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TAX FORECLOSURE: A DRAG ON COMMUNITY VITALITY OR A TOOL FOR ECONOMIC GROWTH?

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I. INTRODUCTION

In the summer of 2005, Representative Sally Conway Kilbane introduced House Bill 294 into the Ohio House of Representatives.[1] At that time, her district, which encompasses the City of Cleveland, was battling the abandonment of properties due to a shrinking population and an aging building stock. The bill sought to reform the tax foreclosure system in Ohio to allow for an expedited administrative tax foreclosure process on abandoned, unoccupied properties. The bill passed through the House and Senate and the Governor signed the bill into law in June of 2006.[2] At the time, Representative Kilbane could not have predicted how important such a process would be to Cleveland with the subprime mortgage crisis quickly approaching. Soon after the bill passed, a wave of mortgage foreclosures racked the Cleveland area and much of the nation. As the foreclosure filings rose, so did the number of houses on the market. As market prices dropped, it became less likely that foreclosing lenders would be able to collect on the debt they were owed. Many homes became lost in a legal limbo, with homeowners abandoning the property under foreclosure and the lenders refusing to take title to a home they could not sell and would have to maintain. In the alternative, lenders may have taken title to the property, but sold it quickly, at a loss, to prospecting investors. Frequently those investors proved to be irresponsible and neglectful property owners.

Subsequently, a second revision to the tax foreclosure process allowed for strict foreclosure on unoccupied, abandoned land. This revision became law when SB353 was signed by the Governor in January of 2009.[3] Additionally, upon the bill's passage, Cuyahoga County, the only county in Ohio permitted to do so at the time, was allowed to form what is now known as a county land reutilization

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1. *Ohio Capitol Connection Bill History For HB294*, HANNAH CAPITOL CONNECTION, http://www.rotundacollection.com/BillHistory.aspx?billnum=HB294&ga=5 (last visited June 3, 2013) [hereinafter *Capitol Connection*]. For additional information on Rep. Kilbane, see *Sally Conway Kilbane*, OHIO LADIES' GALLERY http://www.ohioladiesgallery.org/PublicOfficial.aspx?personId=83561 (last visited June 3, 2013).

2. *Capitol Connection*, *supra* note 1.

3. *Bill Status and Legislative Activity*, HANNAH CAPITOL CONNECTION, http://www.rotundacollection.com/viewBill.aspx?billnum=SB353&ga=17 (subscription required) (last visited Dec. 1, 2012).

corporation (CLRC) and use the new tax foreclosure process to its full extent. The final component of the tax foreclosure process came in April of 2010 when the Governor signed HB313 into law.[4] With the passage of this bill, Ohio created a state wide tool for tax enforcement and economic development. Ultimately these bills blended several procedural components, found throughout the United States, and coupled the efficient foreclosure process with a county-wide redevelopment agency committed to minimizing abandonment and blight while concurrently instigating economic development.

In order to better understand the rationale of this tax foreclosure process Part II of this article will explore the history of the property tax, the history of foreclosure, modern trends in tax foreclosure, and the legislative history of the current Ohio statutes. In Part III this article will argue that objective facts show that the former process utilized for tax foreclosure was dysfunctional; that the revisions contain adequate safeguards to protect property owners' rights; and that, though Ohio's solution may be unique, the individual problems and policies behind the legislation are not new and can be found throughout the United States. Part IV of this article will conclude that Ohio has created a safe, effective tool to deal proactively with blight and abandonment and that similar legislation should be adopted throughout the United States.

II. BACKGROUND

A. History of the Property Tax

The property tax has managed to survive for centuries in the face of constant opposition.[5] Described as the horseshoe crab of taxation,[6] it has stubbornly survived as the original empires that created it have crumbled. Though the idea of a property tax has been around for thousands of years,[7] the property tax[8] that we know today in the United States has its roots in the medieval feudal system.[9] Despite frequent

4. *Governor Signs Land Bank Legislation*, HANNAH REPORT (Apr. 7, 2010), http://www.rotundacollection.com/Hannah/NewsStory.aspx?id=182288; OH. REV. CODE ANN. § 323.78 (West 2012).

5. *See* Frank S. Alexander, *Tax Liens, Tax Sales, and Due Process*, 75 IND. L.J. 747, 748 (2000).

