

EXHIBIT A

AFFIDAVIT OF PAULA NEWCOMB

I, Paula Newcomb, having been duly sworn, am prepared to testify that the following statements are true to the best of my knowledge, information and belief:

1. I am a citizen of the United States and the State of Michigan.
2. I own and reside in my home in the County of Wayne, State of Michigan with the common address of 30706 Hennepin, Garden City, Michigan, 48135 ("property").
3. I acquired ownership in the home pursuant to a deed on January 31, 2011, recorded in Liber 51526, Page 1317, Wayne County Records. The home has been owned by my family and has remained in my family's possession since the 1950's.
4. I am also the former owner of 32957 Florence, Garden City, Michigan 48135. I transferred my interest in the Florence residence to my daughter Andrea Rowe. A deed has not yet been recorded in the Wayne County Register of Deeds.
5. It appears that Garden City applied an unexplained "assessment" to my summer tax bill for years 2011-2015 in the following amounts \$110.52 (2011), \$1,201.28 (2012), \$3,248.75 (2013), \$1,079.17 (2014), and \$1,839.18 (2015) for a total of \$7,478.90 in "special assessments" that I did not owe on the property.
6. A Wayne County Treasurer document in my possession reflects the fact that I paid all taxes up to and including the 2011 delinquent taxes.
7. The Wayne County FOIA documents for my property do not contain any pictures of certified mail envelopes nor receipts of any documents delivered to my property or myself. The mail log reflects the fact that the certified mail the Treasurer claims he sent me was not delivered nor received. I have reviewed the USPS report on all three certified mailings that the Treasurer claims were sent and the three appear to have been sent

somewhere on December 19, 2014 and were not delivered as of January 13, 2015. Currently, all three mailings show that they are currently in transit to the destination, as of January 19, 2015. The PA 123 Notifications Document reflects the fact that no first class mail was sent to me or my property for the 2012 taxes. The picture of the property produced by the County was not taken, as suggested by Nancy Jackson, on November 7, 2014 at 4:27pm.

8. My base annual taxes, as assessed by Garden City in 2012, was \$1,702.76.
9. I did not receive any mail, nor did I receive a personal visit regarding delinquent 2012 taxes. No one else in or at my household received any notice either. There was no notice or any other documentation attached to my property in 2014 or 2015. Neither I nor anyone else at my property received notice that my property was going to be sold to Garden City or anyone else in 2015.
10. I additionally have never received any mail regarding delinquent 2012 taxes on the home located at 32957 Florence Street, Garden City, Michigan 48135.
11. On January 22, 2015, I entered into a payment agreement with Wayne County for both the property and the Florence home. At this time I paid \$1,179 towards the 2012 taxes.
12. After making a payment on January 22, 2015, I was told by the staff of the Wayne County Treasurer that, like prior years, that my house would not be sold this year and that I had until the end of December 2015 to pay my delinquent 2012 taxes. I was also told that regardless of whether I was in a payment plan I could come back in August and pay off any taxes owing at that time.
13. I returned to the Wayne County Treasurer to pay my taxes due on August 10, 2015, but was denied the opportunity.

14. I was struggling financially temporarily due to a job loss, and was recently re-employed, but have been doing everything I could to save my home for me and my family.
15. If I had known that I would not be given until the time specified by the Wayne County Treasurer to pay my delinquency, or that it was possible for the City to purchase my property before the tax auction, I would have paid any amounts I owed in full, by borrowing against the equity in my mortgage-free home, or by borrowing from a family or friend. As a last resort, I could have and would have been able to sell the property, and keep the balance of the equity.
16. My credit has been damaged by this illegal foreclosure. I am emotionally distressed, and I want to keep my home. I am ready to pay any amounts I owe. I have been illegally denied equal protection and due process of law guaranteed by the laws and constitutions of the State of Michigan and the United States of America.

Further affiant sayeth not.

Dated: December 22, 2015

Subscribed and Sworn to before me
on this 22nd day of December 2015.



Notary Public, Wayne County, State of Michigan



PAULA NEWCOMB

ROCHELLE BERRY
Notary Public, State of Michigan
County of Wayne
My Commission Expires 10-03-2021
Acting in the County of Wayne

AFFIDAVIT OF ZAINAH HAMMOUD

I, Zainah Hammoud, having been duly sworn, am prepared to testify that the following statements are true to the best of my knowledge, information and belief:

1. I am a citizen of the United States and the State of Michigan.
2. I own and reside in my home in the County of Wayne, State of Michigan with the common address of 6944 Theisen St. Dearborn, Michigan, 48126("property").
3. I acquired ownership in the home pursuant to a deed on 05/15/2012, recorded in Liber 49834, Page 0315, Wayne County Records.
4. I filed for and was otherwise entitled to a Principal Residence Exemption ("PRE") for the purpose of property tax assessments in 2012-2015.
5. The taxing unit, City of Dearborn conducted the prior sale and closing in 2011, and knew that the property was entitled to a principal residence exemption, yet failed to prepare grant an exemption.
6. I only learned today that the PRE was apparently revoked or denied, without notice, for tax years 2011-2015. I received no notice of the denial. I intend on appealing this revocation/denial immediately.
7. The "true cash value" used to calculate the taxable value of my property for 2015 was \$87,018. Thus, the illegal denial of my PRE resulted in an illegal assessment of approximately \$1,566.32 plus interest and fees for each year during the 2011-2015 tax years.
8. Additionally, it appears that Dearborn applied an unexplained "assessment" to my summer tax bill for years 2013-2015 in the following amounts 3227.82 (2013), 1611.36 (2014), and 1,450.40 (2015), for a total of \$6,289.58 in "special assessments" that I did not owe.

9. I received documentation showing that I had until December 2015 to pay my delinquent 2012 taxes in full.
10. A Wayne County Treasurer document in my possession and produced in November, 2015 falsely reflects that only 2 payments, totaling \$2,063 were made towards my delinquent 2012 taxes. In fact, I have 3 receipts, Wayne County Treasurer documents in my possessions refutes that falsity and reflect the fact that the following amounts were paid: \$3,647.10 on 09/19/2013, \$3,500 on April 14, 2014, and \$488 on 01/08/2015, for a total of \$7,635.10 that should have definitely been applied to and more than suffice to pay off the 2012 delinquent taxes and any related costs or fees. I also arranged for another individual to deliver a \$3,000 tax payment for me in January 2015 and cannot locate a receipt for that payment.
11. On January 8, 2015, under the duress of a threat of tax foreclosure, I entered into a payment agreement for delinquent 2012 taxes, that were not actually owed, and made the above-referenced \$488 payment towards the 2012 taxes.
12. The Wayne County FOIA documents for my property do not contain any pictures of certified mail envelopes nor receipts. The mail log reflects the fact that the Certified mail the Treasurer claims he sent me was neither sent to me nor received. I have reviewed the USPS report on both certified mailings that the Treasurer claims were sent and all appear to have been sent somewhere on November 20th or 21st, 2014 and reported as "accepted" in Detroit on November 21st, 2015, but never delivered. Conversely, the certified mail the Treasurer purportedly sent to Portfolio Recovery, who holds no interest in the property, was delivered on December to an address in Troy, MI and a signature card from USPS appears in the file. The PA 123 Notifications document reflects the fact that no first class

mail was sent to me or my property for the 2012 taxes. The picture of the property produced by the County was not taken, as suggested by Richard Kosmack, on October 27, 2014 at 4:53pm.

13. My base annual taxes, as assessed by Dearborn in 2012, was \$3,067.66.
14. Altogether, County records reflect the fact that we paid at least \$7,635.10 towards the 2012 taxes, which is 248% of my base 2012 taxes.
15. I did not receive any mail, nor did I receive a personal visit regarding delinquent 2012 taxes. No one else in or at my household received any notice either. There was no notice or any other documentation attached to my property in 2014 or 2015. Neither I nor anyone else at my property received notice that my property was going to be sold to Dearborn or anyone else in 2015.
16. After making a payment on 01/08/2015, we were told by the staff of the Wayne County Treasurer that my house would not be sold this year and that I had until the end of December 2015 to pay my delinquent 2012 taxes, which I actually did not even owe.
17. I was struggling financially temporarily, after discovering that my husband and brother in law failed to pay property taxes as promised, but have been doing everything I could to save my home for me and my family.
18. If I had known that I would not be given until the end of the year to pay my falsely-alleged delinquency, or that it was possible for the City to purchase my property before the tax auction, I would have paid any amounts I owed in full, by borrowing against the equity in my mortgage-free home, or by borrowing from a family or friend. As a last resort, I could have and would have been able to sell the property, and keep the balance of the equity.

19. Upon receiving a notice to quit, we searched for answers, and we were told by Wayne County and the City of Dearborn that it was too late. They refused to even offer the most basic information.

20. Despite the approval of other property owners' nearly identical requests to repurchase homes from the City of Dearborn, the City denied my request, despite my meeting and exceeding every criteria that was established during the consideration of the requests to repurchase. There was no rational basis for this discrimination.

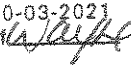
21. My credit has been damaged by this illegal foreclosure. I am emotionally distressed, and I want to keep my home. I am ready to pay any amounts I owe. I have been illegally denied equal protection and due process of law guaranteed by the laws and constitutions of the State of Michigan and the United States of America.

Further affiant sayeth not.

Dated: December 23, 2015


ZAINAH HAMMOUD

Subscribed and Sworn to before me
on this 23rd day of December 2015.

ROCHELLE BERRY
Notary Public, State of Michigan
County of Wayne
My Commission Expires 10-03-2021
Acting in the County of 


Notary Public, Wayne County, State of Michigan

AFFIDAVIT OF GARY ZELONY

I, Gary Zelony, having been duly sworn, am prepared to testify that the following statements are true to the best of my knowledge, information and belief:

1. I am a citizen of the United States and the State of Michigan.
2. I own and reside in my home in the County of Wayne, State of Michigan with the common address of 30431 Marquette Street, Garden City, Michigan, 48135-1343 ("property").
3. I acquired ownership in the home in 1983 with my former spouse. The home was awarded to me as part of a settlement agreement. I received ownership to the property pursuant to a quit claim deed recorded on November 27, 1990 recorded in Liber 24917, Page 0037, Wayne County Records.
4. I have at all relevant times been entitled to a Principal Residence Exemption ("PRE") for the purpose of property tax assessments throughout my period of ownership of the property. I have applied for such an exemption previously and believe I have been granted an exemption. I am entitled to a PRE for all tax years since 2012.
5. I do not know why my PRE application was denied, but at all relevant times the property has been my primary residence. I intend on appealing this revocation/denial immediately.
6. The "true cash value" used to calculate the taxable value of my property for 2015 was \$77,814. Thus, the illegal revocation of my PRE resulted in an illegal assessment of approximately \$700.42 plus interest and fees for each year during at least the 2011-2015 tax years.
7. Additionally, it appears that Garden City applied an unexplained "assessment" to my summer tax bill for years 2011-2015 in the following amounts \$605.83 (2011), \$330.72 (2012), \$693.25 (2013), \$704.34 (2014), and \$825.91 (2015), for a total of \$3,160.05 in "special assessments" that I did not owe over the past five tax years.
8. I received documentation showing that I had until December 2015 to pay my delinquent 2012 taxes in full. I also received a payment schedule.
9. A Wayne County Treasurer document in my possession and dated 03/30/2015 reflects a balance for 2012 taxes on that date of \$4,119.21.

