250 Tremont Avenue,

City, Town, Post Office:

East Orange

State

New Jersey

Zip Code

07019

Seller's Percentage of Ownership

100%

Consideration

\$55,000.00

Closing Date

March 25, 2014

SELLER(S) DECLARATION

The undersigned understands that this declaration and its contents may be disclosed or provided to the New Jersey Division of Taxation and that any false statement contained herein could be punished by fine, imprisonment, or both. I furthermore declare that I have examined this declaration and, to the best of my knowledge and belief, it is true, correct and complete. By checking this box ☐ I certify that the Power of Attorney to represent the seller(s) has been previously recorded or is being recorded simultaneously with the deed to which this form is attached.

Date

Date

MARCH 18, 2014

Signature (Seller) Please indicate if Power of Attorney or Attorney in Fact

Signature (Seller) Please indicate if Power of Attorney or Attorney in Fact

(Detach on dotted line)

MUST SUBMIT IN DUPLICATE

AFFIDAVIT OF CONSIDERATION FOR USE BY SELLER

(Chapter 49, P.L. 1968, as amended through Chapter 33, P.L. 2006) (N.J.S.A. 46:15-5 et seq.)

BEFORE COMPLETING THIS AFFIDAVIT, PLEASE READ THE INSTRUCTIONS ON THE REVERSE SIDE OF THIS FORM.

STATE OF NEW JERSEY

SS. County

Municipal Code

COUNTY ESSEX

0706

FOR RECORDER'S USE ONLY

Consideration \$ 51,000.00RTF paid by seller \$ 220.00Date 4-7-14 By Jc

*Use symbol "C" to indicate that fee is exclusively for county use.

MUNICIPALITY OF PROPERTY LOCATION EAST ORANGE(1) **PARTY OR LEGAL REPRESENTATIVE** (See instructions # 3 and # 4 on reverse side)Deponent, Allen Tucker, being duly sworn according to law upon his/her oath

(Name)

deposes and says that he/she is the Grantor in a deed dated March 18, 2014 transferring

(Grantor, Legal Representative, Corporate Officer, Officer of Title Company, Lending Institution, etc.)

real property identified as Block number 773 Lot number 43 located at250 Tremont Avenue, East Orange, NJ 07019 and annexed thereto.

(Street Address, Town)

(2) **CONSIDERATION** \$55,000.00 (See Instructions # 1 & 5 on reverse side) ☐ no prior mortgage to which property is subject.(3) Property transferred is Class 4A 4B 4C (circle one) If property transferred is Class 4A, calculation in Section 3A below is required.(3A) **REQUIRED CALCULATION OF EQUALIZED VALUATION FOR ALL CLASS 4A (COMMERCIAL) PROPERTY**

TRANSACTIONS: (See Instructions #5A and 7 on reverse side)

Total Assessed Valuation ÷ Director's Ratio = Equalized Assessed Valuation

\$102,800.00 ÷ 86.77% = \$118,474.13

If Director's Ratio is less than 100%, the equalized valuation will be an amount greater than the assessed value. If Director's Ratio is equal to or in excess of 100%, the assessed value will be equal to the equalized valuation.

(4) **FULL EXEMPTION FROM FEE** (See Instruction # 8 on reverse side)

Deponent states that this deed transaction is fully exempt from the Realty Transfer Fee imposed by C. 49, P.L. 1968, as amended through C. 66, P.L. 2004, for the following reason(s). Mere reference to exemption symbol is insufficient. Explain in detail.

(Enter Info Here)

(5) **PARTIAL EXEMPTION FROM FEE** (See Instruction #9 on reverse side)

NOTE: All boxes below apply to grantor(s) only. ALL BOXES IN APPROPRIATE CATEGORY MUST BE CHECKED. Failure to do so will void claim for partial exemption. Deponent claims that this deed transaction is exempt from State portions of the Basic, Supplemental and General Purpose Fees, as applicable, imposed by C. 176, P.L. 1975, C. 113, P.L. 2004 and C. 66, P.L. 2004 for the following reason(s):

A. **SENIOR CITIZEN** Grantor(s) ☐ 62 years of age or over. * (See Instruction #9 on reverse side for A or B)B. **BLIND PERSON** Grantor(s) ☐ legally blind or ***DISABLED PERSON** Grantor(s) ☐ permanently and totally disabled ☐ receiving disability payments ☐ not gainfully employed*

Senior citizens, blind persons, or disabled persons must also meet all of the following criteria.

☐ Owned and occupied by grantor(s) at time of sale.☐ Resident of the State of New Jersey.☐ One or two-family residential premises.☐ Owners as joint tenants must all qualify.