6. Dennis Hale, *The Evolution of the Property Tax: A Study of the Relation Between Public Finance and Political Theory*, 47 J. POL. 382, 383 (1985) ("The property tax is the horseshoe crab of revenue devices: primitive, puzzling, but perfectly adapted for survival.").

7. Alexander, *supra* note 5, at 748.

8. The term "property tax" in this article refers to a tax levied upon real property. This article does not address taxes levied upon tangible or intangible personal property.

9. *See* Hale, *supra* note 6, at 386.

criticism, property taxes have become entrenched in our government structure as a vital source of revenue for local governments.[10] This is partially a result of the very nature of levying and collecting property taxes. The administration and collection of property taxes requires a significant commitment of resources to identify properties subject to taxation and determine the value of those properties.[11] This process requires local involvement, and therefore much of the administration and control of property taxes is frequently left to local government. Because of this reliable revenue stream, the operation of many local jurisdictions is dependent upon the revenues generated from property taxes. One study found that in recent decades property taxes have comprised up to seventy-five percent of all tax revenues raised solely by local governments.[12]

Overall, the procedural mechanisms for collecting on unpaid real property taxes vary greatly by jurisdiction.[13] Generally, the process will involve a mix of assessing liens; sale of liens to third parties; judicial or power of sale foreclosure; and liquidation of the property by public sale in order to satisfy the debt owed.[14] The challenges of the collection process are ancient, and even as far back as the Ptolemaic Egyptians and the ancient Greeks governments have been selling their tax debt to third party tax collectors who then handle collection.[15] This process, known as "tax farming,"[16] is an efficient method for those owed taxes to quickly get a discounted return on the debt they are owed, without having to expend resources in the collections process. Unfortunately, this practice may have unintended consequences, including setting the property on a path towards neglect and abandonment.[17] The main alternative to tax farming is for the tax creditor to acquire a lien on the subject property and foreclose on that lien.[18] Originally, when local

10. Alexander, *supra* note 5, at 753.

11. *Id.* at 748.

12. *Id.* at 755 (citing Advisory Comm'n on Intergovernmental Relations, 2 Significant Features of Fiscal Federalism 115 , 118 tbl. 64 (1992)).

13. Alexander, *supra* note 5, at 771. *See also* JENS PETER JENSEN, PROPERTY TAXATION IN THE UNITED STATES 308 (1931) ("It is extremely difficult and precarious to reduce the innumerable details of the collection procedure to either a tabular or a textual statement. Even in a single state . . . where the practice has been adjusted to local whims and needs, some of which have lost their validity, the details defy description.").

14. JENSEN, *supra* note 13, at 326.

15. Alexander, *supra* note 5, at 758.

16. *Id.*

17. *Id.* at 763 ("There is no assurance that the tax lien purchasers themselves, if they ultimately acquire the property at a tax foreclosure, will pay property taxes in subsequent years, or will adequately maintain the property.").

18. Marie T. Reilly, *The Case for the Tax Collector*, 18 J. BANKR. L. & PRAC. 6 ART. 2, § 1 (2009).

governments did not possess the administrative capacity they have today, the collection process was left to the local Sheriff, Treasurer, or a town tax collector who was paid on commission.[19] Some jurisdictions even relied on private third parties to identify who was not paying taxes.[20] Though numerous variations of the tax collection process exist, this article will focus on a common method employed by many jurisdictions. The process involves the assessment on the property of a lien for unpaid property taxes, foreclosure proceedings on the lien, liquidation of the property at public auction, and the final division of proceeds amongst the creditors.[21] Generally, tax liens receive first preference, and as a result, the government receives compensation before any other creditor.[22] This grant of priority is grounded in the simple fact that taxation is crucial to the existence of government.[23]

B. History of Foreclosure on Real Property

Looking at the history of foreclosure helps to better explain the various modern tax lien foreclosure processes. The process of foreclosure first developed in feudal England in relation to mortgages.[24] At that time the primary structure used for mortgages involved a conveyance of the title to the land to the mortgagee upon the condition that the mortgagor would regain title to the property if the mortgagor complied with the terms of the mortgage and repaid the mortgagee on a set date.[25] If the mortgagor could not or did not repay the full amount owed on the date set, then the mortgagor lost all claim to the property and the mortgagee retained title, regardless of the value of the property in comparison to the debt.[26] This inflexible system sometimes led to harsh results, so mortgagors began turning to the courts of equity to regain title.[27] Over several centuries, the courts of equity developed the

19. Alexander, *supra* note 5, at 759.

20. *Id.*; *see also* JENSEN, *supra* note 13, at 353–54 (explaining the practice that developed in Ohio to privatizing tax assessment).