10. On 03/30/2015, I entered into a payment agreement with the County and paid \$1,072 towards the 2012 taxes.
11. The Wayne County FOIA documents for my property do not contain any pictures of certified mail envelopes nor receipts. The mail log reflects the fact that the Certified mail the Treasurer claims he sent me was not received. I have reviewed the USPS report on all 10 certified mailings that the Treasurer claims were sent and all those sent to myself, the owner of record of the property, appear to have been sent somewhere on December 19, 2014 and are reported as still in transit. The PA 123 Notifications Document reflects the fact that no first class mail was sent to me or my property for the 2012 taxes.
12. My base annual taxes, as assessed by Garden City in 2012, was \$3,252.77, without my PRE.
13. I made a second payment of \$1,072.00 toward my 2012 taxes in 2015. However, this payment has never been reflected on any County records. Altogether, County records reflect the fact that we paid at least \$2,144.00 towards the 2012 taxes, which is 65.9% of my base 2012 taxes.
14. I did not receive any mail, nor did I receive a personal visit regarding delinquent 2012 taxes. No one else in or at my household received any notice either. There was no notice attached to my property in 2014 or 2015. Neither I nor anyone else at my property received notice that my property was going to be sold to Garden City or anyone else in 2015.
15. After making a payment on March 30, 2015, I was told by the staff of the Wayne County Treasurer that, like prior years, that my house would not be sold this year and that I had until the end of December 2015 to pay my delinquent 2012 taxes.
16. I have suffered greatly financially since the last recession began in 2008, due to losing approximately 65 percent of my chiropractor practice.
17. If I had known that I would not be given until the end of the year to pay my delinquency, or that it was possible for the City to purchase my property before the tax auction, I would have paid any amounts I owed in full, by borrowing against the equity in my mortgage-free home, or by borrowing from a family or friend. As a last resort, I could have and would have been able to sell the property, and keep the balance of the equity.

18. Upon receiving a notice to quit, I searched for answers, and was told by Wayne County and Garden City that it was too late. They refused to even offer the most basic information.

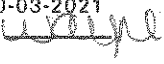
19. My credit has been damaged by this illegal foreclosure. I am emotionally distressed, and I want to keep my home. I am ready to pay any amounts I owe, but I believe I have been illegally denied equal protection and due process of the law that are guaranteed by the laws and constitutions of the State of Michigan, and the United States.

Further affiant sayeth not.

Dated: December 22, 2015


GARY ZELONY

Subscribed and Sworn to before me
on this 22nd day of December 2015.

ROCHELLE BERRY
Notary Public, State of Michigan
County of Wayne
My Commission Expires 10-03-2021
Acting in the County of 


Notary Public, Wayne County, State of Michigan

AFFIDAVIT OF HENRY KOPPOE

I, Henry Koppoe, having been duly sworn, am prepared to testify that the following statements are true to the best of my knowledge, information and belief:

1. I am a citizen of the United States and the State of Michigan.
2. I own and reside in my home in the County of Wayne, State of Michigan with the common address of 1062 Stewart Avenue, Lincoln Park, Michigan, 48146-3622 ("property").
3. I acquired ownership in the home pursuant to a deed on April 23, 2010, recorded in Liber 48553, Page 1048, Wayne County Records.
4. I filed for and was otherwise entitled to a Principal Residence Exemption ("PRE") for the purpose of property tax assessments in 2010. However, a PRE was never applied to the property. I intend on appealing this revocation/denial immediately.
5. The "true cash value" used to calculate the taxable value of my property for 2015 was \$53,000. Thus, the illegal denial of my PRE resulted in an illegal assessment of approximately \$477.00 plus interest and fees for each year during the 2011-2015 tax years.
6. Additionally, it appears that the City of Lincoln Park applied an unexplained "assessment" to my tax bills for years 2012-2015 in the following amounts \$267.04 (2012), \$38.35 (2013), \$38.42 (2014), and \$421.11 (2015) for a total of \$764.92 in "special assessments" that I did not owe.

8. I have not yet received nor examined the FOIA documents for my foreclosure file.

However, neither I nor anyone at my household was sent or left any notice of the 2015 tax foreclosure and sale by which the property was deeded to the City of Wayne.

9. I was struggling financially temporarily, but have been doing everything I could to save the home.

10. If I had known that I would not be given until the tax auction to pay my delinquency, or that it was possible for the City to purchase my property before the tax auction, I would have paid any amounts I owed in full, by borrowing against the equity in my mortgage-free home, or by borrowing from a family or friend. As a last resort, I could have and would have been able to sell the property, and keep the balance of the equity.

11. I attempted to pay any amounts that were due and was told by Wayne County and the City of Lincoln Park that it was too late. They refused to even offer the most basic information.

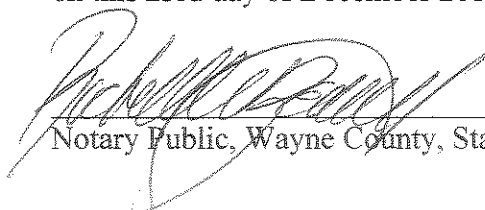
12. My credit has been damaged by this illegal foreclosure. I am emotionally distressed, and I want to keep my home. I am ready to pay any amounts I owe. I have been illegally denied equal protection and due process of law guaranteed by the laws and constitutions of the State of Michigan and the United States of America.

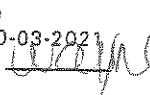
Further affiant sayeth not.

Dated: December 23, 2015


HENRY KOPPE

Subscribed and Sworn to before me
on this 23rd day of December 2015.


Notary Public, Wayne County, State of Michigan

ROCHELLE BERRY
Notary Public, State of Michigan
County of Wayne
My Commission Expires 10-03-2021
Acting in the County of 

AFFIDAVIT OF CHERYL FOSTER

I, Cheryl Foster, having been duly sworn, am prepared to testify that the following statements are true to the best of my knowledge, information and belief:

1. I am a citizen of the United States and the State of Michigan.
2. I own and reside in my home in the County of Wayne, State of Michigan with the common address of 30500 Barton, Garden City, MI , Michigan, 48135 ("property").
3. I acquired ownership in the home pursuant to a deed on 11/23/2005, recorded in Liber 44089, Page 2556, Wayne County Records.
4. I filed for and was otherwise entitled to a Principal Residence Exemption ("PRE") for the purpose of property tax assessments in 2005.
5. It appears that Garden City applied an unexplained "assessment" to my summer tax bill for years 2012-2015 in the following amounts 1821.14 (2012), 1588.68 (2013), and 1410.98 (2014), and 1276.13 (2015) for a total of \$6,096.93 in "special assessments" that I did not owe. Individual males who appeared to be Garden City employees cut off my DTE power lines, and recently left notices claiming a "high water consumption or radio read repair notice", despite my payment of utility bills.
6. A Wayne County Treasurer document in my possession reflects the fact that I paid all taxes up to and including the 2011 delinquent taxes, including a payment of \$500 on January 9, 2015.
7. On the same day, January 9, 2015, I entered into a payment agreement for delinquent 2012 taxes and paid \$500 towards the 2012 taxes.
8. I received documentation showing that I had until December 2015 to pay my delinquent 2012 taxes in full. I also received a payment schedule. On the same day, a Wayne County Treasurer staff member took my application, set the payment amounts and told me that I

had until the end of the year to pay the balance. I returned to the Treasurer's office on September 30, 2015 to pay the balance of my delinquent 2012 taxes and was told that it was too late because my property had been sold to Garden City. I sent the Treasurer an email and received a response letter on October 6, 2015 reaffirming this outrageous fact.

9. The Wayne County FOIA documents for my property do not contain any pictures of certified mail envelopes nor receipts. The mail log reflects the fact that the certified mail the Treasurer claims he sent me was not delivered nor received. I have reviewed the USPS report on both certified mailings that the Treasurer claims were sent and both appear to have been sent somewhere on November 21, 2014 and reported as undeliverable on November 26, 2014. The mail sent to Deutsche Bank, who has no interest in the property, appears to have been addressed to and delivered to a location in Jersey City, NJ, and a copy of a signature card was included. The PA 123 Notifications Document reflects the fact that no first class mail was sent to me or my property for the 2012 taxes. The picture of the property produced by the County was not taken, as suggested by Nancy Jackson, on November 7, 2014 at 4:19pm.
10. My base annual taxes, as assessed by Garden City in 2012, was \$2,972.44.
11. I did not receive any mail, nor did I receive a personal visit regarding delinquent 2012 taxes. No one else in or at my household received any notice either. There was no notice or any other documentation attached to my property in 2014 or 2015. Neither I nor anyone else at my property received notice that my property was going to be sold to Garden City or anyone else in 2015.

12. After making a payment on 01/09/2015, I was told by the staff of the Wayne County Treasurer that my house would not be sold this year and that I had until the end of December 2015 to pay my delinquent 2012 taxes.
13. I was struggling financially temporarily due to a job loss, and was recently re-employed, but have been doing everything I could to save my home for me and my family.
14. If I had known that I would not be given until the end of the year to pay my delinquency, or that it was possible for the City to purchase my property before the tax auction, I would have paid any amounts I owed in full, by borrowing against the equity in my mortgage-free home, or by borrowing from a family or friend. As a last resort, I could have and would have been able to sell the property, and keep the balance of the equity.
15. My credit has been damaged by this illegal foreclosure. I am emotionally distressed, and I want to keep my home. I am ready to pay any amounts I owe. I have been illegally denied equal protection and due process of law guaranteed by the laws and constitutions of the State of Michigan and the United States of America.

Further affiant sayeth not.

Dated: December 23, 2015


CHERYL FOSTER

Subscribed and Sworn to before me
on this 23rd day of December 2015.