*IN CASE OF HUSBAND AND WIFE, PARTNERS IN A CIVIL UNION COUPLE, ONLY ONE GRANTOR NEED TO QUALIFY IF TENANTS BY THE ENTIRETY.

C. **LOW AND MODERATE INCOME HOUSING** (See Instruction #9 on reverse side)☐ Affordable according to H.U.D. standards.☐ Reserved for occupancy.☐ Meets income requirements of region.☐ Subject to resale controls.(6) **NEW CONSTRUCTION** (See Instructions #2, #10 and #12 on reverse side)☐ Entirely new improvement.☒ Not previously occupied.☐ Not previously used for any purpose.☐ "NEW CONSTRUCTION" printed clearly at top of first page of the deed.(7) **RELATED LEGAL ENTITIES TO LEGAL ENTITIES** (Instructions #5, #12, #14 on reverse side)☐ No prior mortgage assumed or to which property is subject at time of sale.☐ No contributions to capital by either grantor or grantee legal entity.☐ No stock or money exchanged by or between grantor or grantee legal entities.

(8) Deponent makes this Affidavit to induce county clerk or register of deeds to record the deed and accept the fee submitted herewith in accordance with the provisions of Chapter 49, P.L. 1968, as amended through Chapter 33, P.L. 2006.

Subscribed and Sworn to before me

On MARCH 18, 2014

Signature of Deponent

3440 S. Ocean Blvd. Apt. 502 S. Palm Beach FL

33480

Deponent Address

Allen Tucker

Grantor Name

3440 S. Ocean Blvd. Apt. 502 S. Palm Beach, FL

33480

Grantor Address at Time of Sale

Michael L. Ostrowsky
Bressler, Amery & Ross

Name/Company of Settlement Officer

Notary Public

HAROLD A. SELTZER

Notary Public of New Jersey

My Commission Expires Oct. 22, 2015

Last 3 Digits in Grantor's Social Security Number XXX-XX-X737

FOR OFFICIAL USE ONLY

Instrument Number _____ County _____

Deed Number _____ Book _____ Page _____

Deed Dated _____ Date Recorded _____

County Recording Officers shall forward one copy of each RTE-1 form when Section 3A is completed to:

STATE OF NEW JERSEY

PO BOX 251, TRENTON, NJ 08695-0251

ATTENTION: REALTY TRANSFER FEE UNIT

The Director of the Division of Taxation in the Department of the Treasury has prescribed this form as required by law, and may not be altered or amended without prior approval of the Director. For information on the Realty Transfer Fee or to print a copy of this Affidavit, visit the Division's website at:

www.state.nj.us/treasury/taxation/lpt/localtax.shtml

EXHIBIT B

DANA RONE
ESSEX COUNTY REGISTER OF DEEDS & MORTGAGES



Hall of Records
465 Martin Luther King Jr Blvd
Room 130
Newark, NJ 07102
(973) 621-4960

***RETURN DOCUMENT TO:**
EAST ORANGE TAX COLLECTOR
CITY HALL
44 CITY HALL PLAZA
EAST ORANGE, NJ 07019

Instrument Number - 2015091486

Recorded On 11/24/2015 At 5:48:21 PM

* Instrument Type - MORTGAGE

Invoice Number - 19550 User ID: MC

* Mortgagor - JOHNSON, LYNETTE

* Mortgagee - EAST ORANGE, CITY OF

* Customer - EAST ORANGE TAX COLLECTOR

***Total Pages - 3**

*** FEES**

NJ PRESERVATION ACCOUNT	\$5.00
REGISTER RECORDING FEE	\$3.00
HOMELESSNESS TRUST FUND	\$3.00
TOTAL PAID	\$11.00

I hereby CERTIFY that this document is
Recorded in the Register of Deeds & Mortgages Office
of Essex County, New Jersey

Dana Rone
Register of Deeds & Mortgages

THIS IS A CERTIFICATION PAGE

Do Not Detach

THIS PAGE IS NOW PART OF THIS LEGAL DOCUMENT

* - Information denoted by an asterisk may change during the verification process and may not be reflected on this page.