21. Alexander, *supra* note 5, at 772 ("In the overwhelming majority of jurisdictions enforcement of the property tax lien involves a sale of the lien itself, or of the underlying property . . . .").

22. *Id.* at 770 ("Most jurisdictions accord this 'super-priority' status to property tax liens as a matter of statute, though other jurisdictions have reached the same result as a matter of judicial decision."); *see* Randall Thomsen, *Washington State Property Tax Foreclosures: Quoerere Dat Sapere Quoe Sunt Legitima Vere*, 32 GONZ. L. REV. 123, 142 (1996).

23. Alexander, *supra* note 5, at 770.

24. Steven Wechsler, *Through the Looking Glass: Foreclosure By Sale as De Facto Strict Foreclosure—An Empirical Study of Mortgage Foreclosure and Subsequent Resale,* 70 CORNELL L. REV. 850, 855 (1985).

25. *Id.* at 855–56.

26. *Id.* at 856.

27. *Id.*

doctrine known as the equity of redemption, which allowed a defaulting mortgagor a reasonable time to redeem ones property by paying the debt owed.[28] This equitable right of redemption is still prevalent throughout the United States legal system. Originally, all foreclosures were strict foreclosures, where after a foreclosure, the foreclosing party was granted title to the property instead of going through a sale of the property.[29] Strict foreclosure was the primary form of foreclosure in England until the mid-nineteenth century.[30] In the United States, strict foreclosure was largely abandoned in favor of foreclosure by sale.[31] There were several reasons for abandoning strict foreclosure. First, American judges were less likely to grant the equitable remedies which protected mortgagors in England and therefore harsh results from strict foreclosure were more common.[32] Furthermore, prices fluctuated quickly due to rapid growth and strict foreclosure did not match the title theory that was adopted widely in the American colonies.[33] However, strict foreclosure did survive in the United States, partially in mortgage foreclosure law and partially in tax foreclosure law.[34]

C. Modern Tax Foreclosure

Though all states recognize the general process of assessing tax liens,[35] the chosen methods for collection on those liens vary greatly. Each state's collection method is a unique product of its history and culture. One varying factor is the use of the judiciary. According to one commentator, roughly half of the states allow enforcement of tax liens without any judicial involvement.[36] Amongst the other states, the level of judicial involvement varies from full judicial foreclosure[37] to a

28. *Id.*

29. Wechsler, *supra* note 24, at 855–57.

30. *Id.* at 857–58.

31. *Id.* at 858.

32. *Id.*

33. *Id.* The title theory and lien theory dichotomy stems from early mortgage law. The title theory of mortgages was the first to develop, when mortgages required that a mortgagee transfer title in fee simple to the mortgagor. Under this theory the mortgage the mortgagee holds title to the property until the mortgage is satisfied. The lien theory of mortgages, which developed out of the English Courts of Chancery, holds that the mortgagor holds title of the land and the mortgage is solely a lien on the property. Each theory may have different implications for the respective parties rights. LAWRENCE R. AHEARN, III, THE LAW OF DEBTORS AND CREDITORS § 8.2 (2012).

34. For example, Connecticut is a strict mortgage foreclosure jurisdiction. *See* CONN. AGENCIES REGS. § 49-21 (2012). For additional information, see CONN. JUDICIAL BRANCH LAW LIBRARY, FORECLOSURE OF MORTGAGES IN CONNECTICUT (2011), http://www.jud.ct.gov/lawlib/Notebooks/Pathfinders/Foreclosure.PDF.

35. Alexander, *supra* note 5, at 772.

36. *Id.*

37. *See* WASH. REV. CODE. ANN. § 84.64.080 (2012) (requiring a full judicial foreclosure after a

confirmation of the sale at the end of the redemption period.[38]

Generally, a common method for collection of foreclosure on the tax debt follows this path: notice to the property owner of the delinquency and pending sale, sale of either the underlying property or a tax lien certificate, a statutory redemption period where the owner may redeem the property, and finally a foreclosure of the owner's right of redemption.[39] Though a minority practice, strict foreclosure is still prevalent as a method of collection.[40] Some states, as seen in the Ohio statute, have added special provisions to assist in economic development or deal with abandoned and vacant property.[41]

Whatever the policy choices are that lead a state to decide upon a certain method of collection, each method has its own repercussions. For example, if a state allows an extended post-sale right of redemption period then the purchaser has little incentive to spend money on improving the property if the former owner can redeem the property. The purchaser risks losing his or her investment in the property since the former owner will likely be able to redeem for the amount of taxes owed, regardless of the recent investment by the purchaser.