ROCHELLE BERRY
Notary Public, State of Michigan
County of Wayne
My Commission Expires 10-03-2021
Acting in the County of Wayne


Notary Public, Wayne County, State of Michigan

AFFIDAVIT OF ROBERT RADFORD

I, Robert Radford, having been duly sworn, am prepared to testify that the following statements are true to the best of my knowledge, information and belief:

1. I am a citizen of the United States and the State of Michigan.
2. I own and reside in my home in the County of Wayne, State of Michigan with the common address of 29724 Marquette, Garden City, Michigan 48135 ("property").
3. I acquired ownership in the home from my brother pursuant to a quit claim deed dated March 24, 2004, which is recorded with the Wayne County Register of Deeds, Liber 41630, Page 0130. The home has been owned by my family since the 1950's and was my home as a child.
4. I was granted and was otherwise entitled to a Principal Residence Exemption ("PRE") for the purpose of property tax assessments throughout my period of ownership of the property.
5. The "true cash value" used to calculate the taxable value of my property for 2015 was \$35,856.00
6. It appears that the City of Garden City applied an unexplained "assessments" to my tax bills for years 2011-2015 in the following amounts \$106.00 (2011), \$142.87 (2012), \$141.79 (2013), \$585.05 (2014), and \$106.00 (2015), for a total of \$1,081.71 in "special assessments" that I did not owe over the past five tax years.
7. My base annual taxes, as assessed by Garden City in 2012, was \$1,683.18.
8. A Wayne County Treasurer document in my possession reflects a balance for 2012 taxes of \$1,522.25, reflecting payments of at least \$430.84 made toward that years taxes.
9. The Wayne County FOIA documents for my property do not contain any pictures of certified mail envelopes nor receipts. The mail log reflects the fact that the Certified mail the Treasurer claims he sent me was not received. I have reviewed the USPS report on all three certified mailings that the Treasurer claims were sent. The three mailings allegedly sent to myself were never delivered and, as of December 30, 2014, are displayed as currently in transit to the destination. The PA 123 Notifications Document reflects the fact that no first class mail was sent to me or my property for the 2012 taxes. The picture of the property produced by the County was not taken, as suggested by Karen Frabotta, on November 10, 2014 at 11:27 a.m.

10. I did not receive any mail, nor did I receive a personal visit regarding delinquent 2012 taxes. No one else in or at my household received any notice either. There was no notice attached to my property in 2014 or 2015. Neither I nor anyone else at my property received notice that my property was going to be sold to the City of Garden City or anyone else in 2015.
11. After making a payment on my 2012 taxes, I was told by the staff of the Wayne County Treasurer that my house would not be until the auction and to come back in August 2015 to pay my delinquent 2012 taxes.
12. If I had known that I would not be given until this time to pay my delinquency, or that it was possible for the City to purchase my property before the tax auction, I would have paid any amounts I owed in full, by borrowing against the equity in my mortgage-free home, or by borrowing from a family or friend. As a last resort, I could have and would have been able to sell the property, and keep the balance of the equity.
13. Upon receiving a notice to quit, I searched for answers, and was told by Wayne County and Garden City that it was too late. They refused to even offer the most basic information and dismissed me when I brought this to their attention during public comment at city council meetings.
14. I am permanently disabled and live on very limited income. I have even lacked the income to pay for basic utilities and although I receive food stamps, these have been cut to only \$16 per month.
15. My credit has been damaged by this illegal foreclosure. I am emotionally distressed, and I want to keep my home. I am ready to pay any amounts I owe, but I believe I have been illegally denied equal protection and due process of the law that are guaranteed by the laws and constitutions of the State of Michigan, and the United States.

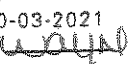
Further affiant sayeth not.

Dated: December 22, 2015


ROBERT RADFORD

Subscribed and Sworn to before me
on this 22nd day of December 2015.


Notary Public, Wayne County, State of Michigan

ROCHELLE BERRY
Notary Public, State of Michigan
County of Wayne
My Commission Expires 10-03-2021
Acting in the County of 

AFFIDAVIT OF ELEANOR EWALD

I, Eleanor Ewald, having been duly sworn, am prepared to testify that the following statements are true to the best of my knowledge, information and belief:

1. I am a citizen of the United States and the State of Michigan.
2. I own and reside in my home in the County of Wayne, State of Michigan with the common address of 6110 Harrison Street, Garden City, Michigan, 48135-2556 ("property").
3. I acquired ownership in the home pursuant to the order of the probate judge, and received title by a deed on 01/16/2014 recorded in Liber 51263, Page 0998, Wayne County Records.
4. I was granted and was otherwise entitled to a Principal Residence Exemption ("PRE") for the purpose of property tax assessments in 2011.
5. I only learned today that my PRE was apparently revoked or denied, without notice, for tax years 2013-2015. This discovery is further supported by a document in my possession, dated February 4, 2015 which states indicates a homestead denial on 11/11/2013 for years 2011 and 2012. I received no notice of the denial. I intend on appealing this revocation/denial immediately.
6. The "true cash value" used to calculate the taxable value of my property for 2015 was \$48,200. Thus, the illegal denial of my PRE resulted in an illegal assessment of approximately \$867.60 plus interest and fees for each year during the 2013-2015 tax years.
7. Additionally, it appears that Garden City applied an unexplained "assessment" to my summer tax bill for years 2011-2015 in the following amounts 1062.99 (2011), 1636.28

(2012), 1788.64 (2013), 1870.00 (2014), and 1646.58 (2015), for a total of \$8,004.49 in “special assessments” that I did not owe.

8. On February 4th, 2014 I entered into a payment agreement for delinquent 2011 taxes.
9. I received documentation showing that I had until December 2014 to pay my delinquent 2011 taxes in full. I also received a payment schedule. I paid more than the Treasurer claimed I owed for 2011.
10. A Wayne County Treasurer document in my possession and dated 03/31/2015 erroneously reflects a balance for 2012 taxes on that date of \$2,750.87.
11. On 01/14/2015, I entered into a payment agreement with the County of Wayne and paid \$480 towards the 2012 taxes.
12. The Wayne County FOIA documents for my property do not contain any pictures of certified mail envelopes nor receipts. The mail log reflects the fact that the Certified mail the Treasurer claims he sent me was not received. I have reviewed the USPS report on all 9 certified mailings that the Treasurer claims were sent and all appear to have been sent somewhere on November 21, 2014 and reported as undeliverable on November 26, 2014. The PA 123 Notifications Document reflects the fact that no first class mail was sent to me or my property for the 2012 taxes. The picture of the property produced by the County was not taken, as suggested by Nancy Jackson, on November 6, 2014 at 11:38am.
13. My base annual taxes, as assessed by Garden City in 2012, was \$2,866.00.
14. Another Wayne County Treasurer document, dated November 6, 2015 provides evidence that in addition to the \$1,000 payment made on 03/31/2015, we made two additional payments towards the 2012 taxes in 2015. Altogether, County records reflect the fact that we paid at least \$1,848.46 towards the 2012 taxes, which is 64% of my base 2012 taxes.

15. I did not receive any mail, nor did I receive a personal visit regarding delinquent 2012 taxes. No one else in or at my household received any notice either. There was no notice or any other documentation attached to my property in 2014 or 2015. Neither I nor anyone else at my property received notice that my property was going to be sold to Garden City or anyone else in 2015.
16. After making a payment on March 31, 2015, I was told by the staff of the Wayne County Treasurer that, like prior years, that my house would not be sold this year and that I had until the end of December 2015 to pay my delinquent 2012 taxes.
17. I was in a bad car accident and was struggling financially, but have been doing everything I could to save my home for me and my family.
18. If I had known that I would not be given until the end of the year to pay my delinquency, or that it was possible for the City to purchase my property before the tax auction, I would have paid any amounts I owed in full, by borrowing against the equity in my mortgage-free home, or by borrowing from a family or friend. As a last resort, I could have and would have been able to sell the property, and keep the balance of the equity.
19. Upon receiving a notice to quit, I searched for answers, and was told by Wayne County and Garden City that it was too late. They refused to even offer the most basic information.
20. My credit has been damaged by this illegal foreclosure. I am emotionally distressed, and I want to keep my home. I am ready to pay any amounts I owe. I have been illegally denied equal protection and due process of law guaranteed by the laws and constitutions of the State of Michigan and the United States of America.

Further affiant sayeth not.

Dated: December 23, 2015

Eleanor Ewald
ELEANOR EWALD

Subscribed and Sworn to before me
on this 23rd day of December 2015.

ROCHELLE BERRY
Notary Public, State of Michigan
County of Wayne
My Commission Expires 10-03-2021
Acting in the County of Wayne

Rochelle Berry
Notary Public, Wayne County, State of Michigan

AFFIDAVIT OF ERNEST FOREST

I, Ernest Forest, having been duly sworn, am prepared to testify that the following statements are true to the best of my knowledge, information and belief:

1. I am a citizen of the United States and the State of Michigan.
2. I own and reside in my home in the County of Wayne, State of Michigan with the common address of 1530 University Avenue, Lincoln Park, Michigan, 48146-1641 ("property").
3. I acquired ownership in the home pursuant to a deed on 4/27/2003, recorded in Liber 40296, Page 0303, Wayne County Records. The home has been owned by members of my family for 52 years.
4. I filed for and was otherwise entitled to a Principal Residence Exemption ("PRE") for the purpose of property tax assessments recently in 2015.
5. However, I only learned today that my PRE was not applied to earlier tax years in which I was eligible, including tax years 2010-2014. I intend on appealing this revocation/denial immediately.
6. The "true cash value" used to calculate the taxable value of my property for 2014 was \$43,600. Thus, the illegal denial of my PRE resulted in an illegal assessment of approximately \$392.40 plus interest and fees for each year during the 2011-2014 tax years.
7. Additionally, it appears that the City of Lincoln Park applied an unexplained "assessment" to my summer tax bill for years 2012-2014 in the following amounts \$40.90 (2012), \$38.87 (2013), and \$39.25 (2014) for a total of \$119.02 in "special assessments" that I did not owe.

8. I have not yet received nor examined the FOIA documents for my foreclosure file. However, neither I nor anyone at my household was sent or left any notice of the 2015 tax foreclosure and sale by which the property was deeded to the City of Lincoln Park.
9. I have struggled financially since my wife died of cancer in 2009, but have been doing everything I could to save my home for me and my family.
10. If I had known that I would not be given until the tax auction to pay my delinquency, or that it was possible for the City to purchase my property before the tax auction, I would have paid any amounts I owed in full, by borrowing against the equity in my mortgage-free home, or by borrowing from a family or friend. As a last resort, I could have and would have been able to sell the property, and keep the balance of the equity.
11. I attempted to pay any amounts that were due and was told by Wayne County and the City of Lincoln Park that it was too late. They refused to even offer the most basic information.
12. My credit has been damaged by this illegal foreclosure. I am emotionally distressed, and I want to keep my home. I am ready to pay any amounts I owe. I have been illegally denied equal protection and due process of law guaranteed by the laws and constitutions of the State of Michigan and the United States of America.

Further affiant sayeth not.
Dated: December 23, 2015

Subscribed and Sworn to before me
on this 23rd day of December 2015.