INSTRUMENT NUMBER - 2015091486



CERTIFICATE OF SALE

FOR UNPAID MUNICIPAL LIENS

CERTIFICATE

No. 15-00545

Prepared By: I, **Annmarie Corbitt**, CITY of **EAST ORANGE**, COLLECTOR OF TAXES of the taxing district of the COUNTY of **Essex** and State of New Jersey, do hereby certify that on the **1st** day of **October**, **2015**, at a public sale of lands for delinquent municipal liens, pursuant to the Revised Statutes of New Jersey, 1937, Title 54, Chapter 5, and the amendments and supplements thereto sold to **CITY OF EAST ORANGE** on repayment of the amount of sale, together with interest at the rate of **18.00** per centum per annum from the date of sale, and the costs incurred by the purchaser as defined by whose address is **44 CITY HALL PLAZA, EAST ORANGE, NJ 07019** municipal authority charges accruing after for **Four Thousand Seven Hundred Eighty Seven** dollars and **Seventy Six** cents, the land in said taxing district described as Block No. **773** Lot No. **43** and known as **250 TREMONT AVE.** , on the tax duplicate thereof and assessed thereon to **JOHNSON, LYNETTE**

THE AMOUNT OF THE SALE WAS MADE UP OF THE FOLLOWING ITEMS:

	AMOUNT	INTEREST	TOTAL
Taxes For: 2014			
BE IT REMEMBERED, that on this	3,831.35	597.98	4,429.33
Water	181.71	10.94	192.65
Assessments For Improvements			
Total Cost of Sale	165.78		165.78
Total			4,787.76
Premium (if any) Paid	0.00		

Said sale is subject to redemption on repayment of the amount of sale, together with interest at the rate of **18.00** per centum per annum from the date of sale, and the costs incurred by the purchaser as defined by statute. The sale is subject to municipal charges accruing after **December 31, 2014** and assessment municipal authority charges accruing after **December 31, 2014** dollars and interest thereon. installments not yet due, amounting to **0.00**

IN WITNESS WHEREOF, I have hereunto set my hand and seal this **5th** day of **October**, **2015**

STATE OF NEW JERSEY
COUNTY OF: **Essex**

Annmarie Corbitt
COLLECTOR OF TAXES

BE IT REMEMBERED, that on this **5th** day of **October**, **2015** before me a Notary Public of New Jersey, personally appeared **Annmarie Corbitt** the Collector of Taxes of the taxing district of **City of East Orange** in the County of **Essex** who, I am satisfied, is the individual described herein, and who executed the above Certificate of Sale; and I having made known to him the contents thereof, he thereupon acknowledged to me that he signed, sealed and delivered the same as his voluntary act and deed, for the uses and purposes therein expressed.

Prepared By: **Annmarie Corbitt**, PREPARER

Cheryl Hoffman
OFFICIAL SEAL
NOTARY PUBLIC - NEW JERSEY
My Comm. Expires **7/26/18**

NOTE: NJSA 46:15-3 requires that all signatures appearing on the certificate, those of the collector, the Notary Public who takes this acknowledgement, and the preparer shall be printed, typed or stamped underneath such signature the name of the person that signed.

AUTHORIZATION FOR CANCELLATION OF RECORD BY MUNICIPALITY

The within certificate has been duly paid and satisfied and the County Recording Officer is hereby authorized to cancel the same of record.

Name of Municipality

BY: _____
Mayor

ATTEST: _____
Municipal Clerk

(NJSA 46:18-6 & 54: 5-55)

Seal of Municipality to be affixed

East Orange Tax Collector
City Hall
44 City Hall Plaza
East Orange, NJ 07019

No. _____
Tax Sale Certificate

Collector of Taxes

Municipality of _____

County, New Jersey

To _____

Entered _____

Compared _____

Checked _____

Received in the Register Office of the County of _____

New Jersey

on the _____

day of _____

A.D. 20 _____

, at _____

o'clock in the _____

noon and _____

Recorded in Book _____

for said _____

County on Pages _____

AUTHORIZATION FOR CANCELLATION OF RECORD BY A PRIVATE CORPORATION

The within certificate has been fully paid and satisfied and the County Recording Officer is hereby authorized to cancel the same of record.

Name of Corporation

BY: _____
President

ATTEST: _____
Secretary

Corporate Seal to be affixed

AUTHORIZATION FOR CANCELLATION OF RECORD BY AN INDIVIDUAL

The within certificate has been fully paid and satisfied and the County Recording Officer is hereby authorized to cancel the same of record.

The above signature is certified to as genuine.

A Notary Public of New Jersey

Signature of Holder of Certificate

EXHIBIT C



CONSTRUCTION PERMIT

Date Issued 10/15/2015
Control # 38675
Permit # 20151097

IDENTIFICATION Block 773 Lot 43 Qualifier
Work Site Location 250 TREMONT AVE East Orange City, NJ Contractor JOHNSON, LYNETTE
Address 250 TREMONT AVE EAST ORANGE NJ 07017
Owner in Fee JOHNSON, LYNETTE
250 TREMONT AVE EAST ORANGE NJ 07017 Telephone 973 4166908
Telephone 973 4166908 Lic No or Bldgs Reg No
Federal Employee No

Is hereby granted permission to perform the following work:

- ☒ BUILDING ☐ PLUMBING ☐ LEAD HAZARD ABATEMENT
☐ ELECTRICAL ☐ FIRE PROTECTION ☐ DEMOLITION
☐ ELEVATOR DEVICES ☐ ASBESTOS ABATEMENT (Subchapter 8 only) ☐ OTHER

DESCRIPTION OF WORK

DOING OVER THE COMPLETE ROOF AND SIDING REMOVING PART OF SIDING
REPLACING WITH GLASS SNICKERING THE COMPLETE SIDING AS PER PLANS

Note: If construction does not commence within one (1) year of date of issuance, or if construction ceases for a period of six (6) months, this permit is void.