D. History of Current Ohio Statutes

The current tax foreclosure process analyzed in this article was introduced by various Ohio legislators piecemeal over a span of several years. Originally introduced in June 2005, HB294 sought to make the tax foreclosure process more efficient by allowing a county's Board of Revisions to hear tax cases for unoccupied, abandoned property.[42] By allowing these cases to be heard administratively, the foreclosure process could be expedited to take less than half a year, as opposed to the two or three years that such a proceeding could take under the previous law.[43] During the senatorial hearings on the bill, a constant theme championed by proponents of the bill was the negative impact of abandoned buildings on a neighborhood, the inefficiencies of an overburdened judicial system, and the need for a quick and efficient way

long delinquency period).

38. Alexander, *supra* note 5, at 773.

39. *See id.* at 772–73.

40. *Id*. at 772; *see, e.g.*, ALASKA STAT. ANN. § 29.45.390 (2012); ARK. CODE ANN. § 26-37-101 (2012); IDAHO CODE ANN. § 63-1005 (2012); WIS. STAT. ANN. § 75.14 (2012).

41. *See* MASS. GEN. LAWS ANN. ch. 60, § 81A (2012); KAN. STAT. ANN. § 79-2401a(a)(2) (2012) (allowing for a tiered right of redemption with the shortest time period for abandoned properties). *See also* R.I. GEN. LAWS ANN. § 44-9-8.1 (West 2012) (allowing the taking of tax delinquent property "if deemed necessary for redevelopment, revitalization, or municipal purposes").

42. *Capitol Connection*, *supra* note 1.

43. *Id.*

for a jurisdiction to be able to gain control of abandoned properties.[44] Multiple witnesses testified that not only is there an opportunity to mitigate the damage of abandoned properties with the bill, but also a chance to encourage economic development by avoiding the waste of having structures fall into disrepair while waiting for foreclosure; it was argued that instead that equity could be turned around and used as a commodity. Though some legislators raised questions about the system's constitutionality, Richard Cordray, the current director of the Consumer Financial Protection Bureau, asserted that the proposed legislation adequately accounted for all due process concerns.[45]

The second important component of Ohio's foreclosure evolution came with the signing of SB353, which allowed Ohio counties to form county land reutilization corporations (CLRC), also referred to as land banks, and allowed for a strict foreclosure on unoccupied, abandoned properties using the expedited foreclosure process.

The original bill, SB353, only allowed Cuyahoga County, which contains the City of Cleveland, to create a CLRC.[46] The Cuyahoga County Land Reutilization Corporation was meant to be experimental and the legislation included sunset provisions. However due to the positive results achieved in Cleveland, HB313 of the 128th General Assembly repealed the sunset provisions and permitted other counties to create CLRCs.[47]

E. Creation and Operation of a County Land Reutilization Corporation

If a county contains a population greater than sixty thousand, it can elect to form a CLRC.[48] Incorporated as a non-profit community improvement corporation by the county's Treasurer, CLRCs are hybrid creatures overseen by a board of directors comprised mostly of elected officials but incorporated as separate from the county governments as quasi-public, quasi-private entities.[49] Incorporating CLRCs as separate legal entities allows them more freedom to contract for services, purchase, and disposition, while not opening up the government to the liability that comes with dealing with and holding vacant, abandoned properties.[50] The purpose of a CLRC is to facilitate the reclamation,

44. *See id.*

45. *Id.*

46. *Land Bank Expansion Draws Numerous Proponents*, HANNAH REPORT (Dec. 2, 2009), http://www.rotundacollection.com/Hannah/NewsStory.aspx?id=181236.

47. *Id.*

48. OHIO REV. CODE ANN. § 1724.04 (West 2012).

49. *Id.* §§ 1724.01, 1724.04. For a full list of the statutorily-mandated composition of a CLRC's board of directors, see OHIO REV. CODE ANN. § 1724.03(B) (West 2012).