Notary Public, Wayne County, State of Michigan


ERNEST FOREST

ROCHELLE BERRY
Notary Public, State of Michigan
County of Wayne
My Commission Expires 10-03-2021
Acting in the County of Wayne

AFFIDAVIT OF SONIA VARGAS

I, Sonia Vargas, having been duly sworn, am prepared to testify that the following statements are true to the best of my knowledge, information and belief:

1. I am a citizen of the United States and the State of Michigan.
2. I own and reside in my home in the County of Wayne, State of Michigan with the common address of 3006 Green Street, Lincoln Park, Michigan 48146-3259 ("property").
3. I acquired ownership in the home pursuant to a land contract dated January 9, 2012, to which I was to receive a warranty deed. Although I have satisfied the land contract in full, it does not appear that a warranty deed has ever been recorded with the Wayne County Register of Deeds for the property.
4. I filed for and was otherwise entitled to a Principal Residence Exemption ("PRE") for the purpose of property tax assessments in 2012.
5. I only learned today that my PRE was apparently revoked or denied, without notice, for tax years 2012-2015. I received no notice of the denial. I intend on appealing this revocation/denial immediately.
6. The "true cash value" used to calculate the taxable value of my property for 2015 was \$72,200. Thus, the illegal denial of my PRE resulted in an illegal assessment of approximately \$649.80 plus interest and fees for each year during the 2012-2015 tax years.
7. Additionally, it appears that the City of Lincoln Park applied an unexplained "assessments" to my tax bills for years 2013-2015 in the following amounts \$167.50 (2013), \$38.45 (2014), and \$99.13 (2015) for a total of \$305.08 in "special assessments" that I did not owe.

8. I have not yet received nor examined the FOIA documents for my foreclosure file.
- However, neither I nor anyone at my household was sent or left any notice of the 2015 tax foreclosure and sale by which the property was deeded to the City of Lincoln Park.
9. Pursuant to the purchase agreement I signed with the land contract vendor, my understanding is that the vendor would pay the property taxes. Because I never received any delinquency statement, I assumed they were paid in full, and only found out about the foreclosure when I received a notice to quit in the mail.
10. If I had known that the delinquency even existed, or that it was possible for the City to purchase my property before the tax auction, I would have paid any amounts I owed in full.
11. I attempted to pay any amounts that were due and was told by Wayne County and the City of Lincoln Park that it was too late. They refused to even offer the most basic information.
12. My credit has been damaged by this illegal foreclosure. I am emotionally distressed, and I want to keep my home. I am ready to pay any amounts I owe. I have been illegally denied equal protection and due process of law guaranteed by the laws and constitutions of the State of Michigan and the United States of America.

Further affiant sayeth not.
Dated: December 23, 2015

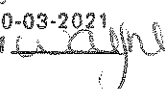
Subscribed and Sworn to before me
on this 23rd day of December 2015.



Notary Public, Wayne County, State of Michigan



SONIA VARGAS

ROCHELLE BERRY
Notary Public, State of Michigan
County of Wayne
My Commission Expires 10-03-2021
Acting in the County of 

AFFIDAVIT OF TIMOTHY PADDEN

I, Timothy Padden, having been duly sworn, am prepared to testify that the following statements are true to the best of my knowledge, information and belief:

1. I am a citizen of the United States and the State of Michigan.
2. I own and reside in my home in the County of Wayne, State of Michigan with the common address of 1814 Pagel St., Lincoln Park, Michigan, 48146 ("property").
3. I acquired ownership in the home pursuant to a deed on 01/02/2006, recorded in Liber 44199, Page 1109, Wayne County Records.
4. I was entitled to a Principal Residence Exemption ("PRE") for the purpose of property tax assessments for the years 2006-2015.
5. I only learned today that my PRE was apparently revoked or denied, without notice, for tax years 2011. I received no notice of the denial.
6. The "true cash value" used to calculate the taxable value of my property for 2015 was \$44,800. Thus, the illegal denial of my PRE resulted in an illegal assessment of approximately \$806.40 plus interest and fees.
7. A Wayne County Treasurer document in my possession reflects the fact that I paid all taxes up to and including the 2011 delinquent taxes.
8. I attempted to enter into a payment agreement for delinquent 2012 taxes in March and was told that I could not apply for a payment agreement until August, and that I should return after August 3rd. Being otherwise eligible for relief under the policies stated by the Wayne County Treasurer, I was intentionally and arbitrarily denied the ability to apply for and obtain the relief made available to thousands of others.
9. I have phone records that prove that I repeatedly sought assistance and was denied equal protection, reaffirming this outrageous fact.

10. The Wayne County FOIA documents for my property do not contain any pictures of the certified mail envelopes nor receipts that the County claims it sent to me, only a document that appears to be a copy of a letter sent to MERS, who has no interest in the property, and was returned to sender. The mail log reflects the fact that the certified mail the Treasurer claims he sent me was not delivered nor received. I have reviewed the USPS report on all 6 certified mailings that the Treasurer claims were sent to my address and all 6 appear to have been sent somewhere in the City of Detroit in December 2015 and reported as undeliverable on December 20, 2014. The PA 123 Notifications Document reflects the fact that no first class mail was sent to me or my property for the 2012 taxes. The picture of the property produced by the County was not taken, as suggested by Nancy Jackson, on November 13, 2014 at 9:31am.

11. My base annual taxes, as assessed by Lincoln Park in 2012, was \$1,268.92.

12. I did not receive any mail, nor did I receive a personal visit regarding delinquent 2012 taxes. No one else in or at my household received any notice either. There was no notice or any other documentation attached to my property in 2014 or 2015. Neither I nor anyone else at my property received notice that my property was going to be sold to Lincoln Park or anyone else in 2015.

13. After requesting a payment agreement, I was told by the staff of the Wayne County Treasurer that my house would not be sold this year and that I had to come into the office between August 3-7 2015 to make a payment agreement pay my delinquent 2012 taxes. The staff told me that I could only get a payment plan if the City of Lincoln Park was not going to purchase my property. I thought this was odd, but I visited the City and spoke to the City staff and was told that the City was not going to buy anyone's property. Brad

Coulter, the City's Emergency Manager, later stated to me that he did not inform city staff of the City's intention to buy my property. Despite my explanation that I thought I had more time to pay, Mr. Coulter did not offer any assistance.

14. I was struggling financially temporarily but have been doing everything I could to save my home for me and my family.

15. If I had known that I would not be given until the end of the year to pay my delinquency, or that it was possible for the City to purchase my property before the tax auction, I would have paid any amounts I owed in full, by borrowing against the equity in my mortgage-free home, or by borrowing from a family or friend. As a last resort, I could have and would have been able to sell the property, and keep the balance of the equity.

16. My credit has been damaged by this illegal foreclosure. My wife and I are emotionally distressed, and I want to keep my home. I am ready to pay any amounts I owe. I have been illegally denied equal protection and due process of law guaranteed by the laws and constitutions of the State of Michigan and the United States of America.

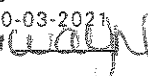
Further affiant sayeth not.

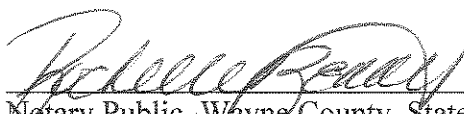
Dated: December 22, 2015



TIMOTHY PADDEN

Subscribed and Sworn to before me
on this 22nd day of December 2015.

ROCHELLE BERRY
Notary Public, State of Michigan
County of Wayne
My Commission Expires 10-03-2021
Acting in the County of 



Notary Public, Wayne County, State of Michigan

AFFIDAVIT OF ANTHONY CRUMP

I, Anthony Crump, having been duly sworn, am prepared to testify that the following statements are true to the best of my knowledge, information and belief:

1. I am a citizen of the United States and the State of Michigan.
2. I own and reside in my home in the County of Wayne, State of Michigan with the common address of 1405 Euclid Street, Lincoln Park, Michigan 48146 ("property").
3. I acquired ownership in the home pursuant to a land contract in 2007. I do not believe that a deed or any document indicating that the land contract was paid in full was filed in the Wayne County Records. However, I fulfilled all payment requirements on the land contract within one year of purchase, and the seller will issue a deed for me to record.
4. I was granted and was otherwise entitled to a Principal Residence Exemption ("PRE") for the purpose of property tax assessments throughout my period of ownership of the property.
5. I only learned today that my PRE was apparently revoked or denied, without notice, for at least tax years 2011-2015. I do not know when my PRE was revoked, but at all relevant times the property has been my primary residence. I intend on appealing this revocation/denial immediately.
6. The "true cash value" used to calculate the taxable value of my property for 2015 was \$32,000. Thus, the illegal revocation of my PRE resulted in an illegal assessment of approximately \$288.00 plus interest and fees for each year during at least the 2011-2015 tax years.
7. Additionally, it appears that the City of Lincoln Park applied an unexplained "assessment" to my tax bills for years 2011-2015 in the following amounts \$261.78

- (2011), \$258.74 (2012), \$38.77 (2013), \$39.10 (2014), and \$305.09 (2015), for a total of \$903.48 in "special assessments" that I did not owe over the past five tax years.
8. I received documentation showing that I had until December 2015 to pay my delinquent 2012 taxes in full. I also received a payment schedule.
 9. A Wayne County Treasurer document in my possession reflects a balance for 2012 taxes of \$1,113.87, although it indicates that my base tax for that year was \$1,622.21.
 10. On March 31, 2014 I entered into a payment agreement for delinquent 2011 taxes.
 11. I received documentation showing that I had until December 2014 to pay my delinquent 2011 taxes in full. I also received a payment schedule. I paid my entire 2011 balance.
 12. I also entered into a payment agreement for delinquent 2012 taxes with the County and paid \$508.34 towards the 2012 taxes.
 13. The Wayne County FOIA documents for my property do not contain any pictures of certified mail envelopes nor receipts. The mail log reflects the fact that the Certified mail the Treasurer claims he sent me was not received. I have reviewed the USPS report on all five certified mailings that the Treasurer claims were sent. The only mailing allegedly sent to myself was returned to the Treasurer and not delivered and does not even have tracking information through the USPS report. The other four certified mailings were sent to financial institutions which have no ownership interest in the property, and if they did receive these mailings, in no way notified me of their existence. The PA 123 Notifications Document reflects the fact that no first class mail was sent to me or my property for the 2012 taxes. The picture of the property produced by the County was not taken, as suggested by Karen Frabotta, on November 13, 2014 at 2:31pm.