Estimated Cost of Work \$60,000

Construction Official

Date

UCC F170
equivalent 1/04

1 WHITE - INSPECTOR

2 CANARY - OFFICE

3 PINK - TAX ASSESSOR

4 GOLD - APPLICANT

PAYMENTS (Office Use Only)

Building	\$1,800
Electrical	\$0
Plumbing	\$0
Fire Protection	\$0
Elevator Devices	\$0
Other	\$0.00
DCA Training Fee	\$114
CO Fee	
Other	\$0
Total	\$1,914
Check No	N/A
Cash	\$0
Credit	\$0
Collected By	Kathy Cantwell

REQUIRED INSPECTIONS

Construction work must be inspected in accordance with the State Uniform Construction Code Regulations N.J.A.C. 5 23-2.18. This agency will carry out such periodic inspections during the progress of work as are necessary to insure that the work installed conforms with the requirements of the Uniform Construction Code.

The owner or other responsible person in charge of work must notify this agency when work is ready for any required inspections specified below. Requests for inspections must be made at least 24 hours prior to the time the inspection is desired. Inspections will be performed within three business days of the time for which they are requested. The work must not proceed in a manner which will preclude the inspection until it has been made and approval granted.

☐ Required inspections for all subcodes for one- and two-family dwellings are as follows:

1. The bottom of footing trenches before placement of footings, except that in cases of pile foundations, inspections shall be made in accordance with the requirements of the building subcode.
2. Foundations and all walls up to grade level prior to back filling.
3. All structural framing, connections, wall and roof sheathing and insulation, electrical rough wiring, panel and service installation, rough plumbing. The framing inspection shall take place after the rough electrical and plumbing inspections and after the installation of the heating, ventilation and/or air conditioning duct system. The insulation inspection shall be performed after all other subcode rough inspections and prior to the installation of any interior finish material.
4. Installation of all finished materials, sealings of exterior joints, plumbing piping, trim and fixtures, electrical wiring, devices and fixtures, mechanical systems equipment.

Additional required inspections for all subcodes of construction, for other than one- and two-family dwellings, are fire suppression systems, heat producing devices and Barrier Free subcode accessibility, if applicable.

Required special inspections: The applicant by accepting the permit will be deemed to have consented to these requirements.

A final inspection is required for each applicable subcode area before a final Certificate of Occupancy or Approval may be issued. The final inspections include the installation of all interior and exterior finish materials, sealing of exterior joints, mechanical system and other required equipment, electrical wiring, devices and fixtures, plumbing pipes, trim and fixtures, tests required by any provision of the adopted subcodes, Barrier Free accessibility, if applicable, and verification of compliance with NJAC 5 23-3.5, "Posting structures".

A complete copy of released plans must be kept on the job site.

If you do not understand any of this information, please ask.

EXHIBIT D

SCHEDULE 46RE: BLOCK 773 - LOT 43 / 250 TREMONT AVENUE - COMMERCIALASSESSED OWNER: LYNETTE JOHNSON

LYNETTE JOHNSON [Assessed Owner]
 250 Tremont Avenue [Property Address]
 East Orange, NJ 07018 [Address per Deed]
 ORDINARY MAIL/ [Address per Tax Office]
 CERTIFIED R.R.R. 7017 0190 0000 9678 1631

OWNER/OCCUPANT/TENANT
 250 Tremont Avenue [Property Address]
 East Orange, NJ 07018
 ORDINARY MAIL/
 CERTIFIED R.R.R. 7017 0190 0000 9678 1648

LYNETTE JOHNSON [Assessed Owner]
 c/o Clerk, Superior of NJ
 P.O. Box 971
 Trenton, NJ 08625
 ORDINARY MAIL/
 CERTIFIED R.R.R. 7017 0190 0000 9678 1655

LYNETTE JOHNSON [Assessed Owner]
 c/o ALLEN TUCKER
 3440 S. Ocean Blvd. Apt. 502 S
 Palm Beach, FL 33480
 ORDINARY MAIL/
 CERTIFIED R.R.R. 7017 0190 0000 9678 1662