50. Thomas J. Fitzpatrick IV, *Understanding Ohio's Land Bank Legislation*, FED. RESERVE

rehabilitation, and reutilization of vacant, abandoned, tax-foreclosed, or other real property within the county; efficiently hold and manage vacant, abandoned, or tax-foreclosed real property pending its reclamation, rehabilitation, and reutilization; assist governmental entities and other nonprofit or for-profit persons to assemble, clean, and clear the title of property described in this division in a coordinated manner; or promote economic and housing development in the county or region.[51]

A CLRC has a blend of unique and normal corporate powers. As an independent nonprofit corporation, a CLRC has all the regular powers of a corporation.[52] These normal powers include the ability to negotiate financing for projects, contract for services, and dispose of property in a manner deemed best for the community.[53] The freedom to dispose of properties below the fair market value allows a CLRC the freedom to negotiate with purchasers in nonfinancial terms. For example, a CLRC can discount a property below the fair market value in order to secure the commitment from a developer to include low-income housing in a planned development or beautification of the streetscape.

One of the unique powers of a CLRC is the ability to enter into an agency agreement with municipalities and townships where the CLRC will act as the jurisdiction's agent in regards to code enforcement.[54] Due to budget constraints and political repercussions, at times jurisdictions do not have the ability to quickly and strategically fund utilization of their police powers in order to stabilize a particular neighborhood or building. This agency ability allows a CLRC to strategically utilize its own funds to step into the shoes of the local jurisdiction and be proactive about addressing problem properties, ensuring that a singular problem property does not destabilize the property values of an entire street.

The most revolutionary power granted to CLRCs is the ability to foreclose on "unoccupied" property on which a county holds a tax lien.[55]

BANK OF CLEVELAND (2009), *available at* http://www.clevelandfed.org/Research/PolicyDis/pdp25.pdf.

51. OHIO REV. CODE ANN. § 1724.01(B)(2) (West 2012).

52. *Id.* § 1724.02.

53. *Id.*

54. OHIO REV. CODE ANN. § 1724.02(J) (West 2012).

55. *Id.* § 323.66(G)(1).

> "Unoccupied," with respect to a parcel of abandoned land, means any of the following:
>
> (a) No building, structure, land, or other improvement that is subject to taxation and that is located on the parcel is physically inhabited as a dwelling;
>
> (b) No trade or business is actively being conducted on the parcel by the owner, a tenant, or another party occupying the parcel pursuant to a lease or other legal authority, or in a building, structure, or other improvement that is subject to taxation and that is located on the parcel;
>
> (c) The parcel is uninhabited and there are no signs that it is undergoing a change in

Through HB313 and its predecessor HB294, Ohio formed a unique blend of an efficient tax foreclosure process coupled with an organization that is removed from many cumbersome bureaucratic restraints and wholly committed to utilizing the new process to protect communities and spur economic development. Found in Oh. Rev. Code § 323.65 to § 323.79, this process is an expedited, administrative, strict foreclosure.

The expedited and administrative aspects of the foreclosure process share the same rationale. Among other things, as a result of an overloaded court system and the numerous local agencies involved in a tax foreclosure, using the judicial process took too long. HB313 sponsor, Representative Roland Winburn, stressed the importance of the expedited foreclosure process and how even the administrative process implemented in HB294 sometimes took months before a land bank could gain control.[56]

The administrative foreclosure process involves a hearing in front of the county board of revision,[57] a body generally utilized to hear complaints about the taxable value of property.[58] Under the statute, a

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> tenancy and remains legally habitable, or that it is undergoing improvements, as indicated by an application for a building permit or other facts indicating that the parcel is experiencing ongoing improvements;
>
> (d) In the case of delinquent vacant land, there is no permanent structure or improvement affixed on the land.
>
> (2) For purposes of division (G)(1) of this section, it is prima-facie evidence and a rebuttable presumption that may be rebutted to the county board of revision that abandoned land is unoccupied if, at the time the county auditor makes the certification under section 5721.011 of the Revised Code, the abandoned land is not agricultural land, and two or more of the following apply:
>
> (a) At the time of the inspection of the abandoned land by a county, municipal corporation, or township in which the abandoned land is located, no person, trade, or business inhabits, or is visibly present from an exterior inspection of, the abandoned land.
>
> (b) No utility connections, including, but not limited to, water, sewer, natural gas, or electric connections, service the abandoned land, or no such utility connections are actively being billed by any utility provider regarding the abandoned land.
>
> (c) The abandoned land is boarded up or otherwise sealed because, immediately prior to being boarded up or sealed, it was deemed by a political subdivision pursuant to its municipal, county, state, or federal authority to be open, vacant, or vandalized.