14. My base annual taxes, as assessed by Lincoln Park in 2012, was \$1,272.08, without my PRE.
15. I did not receive any mail, nor did I receive a personal visit regarding delinquent 2012 taxes. No one else in or at my household received any notice either. There was no notice attached to my property in 2014 or 2015. Neither I nor anyone else at my property received notice that my property was going to be sold to the City of Lincoln Park or anyone else in 2015.
16. After making a payment on my 2012 taxes, I was told by the staff of the Wayne County Treasurer that my house would not be sold this year and that I had until the end of December 2015 to pay my delinquent 2012 taxes.
17. If I had known that I would not be given until the end of the year to pay my delinquency, or that it was possible for the City to purchase my property before the tax auction, I would have paid any amounts I owed in full, by borrowing against the equity in my mortgage-free home, or by borrowing from a family or friend. As a last resort, I could have and would have been able to sell the property, and keep the balance of the equity.
18. Upon receiving a notice to quit, I searched for answers, and was told by Wayne County and Lincoln Park that it was too late. They refused to even offer the most basic information and representatives of Lincoln Park have lied to me and told me that I did not even live in my home, which is absolutely untrue.
19. My credit has been damaged by this illegal foreclosure. I am emotionally distressed, and I want to keep my home. I am ready to pay any amounts I owe, but I believe I have been illegally denied equal protection and due process of the law that are guaranteed by the laws and constitutions of the State of Michigan, and the United States.

Further affiant sayeth not.

Dated: December 23, 2015

ANTHONY CRUMP

Subscribed and Sworn to before me
on this 23rd day of December 2015.

Notary Public, Wayne County, State of Michigan

AFFIDAVIT OF CARL NOVAK

I, Carl Novak, having been duly sworn, am prepared to testify that the following statements are true to the best of my knowledge, information and belief:

1. I am a citizen of the United States and the State of Michigan.
2. I own and reside in my home in the County of Wayne, State of Michigan with the common address of 34910 Phyllis Street, Wayne Michigan, 48135-4206 ("property").
3. I acquired ownership in the home pursuant to a deed in 1981. I do not have a copy of this deed but I believe it was recorded with the Wayne County Register of Deeds.
4. The home is my principal residence and I have had a Principal Residence Exemption ("PRE") for the purpose of property tax assessments for numerous years.
5. It appears that the City of Wayne applied an unexplained "assessment" to my summer tax bill for years 2012-2015 in the following amounts \$48.00 (2012), \$48.00 (2013), \$72.50 (2014), and \$2,043.76 (2015) for a total of \$2,212.60 in "special assessments" that I did not owe.
6. The City of Wayne has repeatedly targeted me and my property by removing personal property from my residence without notice, court hearing, or any documentation.
7. I have not yet received nor examined the FOIA documents for my foreclosure file. However, neither I nor anyone at my household was sent or left any notice of the 2015 tax foreclosure and sale by which the property was deeded to the City of Wayne.
8. I have been disabled for seven years, leading to my financial difficulty, but I have done everything I can to try and save my home.
9. If I had known that I would not be given until the tax auction to pay my delinquency, or that it was possible for the City to purchase my property before the tax auction, I would have paid any amounts I owed in full, by borrowing against the equity in my mortgage-

free home, or by borrowing from a family or friend. As a last resort, I could have and would have been able to sell the property, and keep the balance of the equity.

10. I attempted to pay any amounts that were due and was told by Wayne County and the City of Wayne that it was too late. They refused to even offer the most basic information.

11. My credit has been damaged by this illegal foreclosure. I am emotionally distressed, and I want to keep my home. I am ready to pay any amounts I owe. I have been illegally denied equal protection and due process of law guaranteed by the laws and constitutions of the State of Michigan and the United States of America.

Further affiant sayeth not.

Dated: December 23, 2015

CARL NOVAK

Subscribed and Sworn to before me
on this 23rd day of December 2015.

Notary Public, Wayne County, State of Michigan

AFFIDAVIT OF RICHARD ROBBS

I, Richard Robbs, having been duly sworn, am prepared to testify that the following statements are true to the best of my knowledge, information and belief:

1. I am a citizen of the United States and the State of Michigan.
2. I own and reside in my home in the County of Wayne, State of Michigan with the common address of 3805 Niagara, Wayne Michigan, 48135-4206 ("property").
3. I acquired ownership in the home pursuant to a deed on 01/30/2012, recorded in Liber 49640, Page 0289, Wayne County Records.
4. I filed for and was otherwise entitled to a Principal Residence Exemption ("PRE") for the purpose of property tax assessments in 2012.
5. I only learned today that my PRE was apparently revoked or denied, without notice, for tax years 2012-2015. I received no notice of the denial. I intend on appealing this revocation/denial immediately.
6. The "true cash value" used to calculate the taxable value of my property for 2015 was \$88,592. Thus, the illegal denial of my PRE resulted in an illegal assessment of approximately \$797.32 plus interest and fees for each year during the 2012-2015 tax years.
7. Additionally, it appears that the City of Wayne applied an unexplained "assessment" to my summer tax bill for years 2013-2015 in the following amounts 310.20 (2013), 367.49 (2014), and 105.74 (2015) for a total of \$783.43 in "special assessments" that I did not owe.
8. On March 6, 2015 I entered into a payment agreement for delinquent 2012 taxes and paid \$440 towards the 2012 taxes.

9. After making a payment on 03/06/2015, I was told by the staff of the Wayne County Treasurer that my house would not be sold this year and that I had until the end of December 2015 to pay my delinquent 2012 taxes.
10. I received documentation showing that I had until December 2015 to pay my delinquent 2012 taxes in full. I also received a payment schedule. On the same day, March 6, 2015 a Wayne County Treasurer staff member set the payment amounts, and told me that I had until the end of the year to pay the balance.
11. On July 31st, 2015, I visited the offices of the Wayne County Treasurer to make a payment. I was falsely told that I could not make a payment, and that I did not have a payment agreement, and that I should return to the office between August 3-7 2015. A Wayne County Treasurer staff member then wrote those instructions, in her own handwriting, on a document I have in my possession, bearing the same date.
12. I have not yet received nor examined the FOIA documents for my foreclosure file.
However, neither I nor anyone at my household was sent or left any notice of the 2015 tax foreclosure and sale by which the property was deeded to the City of Wayne.
13. I was struggling financially temporarily, but have been doing everything I could to save my home for me and my family.
14. If I had known that I would not be given until the end of the year to pay my delinquency, or that it was possible for the City to purchase my property before the tax auction, I would have paid any amounts I owed in full, by borrowing against the equity in my mortgage-free home, or by borrowing from a family or friend. As a last resort, I could have and would have been able to sell the property, and keep the balance of the equity.

15. I attempted to pay any amounts that were due and was told by Wayne County and the City of Wayne that it was too late. They refused to even offer the most basic information.
16. My credit has been damaged by this illegal foreclosure. I am emotionally distressed, and I want to keep my home. I am ready to pay any amounts I owe. I have been illegally denied equal protection and due process of law guaranteed by the laws and constitutions of the State of Michigan and the United States of America.

Further affiant sayeth not.

Dated: December 23, 2015

RICHARD ROBBS

Subscribed and Sworn to before me
on this 23rd day of December 2015.

Notary Public, Wayne County, State of Michigan

AFFIDAVIT OF ANDREA ROWE

I, Andrea Rowe, having been duly sworn, am prepared to testify that the following statements are true to the best of my knowledge, information and belief:

1. I am a citizen of the United States and the State of Michigan.
2. I own and reside in my home in the County of Wayne, State of Michigan with the common address of 32957 Florence Street, Garden City, Michigan, 48135 ("property").
3. I acquired ownership in the home from my mother, Paula Newcomb. To my knowledge, a deed has not been recorded in the Wayne County Land Records. The property was transferred by my mother Paula Newcomb to myself, the transferee. The home has been owned by my family and has remained in my family's possession since the 1950's.
4. I am entitled to and have been entitled to a Principal Residence Exemption ("PRE") for the purpose of property tax assessments throughout my period of ownership of the property.
5. I only learned today that my PRE was apparently revoked or denied, without notice, for at least tax years 2011-2015. I do not know when my PRE was revoked, but at all relevant times the property has been my primary residence. I intend on appealing this revocation/denial immediately.
6. The "true cash value" used to calculate the taxable value of my property for 2015 was \$69,160. Thus, the illegal revocation of my PRE resulted in an illegal assessment of approximately \$622.44 plus interest and fees for each year during at least the 2011-2015 tax years.
7. It appears that Garden City applied an unexplained "assessment" to my summer tax bill for years 2011-2015 in the following amounts \$353.79 (2011), \$641.92 (2012), \$1,178.23

(2013), \$1,621.86 (2014), and \$1,304.14 (2015) for a total of \$5,099.94 in "special assessments" that I did not owe on the property.

8. A Wayne County Treasurer document in my possession reflects the fact that I paid all taxes up to and including the 2011 delinquent taxes.
9. On January 22, 2015, my mother Paula Newcomb, on my behalf entered into a payment agreement with the County of Wayne and paid \$591.00 towards the 2012 taxes.
10. After making a payment on January 22, 2015, we were told by the staff of the Wayne County Treasurer that, like prior years, that my house would not be sold this year and that we had until the end of December 2015 to pay my delinquent 2012 taxes.
11. The Wayne County FOIA documents for my property do not contain any pictures of certified mail envelopes nor receipts of any documents delivered to my property or myself. The mail log does not reflect that the certified mail the Treasurer claims he sent to myself or my mother were delivered nor received. The PA 123 Notifications Document reflects the fact that no first class mail was sent to me or my property for the 2012 taxes. The picture of the property produced by the County was not taken, as suggested by Nancy Jackson, on November 7, 2014 at 2:49pm.
12. My base annual taxes, as assessed by Garden City in 2012, was \$2,295.69.
13. I did not receive any mail, nor did I receive a personal visit regarding delinquent 2012 taxes. No one else in or at my household received any notice either. There was no notice or any other documentation attached to my property in 2014 or 2015. Neither I nor anyone else at my property received notice that my property was going to be sold to Garden City or anyone else in 2015.

14. After making a payment on my 2012 taxes in 2015, I was told by the staff of the Wayne County Treasurer that my house was not in jeopardy of being sold so long as I returned to pay the remainder of my taxes due in August 2015. A member of my family returned to the Wayne County Treasurer to pay my taxes due on August 10, 2015, but was denied the opportunity.
15. My family has been struggling financially temporarily due to a job loss, and was recently re-employed, but have been doing everything I could to save my home for me and my family.
16. If I had known that I would not be given until the time specified by the Wayne County Treasurer to pay my delinquency, or that it was possible for the City to purchase my property before the tax auction, I would have paid any amounts I owed in full, by borrowing against the equity in my mortgage-free home, or by borrowing from a family or friend. As a last resort, I could have and would have been able to sell the property, and keep the balance of the equity.
17. My credit has been damaged by this illegal foreclosure. I am emotionally distressed, and I want to keep my home. I am ready to pay any amounts I owe. I have been illegally denied equal protection and due process of law guaranteed by the laws and constitutions of the State of Michigan and the United States of America.

Further affiant sayeth not.