LYNETTE JOHNSON [Assessed Owner]
 c/o STACY SANTOLA, ESQUIRE
 18 Tony Galento Plaza
 Orange, NJ 07050
 ORDINARY MAIL/
 CERTIFIED R.R.R. 7017 0190 0000 9678 1679

UNKNOWN OWNERS/UNKNOWN CLAIMANTS [Possible unknown owners]
 c/o Clerk, Superior of NJ
 P.O. Box 971
 Trenton, NJ 08625
 ORDINARY MAIL/
 CERTIFIED R.R.R. 7017 0190 0000 9677 6958

STATE OF NEW JERSEY [Possible unpaid NJ Transfer
 c/o Attorney General Inheritance Taxes and/or NJ
 P.O. Box 080 Estate Taxes and/or Escheat
 Trenton, NJ 08625 and/or NJ Corporation Franchise
 ORDINARY MAIL/ or other taxes]
 CERTIFIED R.R.R. 7017 0190 0000 9677 5166 [Judgment#DJ-108096-1998]
 [Judgment#DJ-076996-2012]

PUBLIC SERVICE ELECTRIC AND GAS CO. [Judgment#DJ-115464-1998]
 P.O. Box 570
 Newark, NJ 07101
 ORDINARY MAIL/
 CERTIFIED R.R.R. 7017 0190 0000 9678 0160

LVNV FUNDING LLC [Judgment#J-280553-2007]
 c/o Corporation Service Co. R/A
 Princeton So. Corp. Ctr. #160
 100 Charles Ewing Boulevard
 Ewing, NJ 08628
 ORDINARY MAIL/
 CERTIFIED R.R.R. 7017 0190 0000 9678 1684

LVNV FUNDING LLC [Judgment#J-280553-2007]
 c/o EICHENBAUM & STYLIANOU LLC
 P.O. Box 914
 Paramus, NJ 07653
 ORDINARY MAIL/
 CERTIFIED R.R.R. 7017 0190 0000 9678 1693

WEST COAST VIDEO [Judgment#DJ-258725-2003]
 374 Central Avenue
 Jersey City, NJ 07307
 ORDINARY MAIL/
 CERTIFIED R.R.R. 7017 0190 0000 9678 1709

WEST COAST VIDEO [Judgment#DJ-258725-2003]
 c/o HOFFMAN LAW OFFICES
 713 E. Landis Avenue
 Vineland, NJ 08360
 ORDINARY MAIL/
 CERTIFIED R.R.R. 7017 0190 0000 9678 1716

MEDICAL PRACTICE MANAGEMENT ASSOC [Judgment#DJ-258728-2003]
 1138 E. Chestnut Avenue, Suite 7C
 Vineland, NJ 08360
 ORDINARY MAIL/
 CERTIFIED R.R.R. 7017 0190 0000 9678 1723

MEDICAL PRACTICE MANAGEMENT ASSOC [Judgment#DJ-258728-2003]
 c/o HOFFMAN LAW OFFICES
 713 E. Landis Avenue
 Vineland, NJ 08360
 ORDINARY MAIL/
 CERTIFIED R.R.R. 7017 0190 0000 9678 1730

EXHIBIT E

Schedule No. 46

090323101000

UTF BC: 08225165599

*0903-11002-27-38

LYNETTE JOHNSON
250 Tremont Avenue
East Orange, NJ 07018

NIXIE

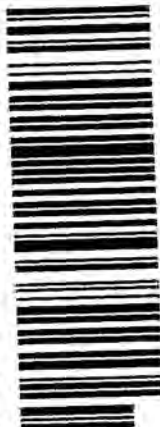
076 DE 1

0011/02/17

RETURN TO SENDER
UNABLE TO FORWARD

GMS LAW
ATTORNEYS
660 NEW ROAD, FIRST FLOOR
NORTHFIELD, NEW JERSEY 08225

7017 0190 0000 9678 1631



02 1P
0001844854 OCT 27 2017
MAILED FROM ZIP CODE 08225



CERTIFIED MAIL

TEFT 9296 0000 D6TD 2102

**U.S. Postal Service™
CERTIFIED MAIL® RECEIPT**
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee	
\$	3.35
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$ 2.75
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$
Postage	
\$.46
Total Postage and Fees	
\$	6.56
Sent To	
LYNETTE JOHNSON	
250 Tremont Avenue	
East Orange, NJ 07018	
City, State, ZIP+4®	

Postmark
Here

UNITED STATES POSTAGE
\$ 000.460
02 1P
0001844854 OCT 27 2017
MAILED FROM ZIP CODE 08225



076 DE 1 0011/02/17

RETURN TO SENDER
UNABLE TO FORWARD

BC: 08225165599 *0403-11002-27-38

VAC

090323101000

46

0903

Schedule No.