OH. REV. CODE ANN. § 323.65(G) (West 2012).

56. Ronald Winburn, Representative, Senate Ways and Means And Economic Development Committee: Sponsor Testimony-House Bill 313 (Feb. 17, 2010), *available at* http://www.rotundacollection.com/ShowDocument.aspx?TestimonyID=413 ("The majority of expedited HB 294 foreclosures were required to go through at least one auction before they could be transferred. Thus, properties acquired by passive land banks sometimes sat vacant for up to nine months after foreclosure and before being transferred to the program, allowing plenty of time for such properties to fall into disrepair or to be stripped by looters.").

57. OHIO REV. CODE ANN. § 323.66 (West 2012).

58. *Id.* § 5715.

CLRC or a tax lien certificate holder could possibly utilize the administrative process.[59] This could potentially include entities that purchase tax liens from the county; however, strict foreclosure under this process is not available to private third-party tax lien certificate holders.[60] The hearing process is very similar to a judicial foreclosure. The foreclosure begins with a title search to identify all persons holding an interest in the property subject to foreclosure.[61] The foreclosing party files a complaint with the local clerk of courts,[62] who then serves all interest holders with the notice and complaint in the same method employed for judicial proceedings.[63] No sooner than thirty days after the perfection of service, a board of revision will have a final hearing on the merits of the complaint.[64] The owner or any other interest holder may only plead that the impositions shown in the complaint have been paid in full, the amount is invalid, service was insufficient, or the land is not abandoned.[65] Property foreclosed under this process can be disposed of by sale or through direct transfer without sale.[66]

A CLRC can seek strict foreclosure, in either a judicial or administrative foreclosure proceeding, through two methods. For abandoned property where the taxes and other associated debts exceed the fair market value, as determined by the county auditor, a CLRC is able to request, after a foreclosure judgment, direct transfer of the property without sale.[67] Additionally, in any foreclosure proceeding against abandoned lands, in a county in which a CLRC operates, the county treasurer or the treasurer's agent in the proceeding may elect to invoke the alternative right of redemption.[68] In an Ohio foreclosure-by-sale proceeding, a property owner's right of redemption continues until a court confirms the sale of the property.[69] When the county treasurer elects to invoke the alternative right of redemption, the property owner, or lienholder,[70] will have forty-five days from the journalization of foreclosure to redeem his or her property by paying the taxes owed to

59. *Id.* § 323.66(A) .

60. *Id.* § 323.78.

61. *Id.* § 323.68.

62. *Id.* § 323.69(A).

63. *Id.* § 323.69(B).

64. *Id.* § 323.70(A).

65. *Id.* § 323.72(A)(1).

66. *Id.* § 323.73.

67. *Id.* § 323.28(E).The same process is made available in OHIO REV. CODE ANN. § 323.71 (West 2009).

68. *Id.* § 323.78.

69. *Id.* § 2329.33.

70. Any lienholder on the property has the ability to pay the tax debt to protect its interest. OHIO REV. CODE ANN. § 323.45 (West 2011).

the county treasurer. After the expiration of the alternative right of redemption period, the property can be transferred free of all encumbrances to a CLRC, a community development organization, a municipal corporation, a county, a township, or a school district.[71]

Strict foreclosure was included in order to ensure that land banks could acquire both positive and negative equity properties and because frequently the sale process adds months to the foreclosure process.[72] Furthermore, Attorney General Nancy Rogers supported the bill as a way to channel the potential profits of selling tax foreclosed properties into an organization committed to the well being of the community.[73] These profits can then be used to fund the operations of the land bank.

III. DISCUSSION

A. The Current System's Importance, Shortfalls, and Effects

The ability to efficiently and effectively collect property taxes is crucial to the operation of local government, making up roughly twenty-nine percent of all general revenues.[74] However, one commonly used process, the judicial foreclosure by sale, has significant flaws that could be harming communities.

As previously mentioned, due to the nature of the assessment and collection of a property tax, these revenues comprise approximately seventy-five percent of all revenues raised solely by local jurisdictions.[75] At a time where state governments are cutting local government funding,[76] property tax revenues become increasingly vital to the functioning of our most basic units of government. Additionally, property tax revenues largely fund our public education system,

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71. *Id.* § 323.78(B).