Dated: December 23, 2015

ANDREA ROWE

Subscribed and Sworn to before me
on this 23rd day of December 2015.

Notary Public, Wayne County, State of Michigan

AFFIDAVIT OF SHAEFA MOHAMED

I, Shaefa Mohamed, having been duly sworn, am prepared to testify that the following statements are true to the best of my knowledge, information and belief:

1. I am a citizen of the United States and the State of Michigan.
2. I own and reside in my home in the County of Wayne, State of Michigan with the common address of 4743 Orchard Avenue Dearborn, Michigan, 48126("property").
3. I acquired ownership in the home pursuant to a deed on 02/14/2011, recorded in Liber 49036, Page 0036, Wayne County Records.
4. I filed for and was otherwise entitled to a Principal Residence Exemption ("PRE") for the purpose of property tax assessments in 2011-2015. The certificate of occupancy issued by the City of Dearborn on March 20, 2013 states that my family and I are owner-occupants.
5. I only learned today that the PRE was apparently revoked or denied, without notice, for tax years 2012-2015. I received no notice of the denial. I intend on appealing this revocation/denial immediately.
6. The "true cash value" used to calculate the taxable value of my property for 2015 was \$54,962. Thus, the illegal denial of my PRE resulted in an illegal assessment of approximately \$989.31 plus interest and fees for each year during the 2012-2015 tax years.
7. Additionally, it appears that Dearborn applied an unexplained "assessment" to my summer tax bill for years 2013-2015 in the following amounts 1472.76 (2012), 1962.11 (2013), 1148.70 (2014), and 1196.39 (2015) for a total of \$5,779.96 in "special assessments" that I did not owe.
8. On March 31, 2015, I entered into a payment agreement for delinquent 2012 taxes and made a \$1,127 payment towards the 2012 taxes I made another \$1,127 payment

thereafter. I received documentation showing that I had until December 2015 to pay my delinquent 2012 taxes in full.

9. On July 29th, 2015, my son returned to the Treasurer's office with a \$5,000 cashier's check, dated July 29, 2015, intent on paying what he believed we owed. The female staff member told him she could not help him yet and that he should return between August 3-7, 2015 to pay the estimated balance of \$4,504.00. The staff member even handwrote this instruction on the Tax Statement provided to my son by that staffer, and dated the same day. My son returned to the office on August 7, 2015 and was told, to our dismay, that the property had been sold to the City of Dearborn, and nothing could be done. The property had not yet in fact been sold. The tax deed to the Treasurer, recorded in Liber 52414, Page 1174 Wayne County Records is dated August 21st, 2015 and the deed from the Treasurer to the City of Dearborn, recorded in Liber 52415, Page 1440 Wayne County Records reflects a sales date of August 26, 2015.
10. The Wayne County FOIA documents for my property do not contain any pictures of certified mail envelopes nor receipts. The mail log reflects the fact that the Certified mail the Treasurer claims he sent me was neither sent to me nor received. I have reviewed the USPS report on all 4 of the certified mailings that the Treasurer claims were sent, to 2 separate addresses, and all appear to have been sent somewhere on November 20th, 2014, and were accepted for shipping on November 21, 2014 at 10:56am, at a location in the zip code 48233 in the City of Detroit, but none were ever delivered. The PA 123 Notifications document reflects the fact that no first class mail was sent to me or my property for the 2012 taxes. The picture of the property produced by the County was not taken, as suggested by Richard Kosmack, on October 28, 2014 at 4:32pm.

11. My base annual taxes, as assessed by Dearborn in 2012, was \$4,764.75. If the PRE had not been wrongfully denied or revoked by the City in 2011, my base 2012 property taxes, including the unexplained special assessment amount would have been \$3,775.84
12. Altogether, County records reflect the fact that we paid at least \$2,254.00 towards the 2012 taxes, which is 47% of my base 2012 taxes as wrongfully assessed, but 60% of the base tax including the unexplained "special assessment" in the amount of \$1,472.76. Therefore, I paid an amount in excess of 60% of the total "TIPF" owed prior to April 2015, and my property should have been removed from foreclosure regardless of the fact that I was given until December 2015 to pay the balance claimed, and the property was sold to the City of Dearborn on August 26, 2015.
13. I did not receive any mail, nor did I receive a personal visit regarding delinquent 2012 taxes. No one else in or at my household received any notice either. There was no notice or any other documentation attached to my property in 2014 or 2015. Neither I nor anyone else at my property received notice that my property was going to be sold to Dearborn or anyone else in 2015.
14. After making a payment on March 31, 2015, we were told by the staff of the Wayne County Treasurer that my house would not be sold this year and that I had until the end of December 2015 to pay my delinquent 2012 taxes.
15. I was struggling financially temporarily, after discovering that my husband failed to pay property taxes as promised, but have been doing everything I could to save my home for me and my family.
16. If I had known that I would not be given until the end of the year to pay my falsely-alleged delinquency, or that it was possible for the City to purchase my property before

the tax auction, I would have paid any amounts I owed in full, by borrowing against the equity in my mortgage-free home, or by borrowing from a family or friend. As a last resort, I could have and would have been able to sell the property, and keep the balance of the equity.

17. Upon receiving a notice to quit, we searched for answers, and we were told by Wayne County and the City of Dearborn that it was too late. They refused to even offer the most basic information.
18. Despite the approval of other property owners' nearly identical requests to repurchase homes from the City of Dearborn, the City denied my request, despite my meeting and exceeding every criteria that was established during the consideration of the requests to repurchase. There was no rational basis for this discrimination.
19. My credit has been damaged by this illegal foreclosure. I am emotionally distressed, and I want to keep my home. I am ready to pay any amounts I owe. I have been illegally denied equal protection and due process of law guaranteed by the laws and constitutions of the State of Michigan and the United States of America.

Further affiant sayeth not.

Dated: December 23, 2015

SHAEFA MOHAMED

Subscribed and Sworn to before me
on this 23rd day of December 2015.

Notary Public, Wayne County, State of Michigan

AFFIDAVIT OF BRANDY GUTIERREZ

I, Brandy Gutierrez, having been duly sworn, am prepared to testify that the following statements are true to the best of my knowledge, information and belief:

1. I am a citizen of the United States and the State of Michigan.
2. I own and reside in my home in the County of Wayne, State of Michigan with the common address of 934 Kings Hwy. Lincoln Park, Michigan, 48146-4206 ("property").
3. I acquired ownership in the home pursuant to a deed on 06/24/2010, recorded in Liber 48680, Page 0874, Wayne County Records.
4. I filed for and was otherwise entitled to a Principal Residence Exemption ("PRE") for the purpose of property tax assessments in 2010.
5. I only learned today that my PRE was apparently revoked or denied, without notice, for tax years 2010-2015. I received no notice of the denial. I intend on appealing this revocation/denial immediately.
6. The "true cash value" used to calculate the taxable value of my property for 2015 was \$71,000. Thus, the illegal denial of my PRE resulted in an illegal assessment of approximately \$1,278.00 plus interest and fees for each year during the 2010-2015 tax years.
7. Additionally, it appears that Lincoln Park applied an unexplained "assessment" to my summer tax bill for years 2012-2014 in the following amounts 234.88 (2012), 168.22 (2013), and 567.17 (2014), for a total of \$970.27 in "special assessments" that I did not owe. Individual males who identified themselves as City employees repeatedly threatened to turn off my water and condemn the property, despite my payment of water bills.

8. I received documentation showing that I had until December 2015 to pay my delinquent 2012 taxes in full. I also received a payment schedule. On the same day, a Wayne County Treasurer staff member set the payment amounts, gave me an erroneous receipt for less than I paid, and told me that I had until the end of the year to pay the balance. I was shocked and confused to receive a Notice to Quit from JSR Funding, LLC in October of this year.
9. A Wayne County Treasurer document in my possession and dated 12/08/2015 falsely reflects a balance for 2012 taxes on that date of \$2,483.67.
10. On December 8, 2014 I entered into a payment agreement for delinquent 2012 taxes and paid \$2,070.74 towards the 2012 taxes.
11. The Wayne County FOIA documents for my property do not contain any pictures of certified mail envelopes nor receipts. The mail log reflects the fact that the Certified mail the Treasurer claims he sent me was not received. I have reviewed the USPS report on all 3 certified mailings that the Treasurer claims were sent and all appear to have been sent somewhere on November 21, 2014 and reported as undeliverable on December 1, 2014. The PA 123 Notifications Document reflects the fact that no first class mail was sent to me or my property for the 2012 taxes. The picture of the property produced by the County was not taken, as suggested by Nancy Jackson, on November 13, 2014 at 4:39pm.
12. My base annual taxes, as assessed by Lincoln Park in 2012, was \$2,972.44.
13. Altogether, County records reflect the fact that we paid at least \$2,070.74 towards the 2012 taxes, which is 69% of my base 2012 taxes.
14. I did not receive any mail, nor did I receive a personal visit regarding delinquent 2012 taxes. No one else in or at my household received any notice either. There was no notice

or any other documentation attached to my property in 2014 or 2015. Neither I nor anyone else at my property received notice that my property was going to be sold to Lincoln Park or anyone else in 2015.

15. After making a payment on 12/08/2014, I was told by the staff of the Wayne County Treasurer that my house would not be sold this year and that I had until the end of December 2015 to pay my delinquent 2012 taxes.
16. I was struggling financially temporarily, after discovering that my husband failed to pay property taxes as promised, but have been doing everything I could to save my home for me and my family.
17. If I had known that I would not be given until the end of the year to pay my delinquency, or that it was possible for the City to purchase my property before the tax auction, I would have paid any amounts I owed in full, by borrowing against the equity in my mortgage-free home, or by borrowing from a family or friend. As a last resort, I could have and would have been able to sell the property, and keep the balance of the equity.
18. Upon receiving a notice to quit, I searched for answers, and was told by Wayne County and Lincoln Park that it was too late. They refused to even offer the most basic information.
19. My credit has been damaged by this illegal foreclosure. I am emotionally distressed, and I want to keep my home. I am ready to pay any amounts I owe. I have been illegally denied equal protection and due process of law guaranteed by the laws and constitutions of the State of Michigan and the United States of America.

Further affiant sayeth not.

Dated: December 23, 2015

BRANDY GUTIERREZ

Subscribed and Sworn to before me
on this 23rd day of December 2015.