Schedule No. 46

09031555

UTF

BC: 0822516889

09031555

*0903-06791-27-48

NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD

NIXIE

076 DE 1

0011/03/17

OWNER/OCCUPANT/TENANT
250 Tremont Avenue
East Orange, NJ 07018

VAC ES

7017 0190 0000 9678 1648



02 1P
\$006.56
0001844854 OCT 27 2017
MAILED FROM ZIP CODE 08225

GMS LAW
ATTORNEYS
660 NEW ROAD, FIRST FLOOR
NORTHFIELD, NEW JERSEY 08225

CERTIFIED MAIL

UNITED STATES POSTAGE
\$000.46
02 1P
0001844854 OCT 27 2017
MAILED FROM ZIP CODE 08225



OWNER/OCCUPANT/TENANT
250 Tremont Avenue
East Orange, NJ 07018

NIXIE

076 DE 1 0011/03/17

RETURN TO SENDER
VACANT
UNABLE TO FORWARD

BC: 0822516889

VAC

09031555
070181010

Schedule No. 46

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
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For delivery information, visit our website at www.usps.com®

OFFICIAL USE

Certified Mail Fee \$ 3.35	
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$ 2.75
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$
Postage \$.46	
Total Postage and Fees \$ 6.56	
Sent To OWNER/OCCUPANT/TENANT 250 Tremont Avenue East Orange, NJ 07018	

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

EXHIBIT F

EITH A. BONCHI, ESQUIRE -KAB032321983
 GOLDENBERG, MACKLER, SAYEGH, MINTZ,
 PFEFFER, BONCHI & GILL
 A Professional Corporation
 660 New Road, Suite 1-A
 Northfield, NJ 08225
 (609) 646-0222

<u>Attorneys for Plaintiff</u>	<u>SUPERIOR</u>	<u>COURT OF NEW JERSEY</u>
CITY OF EAST ORANGE, A Municipal)	ESSEX COUNTY
Corporation of New Jersey)	CHANCERY DIVISION
)	
Plaintiff(s))	Docket No.F-020807-17
)	
vs.)	
Block: 21 Lot: 12 (#1))	CIVIL ACTION
ASSESSED TO: 135 STEUBEN, LLC)	
135 Steuben Street)	CERTIFICATION OF MAILING
-----)	FILED FINAL JUDGMENT AND
Block: 52 Lot: 24.01 (#2))	FILED REQUEST FOR ENTRY
ASSESSED TO: JOHNSON, Marion)	OF DEFAULT
97 No. 14 th Street)	
-----)	
Block: 53 Lot: 13 (#3))	
ASSESSED TO: ABRAM, William N. & Alvurn h/w))	
77 No. 15 th Street)	
-----)	
Block: 53 Lot: 14 (#4))	
ASSESSED TO: ABRAM, William)	
81 No. 15 th Street)	
-----)	
Block: 55 Lot: 35 (#5))	
ASSESSED TO: FEDERAL NATIONAL MORTGAGE)	
ASSOCIATION)	
32 No. 18 th Street)	
-----)	
Block: 64 Lot: 52.02 (#6))	
ASSESSED TO: 113 NORTH 15 TH ASSOCIATION, LLC))	
[per TSC]; 113 NORTH 15 TH ASSOC., LLC [per)	
Deed])	
113 No. 15 th Street)	
-----)	
Block: 65 Lot: 7.01 (#7))	
ASSESSED TO: SHARPER, Barbara & Raquel)	
125 No. 14 th Street)	
-----)	
Block: 65 Lot: 16 (#8))	
ASSESSED TO: BRICK CITY BUILDERS, LLC)	
173 No. 14 th Street)	
-----)	
Block: 65 Lot: 36 (#9))	
ASSESSED TO: LOCKHART, V. Dicks & DICKS,)	
Donielle [per TSC]; LOCKHART, Vernita)	
Dicks & DICKS, Donielle [per Deed])	
126 No. 15 th Street)	
-----)	
<u>FILE NO. 57012-50</u>		

Block: 65 Lot: 38 (#10))
 ASSESSED TO: AUSTIN, W. & Helen & HOLLAND,)
 C. ADM [per TSC]: AUSTIN, Walter W. &)
 Helen h/w [per deed] [Both deceased])
 HOLLAND, Carol, Adm. Estate of Helen)
 Austin; HOLLAND, Carol, AUSTIN, Harold,)
 AUSTIN, Derek & AUSTIN, Deborah,)
 [Intestate heirs of Helen Austin])
 118 No. 15th Street)