72. Senator Patton testified that "the change will allow the LRC to acquire both positive and negative equity properties, and the abandoned positive equity properties will be used to help fund the operations of the LRC through responsible resales to qualified homeowners and eligible rehabbers." *Capitol Connection Bill History for SB353 127th General Assembly*, HANNAH CAPITOL CONNECTION (Dec. 2, 2008), http://www.rotundacollection.com/BillHistory.aspx?billnum=SB353&ga=17.

73. "Enabling the creation of Land Reutilization Corporations (LRC) as an alternative, whose primary interest is improving the neighborhoods, to obtain control of some of these properties will allow any proceeds from these transactions to go to the LRC and not those intent on exploitation." *Capitol Connection Bill History For SB353 127th General Assembly*, HANNAH CAPITOL CONNECTION (Dec. 4, 2008), http://www.rotundacollection.com/BillHistory.aspx?billnum=SB353&ga=17.

74. Alexander, *supra* note 5, at 775 n.30 ("Between 1979 and 1990, this percentage remained constant between 28.0% and 29.5%.").

75. *Id.* at 755.

76. *See* Joane Huist Smith, *Local Budgets to Lose Millions in Funding*, DAYTON DAILY NEWS (Aug. 30, 2011), http://www.daytondailynews.com/news/news/local/local-budgets-to-lose-millions-in-funding/nMtkM/; *see also* Courtney Cutright, *Local Schools Wonder About State Budget Cuts*, ROANOKE TIMES (Jan. 8, 2009), http://www.roanoke.com/news/roanoke/wb/190338.

reportedly comprising ninety-seven percent of the revenues that school districts receive.[77] The Supreme Court has long recognized the unique importance of the tax collection process to local and state governments. In *Dows v. City of Chicago*, the Court stated:

> It is upon taxation that the several States chiefly rely to obtain the means to carry on their respective governments, and it is of the utmost importance to all of them that the modes adopted to enforce the taxes levied should be interfered with as little as possible. Any delay in the proceedings of the officers, upon whom the duty is devolved of collecting the taxes, may derange the operations of government, and thereby cause serious detriment to the public.[78]

Just as important as efficient collection is the preservation of property values in order to ensure that the revenues do not decline. Vacant properties can have a devastating effect on the property values of adjacent properties. One study in Philadelphia reported that property values within 150 feet of a vacant building decrease by an average $7,627.[79] As property values decline, the risk of further abandonment and tax delinquency increases, further injuring the revenues of the local jurisdiction.[80]

Currently the primary system of property tax enforcement employed in Ohio, judicial foreclosure, is not only ineffective, but it is enabling a cycle of delinquency and abandonment. This cycle leads to declining property values and significant government expenditures, such as demolition costs.

The following statistics are discerned from an analysis of the tax foreclosure process in Hamilton County, Ohio during 2011.[81] The analysis took account of all properties that went to the Hamilton County Sheriff's sale during 2011, as reported in the Cincinnati Court Index.[82]

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77. Alexander, *supra* note 5, at 775.

78. Dows v. City of Chicago, 78 U.S. 108, 110 (1870).

79. RESEARCH FOR DEMOCRACY, BLIGHT FREE PHILADELPHIA (2001), *available at* http://astro.temple.edu/~ashlay/blight.pdf.

80. Alexander, *supra* note 5, at 756–57.

81. The data underlying these numbers can be seen in Attachment A. The data was discerned from the records of the Cincinnati Court Index and the Hamilton County Auditor. By looking at the reported Sheriff Sale results properties were recorded as receiving a bid or no bid. If a property received a bid, the amount was recorded and the individual property was researched for information about subsequent transfers. All properties that were not bid upon were reported by the foreclosure case number. This process does not take into account properties that were withdrawn from the foreclosure process before reaching sale. The next step was an analysis off the 2011 forfeited auction results. In Hamilton County, the forfeited land sale is conducted in June of every year, so this particular auction did not include all the property reported on from the 2011 Sheriff's sale. Every parcel that was sold at the 2011 forfeited land sale was recorded with the total costs and taxes owed and compared with the purchase price at auction. Then each individual parcel was researched for recent transfers and recent tax payments.