Notary Public, Wayne County, State of Michigan

AFFIDAVIT OF WARREN WICK

I, Warren Wick, having been duly sworn, am prepared to testify that the following statements are true to the best of my knowledge, information and belief:

1. I am a citizen of the United States and the State of Michigan.
2. I own and reside in my home in the County of Wayne, State of Michigan with the common address of 9107 San Jose, Redford, Michigan, 48239-2319 ("property").
3. I acquired ownership in the home pursuant to a deed on November 30, 2011, recorded with the Wayne County Register of Deeds, Liber 49505, Page 0717.
4. The home is my principal residence and I have had a Principal Residence Exemption ("PRE") for the purpose of property tax assessments since I acquired the property.
5. It appears that the Township of Redford applied an unexplained "assessment" to my tax bills for years 2011 (winter) and 2013-2014 in the following amounts: \$570.92 (2011), \$13.00 (2013), and \$160.08 (2014), for a total of \$744.00 in "special assessments" that I did not owe.
6. I have not yet received nor examined the FOIA documents for my foreclosure file. However, neither I nor anyone at my household was sent or left any notice of the 2015 tax foreclosure and sale by which the property was deeded to the Township of Redford
7. I was struggling financially temporarily, but have been doing everything I could to save my home for me and my family.
8. In 2014, I entered into a property tax payment plan with the Wayne County Treasurer, for payment of my 2011 taxes. I received documentation showing that I had until December 2014 to pay my delinquent 2011 taxes in full. I also received a payment schedule.
9. On March 30, 2015, I made a payment to the Wayne County Treasurer of \$204.00, which paid off the final amount on my 2011 taxes owing and part of which was applied to my

2012 taxes. At this time I was prepared to make further substantial payments to my 2012 tax balance, which I was told at the time was \$2,862.17. However, a representative of the Treasurer told me that a payment plan was unnecessary because I had until the auction to pay my taxes in whole and to come back at a later date.

10. On August 5, 2015, I returned to the Wayne County Treasurer before the auction, as instructed, and with a check for \$3,600.00, which would pay in full my 2012 delinquency. I was denied the opportunity to pay my taxes.
11. If I had known that I would not be given until the auction to pay my delinquency, or that it was possible for the Township to purchase my property before the tax auction, I would have paid any amounts I owed in full, by borrowing against the equity in my mortgage-free home if necessary, or by borrowing from a family or friend. As a last resort, I could have and would have been able to sell the property, and keep the balance of the equity.
12. I attempted to pay any amounts that were due and was told by Wayne County and the Township of Redford that it was too late. They refused to even offer the most basic information.
13. My credit has been damaged by this illegal foreclosure. I am emotionally distressed, and I want to keep my home. I am ready to pay any amounts I owe. I have been illegally denied equal protection and due process of law guaranteed by the laws and constitutions of the State of Michigan and the United States of America.

Further affiant sayeth not.

Dated: December 23, 2015

WARREN WICK

Subscribed and Sworn to before me
on this 23rd day of December 2015.

Notary Public, Wayne County, State of Michigan

EXHIBIT B

Court Address 6000 MIDDLEBELT ROAD
GARDEN CITY, MI 48135

Court Telephone
(734) 793-1680

Plaintiff ☐ Personal service
JSR FUNDING LLC//

YOU ARE DIRECTED TO APPEAR AT

☒ The court address above, courtroom _____

☐

V

Defendant ☐ Personal service
ALL OCCUPANTS// CHERYL FOSTER
30500 BARTON
GARDEN CITY, MI 48135

Judge: RICHARD L. HAMMER JR. P-25732

FOR THE FOLLOWING PURPOSE:

DAY DATE TIME

☐ Pre-trial Conf.

☐ Prelim Exam.

☐ Jury Selection

☐ Jury Trial

☐ Non-Jury Trial

☐ Sentencing

☐ Motion

☐ Arraignment

☐ Informal Hrg.

☐ Formal Hearing

☒ HEARING MON 1/04/16 9:30 AM
TERMINATION OF TENANCY

☐ The above matter is adjourned from

Pltf Atty/People ☐ Personal service
(248) 977-4182 P-59339
RICHARD DANIEL LINNELL
2804 ORCHARD LAKE RD
STE 203
KEEGO HARBOR, MI 48320

Defendant's Atty ☐ Personal service

Officer

If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Date issued: DEC. 15, 2015

Clerk of the Court

IMPORTANT: READ THIS CAREFULLY

1. Bring this notice with you.
2. No case may be adjourned except by authority of the judge for good cause shown.
3. FAILURE OF THE DEFENDANT TO APPEAR in a civil case may cause a default judgment to be entered. FAILURE OF THE PLAINTIFF TO APPEAR may result in a dismissal of the case.
4. FAILURE TO APPEAR in a criminal case may subject you to the penalty for contempt of court, and a bench warrant may be issued for your arrest.
5. If you intend to employ a lawyer, he or she should be notified of the date at once.
6. Fines, costs, and other financial obligations imposed by the court must be paid at the time of assessment.

Court Address 6000 MIDDLEBELT ROAD
GARDEN CITY, MI 48135

Court Telephone
(734) 793-1680

Plaintiff ☐ Personal service
JSR FUNDING LLC//
32525 MOUND ROAD
WARREN, MI 48092

YOU ARE DIRECTED TO APPEAR AT:

☒ The court address above, courtroom _____

☐

V

Defendant ☐ Personal service
ALL OCCUPANTS// ROBERT RADFORD
29724 MARQUETTE
GARDEN CITY, MI 48135

Judge: RICHARD L. HAMMER JR. 8-25732

FOR THE FOLLOWING PURPOSE:

☐ Pre-trial Conf. DAY DATE TIME

☐ Prelim Exam.

☐ Jury Selection

☐ Jury Trial

☐ Non-Jury Trial

☐ Sentencing

☐ Motion

☐ Arraignment

☐ Informal Hrg.

☐ Formal Hearing

☒ HEARING MON 1/04/16 9:30 AM
TERMINATION OF TENANCY

☐ The above matter is adjourned from

Pltf Atty/People ☐ Personal service
(248) 977-4182 P-59339
RICHARD DANIEL LINNELL
2804 ORCHARD LAKE RD
STE 203
KEEGO HARBOR, MI 48320

Defendant's Atty ☐ Personal service

Officer

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Clerk of the Court

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Court Address 6000 MIDDLEBELT ROAD
GARDEN CITY, MI 48135

Court Telephone
(734) 793-1680

Plaintiff ☐ Personal service
JSR FUNDING LLC//
32525 MOUND ROAD
WARREN, MI 48092

YOU ARE DIRECTED TO APPEAR AT:

☒ The court address above, courtroom _____

☐

V

Defendant ☐ Personal service
ALL OCCUPANTS// PAULA NEWCOMB
30706 HENNEPIN
GARDEN CITY, MI 48135

Judge: RICHARD L. HAMMER JR. P-25732

FOR THE FOLLOWING PURPOSE:

DAY DATE TIME

☐ Pre-trial Conf.

☐ Prelim Exam.

☐ Jury Selection

☐ Jury Trial

☐ Non-Jury Trial

Pltf Atty/People ☐ Personal service
(248) 977-4182 P-59339
RICHARD DANIEL LINNELL
2804 ORCHARD LAKE RD
STE 203
KEEGO HARBOR, MI 48320

☐ Sentencing

☐ Motion

☐ Arraignment

☐ Informal Hrg.

☐ Formal Hearing

☒ HEARING MON 1/04/16 9:30 AM
TERMINATION OF TENANCY

☐ The above matter is adjourned from

Defendant's Atty ☐ Personal service
(313) 288-8529 P-74551
TAREK MAHMOUD BAYDOUN
24513 FORD RD
DEARBORN, MI 48128

Officer

If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Date issued: DEC. 15, 2015

Clerk of the Court

IMPORTANT: READ THIS CAREFULLY

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5. If you intend to employ a lawyer, he or she should be notified of the date at once.
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Court Address 6000 MIDDLEBELT ROAD
GARDEN CITY, MI 48135

Court Telephone
(734) 743-1680

Plaintiff ☐ Personal service
JSR FUNDING LLC//
32525 MOUND ROAD
WARREN, MI 48092

YOU ARE DIRECTED TO APPEAR AT:

☒ The court address above, courtroom _____

☐

V

Defendant ☐ Personal service
ALL OCCUPANTS// *GARY ZALONEY*
30431 MARQUETTE
GARDEN CITY, MI 48135

Judge: RICHARD L. HAMMER JR. P-25732

FOR THE FOLLOWING PURPOSE:

☐ Pre-trial Conf. DAY DATE TIME

☐ Prelim Exam.

☐ Jury Selection

☐ Jury Trial

☐ Non-Jury Trial

☐ Sentencing

☐ Motion

☐ Arraignment

☐ Informal Hrg.

☐ Formal Hearing

☒ HEARING MON 1/04/16 9:30 AM
TERMINATION OF TENANCY

☐ The above matter is adjourned from

Pltff Atty/People ☐ Personal service
(248) 977-4182 P-59339
RICHARD DANIEL LINNELL
2804 ORCHARD LAKE RD
STE 203
KEEGO HARBOR, MI 48320

Defendant's Atty ☐ Personal service
(313) 288-8529 P-74551
TAREK MAHMOUD BAYDOUN
24513 FORD RD
DEARBORN, MI 48128

Officer

If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Date issued: DEC. 15, 2015

Clerk of the Court

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4. FAILURE TO APPEAR in a criminal case may subject you to the penalty for contempt of court, and a bench warrant may be issued for your arrest.
5. If you intend to employ a lawyer, he or she should be notified of the date at once.
6. Fines, costs, and other financial obligations imposed by the court must be paid at the time of assessment.

Court Address 1475 CLEOPHUS PARKWAY
LINCOLN PARK, MI 48146

Court Telephone
(313) 382-9311

☐ Personal service
FUNDING LLC//

YOU ARE DIRECTED TO APPEAR AT:

☒ The court address above, courtroom

☐

☐ Personal service
KOPPE/HENRY/AND ALL OCCUPANTS
1062 STEWART
LINCOLN PARK, MI 48146

Judge: DAVID J. ZELENAK P-34112

FOR THE FOLLOWING PURPOSE:

DAY DATE TIME
☒ Pre-trial Conf. WED 1/06/16 12:00 PM
TELEPHONE PRETRIAL SCH.

☐ Prelim Exam.

☐ Jury Selection

☐ Jury Trial

☐ Non-Jury Trial

☐ Sentencing

☐ Motion

☐ Arraignment

☐ Informal Hrg.

☐ Formal Hearing

☐

☒ The above matter is adjourned from
121615

If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements

Date issued: DEC. 17, 2015

Clerk of the Court

IMPORTANT: READ THIS CAREFULLY

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4. FAILURE TO APPEAR in a criminal case may subject you to the penalty for contempt of court, and a bench warrant may be issued for your arrest.
5. If you intend to employ a lawyer, he or she should be notified of the date at once.
6. Fines, costs, and other financial obligations imposed by the court must be paid at the time of assessment.