-----)
 Block: 70 Lot: 10 (#11))
 ASSESSED TO: VALLE, Jose)
 163 No. 18th Street)

-----)
 REMOVED (#12))

-----)
 Block: 121 Lot: 31 (#13))
 ASSESSED TO: LIGHTFOOT, Jean G., et al)
 [per TSC]; LIGHTFOOT, Jean G., LANGSTON,)
 Marie & PARKER, Madison [per Deed] [All)
 deceased]; LIGHTFOOT, Erica L. as heir &)
 Administratrix/Estate of Jean G. Lightfoot)
 PARKER, Brian A. [per deed-as to Madison)
 Parker interest]; & LANGSTON, Bruce as)
 Beneficiary & Executor/Estate of Marie)
 Langston])
 507 No. Grove Street)

-----)
 Block: 140 Lot: 1.01 (#14))
 ASSESSED TO: INISS, Rudolph C. [per TSC];)
 INNISS, Rudolph C. [per Deed] [deceased];)
 INNISS, Rudolph Jr. [Intestate Heir &)
 Administrator/Estate of Rudolph C. Inniss])
 220 No. 19th Street)

-----)
 Block: 161 Lot: 35 (#15))
 ASSESSED TO: MAYFIELD, Willis D. & Barbara,)
 h/w [per TSC] [Both deceased]; MAYFIELD,)
 Willis D. & Barbara h&w and TUCKER, Clara)
 [per Deed]; WAXMAN, Howard I. Administra-)
 tor/Estate of Barbara C. Mayfield)
 38 Vernon Terrace)

-----)
 Block: 173 Lot: 30 (#16))
 ASSESSED TO: TACTICAL INVESTMENT GROUP,)
 LLC [per TSC]; AGARD INVESTMENTS INC.)
 [per Deed-in-Lieu of Foreclosure])
 149 William street)

-----)
 Block: 216 Lot: 30 (#17))
 ASSESSED TO: ELLIS, Delano)
 5A Whittlesey Avenue)

Block: 255 Lot: 21 (#18))
 ASSESSED TO: BROWN, Stanley & Betty R.)
 [brother & sister; BROWN, Betty R. a/k/a)
 VANCLIEF, Betty R. [Died 10/7/2009])
 96 No. Munn Avenue)
 -----)
 REDEEMED (#19))
 -----)
 REDEEMED (#20))
 -----)
 REMOVED (#21))
 -----)
 REDEEMED (#22))
 -----)
 REMOVED (#23))
 -----)
 REMOVED (#24))
 -----)
 REDEEMED (#25))
 -----)
 REMOVED (#26))
 -----)
 REDEEMED (#27))
 -----)
 REDEEMED (#28))
 -----)
 Block: 481 Lot: 25 (#29))
 ASSESSED TO: KAMEL PROPERTIES, LLC)
 322 Amherst Street)
 -----)
 REDEEMED (#30))
 -----)
 SEVERED (#31))
 -----)
 REDEEMED (#32))
 -----)
 Block: 523 Lot: 26.13 (#33))
 ASSESSED TO: AMHERST STREET TOWNHOMES)
 HOMEOWNERS)
 Amherst Street Lot)
 -----)
 Block: 543 Lot: 22 (#34))
 ASSESSED TO: HERITAGE HOLDING, LLC &)
 McCLENDON, E.[Ezra] [per TSC]; HERITAGE)
 HOLDING, LIMITED LIABILITY COMPANY [per)
 Deed])
 72 Lincoln Street)
 -----)
 Block: 552.01 Lot: 12 (#35))
 ASSESSED TO: CARLA REAL ESTATE)
 DEVELOPERS, LLC)
 86 Prospect Street)
 -----)

REDEEMED (#36))
 -----)
 REDEEMED (#37))
 -----)
 Block: 650 Lot: 14 (#38))
 ASSESSED TO: PINNER, Joseph Jr., Admin [per
 TSC]; HAGAN, Roland III [per Deed];)
 PINNER, Carol [u/will of Roland Hagan III])
 PINNER, Joseph Jr. [Heir/Administrator-)
 Estate of Carol Pinner; PINNER, Joseph S.}
 Heir-Estate of Carol Pinner)
 160 Glenwood Avenue)
 -----)
 Block: 720 Lot: 34 (#39))
 ASSESSED TO: RAMADAN, Qamar)
 113 Sanford Street)
 -----)
 SEVERED (#40))
 -----)
 Block: 741 Lot: 8 (#41))
 ASSESSED TO: McCOY, Vernell [per TSC];)
 WHITE, Agnes [per Deed]; McCOY, Vernell)
 Executrix/Estate of Agnes White; McCOY,)
 Vernell, COOPER, Novella, HINTON, Keith,)
 HINTON, Bruce, WHITE, Ronald, WHITE,)
 Vernell, WHITE, Peter, WHITE, Russell, &)
 WHITE, Donald [Residuary beneficiaries u/w)
 Agnes White)
 25 Telford Street)
 -----)
 Block: 742 Lot: 15 (#42))
 ASSESSED TO: GUILLUAME, Villeret)
 295 Elmwood Avenue)
 -----)
 Block: 744 Lot: 4 (#43))
 ASSESSED TO: ST-VIL, Lucia A. & Jean)
 Wilner, h/w)
 335 Halsted Street)
 -----)
 REMOVED (#44))
 -----)
 Block: 761 Lot: 6.02 (#45))
 ASSESSED TO: DASILVA, Luiz C. & MACIEL,)
 Ronaldo J.)
 36 Lindsley Place Lot)
 -----)
 Block: 773 Lot: 43 (#46))
 ASSESSED TO: JOHNSON, Lynette)
 250 Tremont Avenue)
 -----)


Block: 781 Lot: 25 (#47))
 ASSESSED TO: COLEMAN, Felicia R.)
 283 Sanford Street)
 -----)
 Block: 820 Lot: 52 (#48))
 ASSESSED TO: ROBINSON, John & BARNETT,)
 Frederika [per TSC]; ROBINSON, John F. &)
 ROBINSON-BARNETT, Frederika [per Deed])
 27-29 Schuyler Terrace)
 -----)
 REDEEMED (#49))
 -----)
 REMOVED (#50))
 -----)
 REMOVED (#51))
 -----)
 Block: 901 Lot: 11 (#52))
 ASSESSED TO: REGAN, Ronald [per TSC];)
 REGAN, Ronald & Teresa h/w [per Deed])
 199 No. Park Street)
 -----)
 REMOVED (#53))
 -----)
 -----)
 Defendant(s))

MEGAN L. GONZALEZ, being of full age, hereby certifies:

1. I am a legal assistant employed by the law firm of Goldenberg, Mackler, Sayegh, Mintz, Pfeffer, Bonchi & Gill, A Professional Corporation, Attorneys for the plaintiff in the above entitled matter.

2. I did on February 13, 2018 mail in the U.S. Post Office, at Northfield, New Jersey, a sealed envelope with postage prepaid thereon, by regular mail, addressed to each of the parties set forth on the attached schedules, which contained a copy of the filed request for entry of default and filed final judgment in the above matter.

3. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.


 MEGAN L. GONZALEZ

Dated: February 13, 2018

RONALDO J. MACIEL c/o DASILVA
8 Prospect Place
Kearny, NJ 07032

RONALDO J. MACIEL
43 Ivy Street
Kearny, NJ 07032

RONALDO J. MACIEL
c/o Clerk, Superior Court of NJ
P.O. Box 971
Trenton, NJ 08625

ISAAC MORADI
520 Elm Street
Kearny, NJ 07032

ISAAC MORADI
28 Cunningham Drive
West Orange, NJ 07052

LYNETTE JOHNSON
c/o Clerk, Superior of NJ
P.O. Box 971
Trenton, NJ 08625

LYNETTE JOHNSON
c/o ALLEN TUCKER
3440 S. Ocean Blvd. Apt. 502 S
Palm Beach, FL 33480

LYNETTE JOHNSON
c/o STACY SANTOLA, ESQUIRE
18 Tony Galento Plaza
Orange, NJ 07050

LVNV FUNDING LLC
c/o Corporation Service Co. R/A
Princeton So. Corp. Ctr. #160
100 Charles Ewing Boulevard
Ewing, NJ 08628

LVNV FUNDING LLC
c/o EICHENBAUM & STYLIANOU LLC
P.O. Box 914
Paramus, NJ 07653

WEST COAST VIDEO
c/o HOFFMAN LAW OFFICES
713 E. Landis Avenue
Vineland, NJ 08360

MEDICAL PRACTICE MANAGEMENT ASSOC
1138 E. Chestnut Avenue, Suite 7C
Vineland, NJ 08360

MEDICAL PRACTICE MANAGEMENT ASSOC
c/o HOFFMAN LAW OFFICES
713 E. Landis Avenue
Vineland, NJ 08360

FELICIA R. COLEMAN
809 N. 6th Street
Philadelphia, PA 19123

MR. FELICIA R. COLEMAN
809 N. 6th Street
Philadelphia, PA 19123

JOHN F. ROBINSON
38 W. 34TH Street
Bayonne, NJ 07002

MRS. JOHN F. ROBINSON
38 W. 34TH Street
Bayonne, NJ 07002