Court Address 1475 CLEOPHUS PARKWAY
LINCOLN PARK, MI 48146

Court Telephone
(313) 382-9317

Plaintiff ☐ Personal service
JSR FUNDING LLC//

YOU ARE DIRECTED TO APPEAR AT:

☒ The court address above, courtroom _____
☐

V

Defendant ☐ Personal service
VARGAS/SONIA/AND ALL OCCUPANTS
3006 GREEN
LINCOLN PARK, MI 48146

Judge: DAVID J. ZELENAK P-34112

FOR THE FOLLOWING PURPOSE:

DAY DATE TIME
☒ Pre-trial Conf. WED 1/06/16 12:00 PM
TELEPHONE PRETRIAL SCH.

☐ Prelim Exam.

☐ Jury Selection

☐ Jury Trial

☐ Non-Jury Trial

☐ Sentencing

☐ Motion

☐ Arraignment

☐ Informal Hrg.

☐ Formal Hearing

☐

Pltf Atty/People ☐ Personal service
P-78794
DAVID HARRIS APPLEBAUM
2804 ORCHARD LAKE RD
STE 203
KEEGO HARBOR, MI 48320

Defendant's Atty ☐ Personal service
(313) 288-8529 P-74551
TAREK MAHMOUD BAYDOUN
24513 FORD RD
DEARBORN, MI 48128

Officer

☒ The above matter is adjourned from
121615

If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements

Date issued: DEC. 17, 2015

Clerk of the Court

IMPORTANT: READ THIS CAREFULLY

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5. If you intend to employ a lawyer, he or she should be notified of the date at once.
6. Fines, costs, and other financial obligations imposed by the court must be paid at the time of assessment.

Court Address 1475 CLEOPHUS PARKWAY
LINCOLN PARK, MI 48146

Court Telephone
(313) 382-9317

Plaintiff ☐ Personal service
JSR FUNDING LLC//

YOU ARE DIRECTED TO APPEAR AT:

☒ The court address above, courtroom _____
☐

V

Defendant ☐ Personal service
CRUMP/ANTHONY/AND ALL OCCUPANTS
1405 EUCLID
LINCOLN PARK, MI 48146

Judge: DAVID J. ZELENAK E-34112

FOR THE FOLLOWING PURPOSE:

DAY DATE TIME
☒ Pre-trial Conf. WED 1/06/16 12:00 PM
TELEPHONE PRETRIAL SCH.

Pltf Atty/People ☐ Personal service
P-78794
DAVID HARRIS APPLEBAUM
2804 ORCHARD LAKE RD
STE 203
KEEGO HARBOR, MI 48320

☐ Prelim Exam.

☐ Jury Selection

☐ Jury Trial

☐ Non-Jury Trial

Defendant's Atty ☐ Personal service
(313) 288-8529 P-74551
TAREK MAHMOUD BAYDOUN
24513 FORD RD
DEARBORN, MI 48128

☐ Sentencing

☐ Motion

☐ Arraignment

☐ Informal Hrg.

Officer

☐ Formal Hearing

☐

☒ The above matter is adjourned from
121615

If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements

Date issued: DEC. 17, 2015

Clerk of the Court

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5. If you intend to employ a lawyer, he or she should be notified of the date at once.
6. Fines, costs, and other financial obligations imposed by the court must be paid at the time of assessment.

Court Address 1475 CLEOPHUS PARKWAY
LINCOLN PARK, MI 48146

Court Telephone
(313) 382-9317

Plaintiff ☐ Personal service
JSR FUNDING LLC//

YOU ARE DIRECTED TO APPEAR AT:

☒ The court address above, courtroom _____
☐

V

Defendant ☐ Personal service
GUTIERREZ/BRANDY/AND ALL OCCUPANT
934 KINGS HWY
LINCOLN PARK, MI 48146

Judge: DAVID J. ZELENAK P-34112

FOR THE FOLLOWING PURPOSE:

DAY DATE TIME
☒ Pre-trial Conf. WED 1/06/16 12:00 PM
TELEPHONE PRETRIAL SCH.

Pltf Atty/People ☐ Personal service
P-78794

☐ Prelim Exam.

DAVID HARRIS APPLEBAUM
2804 ORCHARD LAKE RD
STE 203
KEEGO HARBOR, MI 48320

☐ Jury Selection

☐ Jury Trial

☐ Non-Jury Trial

Defendant's Atty ☐ Personal service
(313) 288-8529 P-74551
TAREK MAHMOUD BAYDOUN
24513 FORD RD
DEARBORN, MI 48128

☐ Sentencing

☐ Motion

☐ Arraignment

☐ Informal Hrg.

Officer

☐ Formal Hearing

☐

☒ The above matter is adjourned from
121615

If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements

Date issued: DEC. 17, 2015

Clerk of the Court

IMPORTANT: READ THIS CAREFULLY

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5. If you intend to employ a lawyer, he or she should be notified of the date at once.
6. Fines, costs, and other financial obligations imposed by the court must be paid at the time of assessment.

Court Address 1475 CLEOPHUS PARKWAY
LINCOLN PARK, MI 48146

Court Telephone
(313) 382-9317

Plaintiff ☐ Personal service
JSR FUNDING LLC//

YOU ARE DIRECTED TO APPEAR AT:

☒ The court address above, courtroom _____
☐

V

Defendant ☐ Personal service
PADDEN/TIMOTHY/
1814 PAGEL
LINCOLN PARK, MI 48146

Judge: DAVID J. ZELENAK 8-34112

FOR THE FOLLOWING PURPOSE:

DAY DATE TIME
☒ Pre-trial Conf. WED 1/06/16 11:00 PM
TELEPHONE PRETRIAL SCH.

Pltf Atty/People ☐ Personal service
P-78794
DAVID HARRIS APPLEBAUM
2804 ORCHARD LAKE RD
STE 203
KEEGO HARBOR, MI 48320

☐ Prelim Exam.
☐ Jury Selection
☐ Jury Trial
☐ Non-Jury Trial

Defendant's Atty ☐ Personal service
(313) 288-8529 P-74551
TAREK MAHMOUD BAYDOUN
24513 FORD RD
DEARBORN, MI 48128

☐ Sentencing
☐ Motion
☐ Arraignment
☐ Informal Hrg.

Officer

☐ Formal Hearing
☐

☒ The above matter is adjourned from
121615

If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements

Date issued: DEC. 17, 2015

Clerk of the Court

IMPORTANT: READ THIS CAREFULLY

1. Bring this notice with you.
2. No case may be adjourned except by authority of the judge for good cause shown.
3. FAILURE OF THE DEFENDANT TO APPEAR in a civil case may cause a default judgment to be entered. FAILURE OF THE PLAINTIFF TO APPEAR may result in a dismissal of the case.
4. FAILURE TO APPEAR in a criminal case may subject you to the penalty for contempt of court, and a bench warrant may be issued for your arrest.
5. If you intend to employ a lawyer, he or she should be notified of the date at once.
6. Fines, costs, and other financial obligations imposed by the court must be paid at the time of assessment

Court Address 1475 CLEOPHUS PARKWAY
LINCOLN PARK, MI 48146

Court Telephone
(313) 382-9317

Plaintiff ☐ Personal service
JSR FUNDING LLC//

YOU ARE DIRECTED TO APPEAR AT:

☒ The court address above, courtroom__

☐

V

Defendant ☐ Personal service
PADDEN/NICOLE/
1814 PAGEL
LINCOLN PARK, MI 48146

Judge: DAVID J. ZELENAK P-34112

FOR THE FOLLOWING PURPOSE:

DAY DATE TIME
☒ Pre-trial Conf. WED 1/06/16 12:00 PM
TELEPHONE PRETRIAL SCH.

☐ Prelim Exam.

☐ Jury Selection

☐ Jury Trial

☐ Non-Jury Trial

☐ Sentencing

☐ Motion

☐ Arraignment

☐ Informal Hrg.

☐ Formal Hearing

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15-1321

Court telephone no.

COURT ROOM or PLACE	DATE	TIME
TUESDAY	12/29/15	10:30 AM

MC 06 (3/13) NOTICE TO APPEAR

MC 06 (3/13) NOTICE TO APPEAR

Court Address 16077 MICHIGAN AVENUE
DEARBORN, MI 48126

Court Telephone
(313) 943-2060

Plaintiff { } Personal service
CITY OF DEARBORN//

YOU ARE DIRECTED TO APPEAR AT:

{X} The court address above, courtroom 3

{ }

Defendant { } Personal service
HAMMOUD/ZAINAH/
MSC CURRENT OCCUPANT//
6944 THEISEN
DEARBORN, MI 48126

Judge: SAM A. SALAMEY P-38823

FOR THE FOLLOWING PURPOSE:

{ } Pre-trial Conf. DAY DATE TIME

{ } Prelim Exam.

{ } Jury Selection

{ } Jury Trial

{ } Non-Jury Trial

Pltf Atty/People { } Personal service
(313) 943-2035 P-56549
LUCIA A. YANGOUYIAN
16901 MICHIGAN AVE
STE 14
DEARBORN, MI 48126

{ } Sentencing

{ } Motion

{ } Arraignment

{ } Informal Hrg.

{ } Formal Hearing

Defendant's Atty { } Personal service
(313) 288-8529 P-74551
TAREK MAHMOUD BAYDOUN
24513 FORD RD
DEARBORN, MI 48128

{X} HEARING THU 2/18/16 1:00 PM

TERMINATION OF TENANCY

{ } The above matter is adjourned from

Officer

If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements

Date issued: NOV. 30, 2015

Clerk of the Court

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STATE OF MICHIGAN
IN THE 19th DISTRICT COURT

CITY OF DEARBORN,

Plaintiff,

Case No. 15-3923-LT
Hon. Judge Sam Salamey

vs.

SHAEFA MOHAMED OR CURRENT OCCUPANT,

Defendant.

LICIA YANGOUYIAN (P56549)
JEREMY D. BROWN (P76541)
Attorneys for Plaintiff
16901 Michigan Ave., Ste. 14
Dearborn, MI 48126
(313) 943-2035
(313) 943-2469 (Fax)
lyangouy@ci.dearborn.mi.us

THE MERIDIAN LAW GROUP
TAREK M. BAYDOUN (P74551)
Attorneys for Defendant
24513 Ford Rd.
Dearborn, MI 48128
(313) 288-8529
(866) 308-1217 (Fax)
tbaydoun@meridianlawcounselors.com

NOTICE OF HEARING

PLEASE TAKE NOTICE that Defendant's Motion to Set Aside Default Judgment, Possession Judgment and for Stay of Writ of Restitution will be brought on for hearing before the Honorable Sam Salamey on December 28, 2015, at 9:30 a.m., or as soon thereafter as counsel may be heard.

Respectfully submitted,
THE MERIDIAN LAW GROUP

/s/ Tarek M. Baydoun
By: Tarek M. Baydoun (P74551)
Attorneys for Defendant
24513 Ford Rd.
Dearborn, MI 48128
tbaydoun@meridianlawcounselors.com

Dated: December 8, 2015