82. The Cincinnati Court Index publishes all the legal notices required by statute for the sale of

A total of 428 properties were offered for auction.[83] Eighty-one properties reportedly received bids, but on only 73 properties were the taxes paid and a successful transfer resulted.[84] Therefore, the total tax debt was collected on only 17.06% of the properties foreclosed upon and offered for sale.[85]

Under Ohio law, after a tax foreclosure a property must be offered at auction twice. If it does not sell at the second auction, it is forfeited to the state.[86] In short, this means that the parcel will sit, free from further assessment of taxes,[87] until the county auditor offers it for sale at another public auction.[88] In Hamilton County, this auction is held annually in June.[89] At the auction, the properties must first be offered at either the fair market value or the total amount owed.[90] In practice, the properties are offered for the amount of the court's finding in a foreclosure proceeding. If the property does not receive a bid, the property is offered for "the best price obtainable."[91] In Hamilton County, the minimum bid for the second round starts at $5.00.[92] In 2011, 780 properties were offered for auction at the Forfeited Land Sale.[93] 225 properties received bids.[94] The total debt owed on the properties purchased, including the full amount of the foreclosure findings and the court costs, was $1.73 million dollars.[95] The total collected was $226,810.00.[96] The full debt owed was collected on only four properties.[97] On many of the properties, the winning bid did not cover the court costs, let alone the tax debt.[98] The $1.5 million dollar deficit is wiped from the tax records of the properties. Even more startling is the fact that of the 225 properties purchased, 143 (63.5%) were already

real property at a public auction. *See* CINCINNATI COURT INDEX, http://www.courtindex.com/ (last visited June 3, 2013).

83. *See infra* Table 1.

84. *Id.*

85. *Id.*

86. OHIO REV. CODE ANN. § 5723.01(A)(1) (West 2012).

87. *Id.* § 5723.02.

88. *Id.* § 5723.06.

89. HAMILTON CNTY. AUDITOR, http://www.hamiltoncountyauditor.org/tax_delinquent.asp (last visited June 3, 2013).

90. OHIO REV. CODE ANN. §§ 5723.06(A)(1), 5721.16(A) (West 2012).

91. *Id.* § 5723.06(A)(2).

92. *See infra* Table 4.

93. *See infra* Table 3.

94. *Id.*

95. *Id.*

96. *Id.*

97. *See infra* Table 4.

98. *See Id.*

delinquent again by the next year.[99] This suggests that the people purchasing land at auctions are not responsible property owners.

Hamilton County suffers multiple losses in revenue from this process. For example, one loss is the amount of the tax debt that is uncollected. Additional losses include the future revenues not collected from the irresponsible purchasers, and the loss of tax revenue not collected as the forfeited property waited for auction. Though a precise number may be hard to determine since there is a high correlation between tax delinquency and abandonment,[100] the negative impact on property values throughout Hamilton County is likely to be substantial. This reduction leads to diminishing overall revenues.

As evidence of the cyclical nature of the problem, an analysis of properties sold in the 2006 Forfeited Land Sale show that 46.9% of the properties then sold are currently delinquent, many showing no property taxes having been paid for the past several years.[101] Furthermore, some of the properties sold in 2006 have already been foreclosed upon again and resold at a subsequent Forfeited Land Sale.[102] Therefore, another loss to the County is the judicial, prosecutorial, and administrative resources that go into a foreclosure proceeding.

Hamilton County is not the only jurisdiction plagued with this inefficiency. One study performed in St. Paul, Minnesota found that 83% of what is owed is not collected in foreclosure.[103] This number is very close to the 86% that went uncollected in the Hamilton County 2011 Forfeited Land Sale. Part of this ineffectiveness stems from the public auction mechanism itself. In the most common type of auction employed for the sale of foreclosed property, generally, "[b]idders physically congregate in a single location. They call their bids orally, so that each bidder is immediately aware of the bids of others. Bids move progressively upward. An individual may bid multiple times, and the sale is awarded to the highest bidder."[104] The auction itself is a quick process and only taking a few moments. For foreclosure auctions conducted by private lenders this is seen as beneficial because it minimizes carrying costs, but the small benefits of the auction system are greatly outweighed by the inefficiencies.

First, all interested persons must be physically present on the day of

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99. *Id.*

100. Frank S. Alexander, *Property Tax Foreclosure Reform: A Tale of Two Stories*, GA. BR. J., Dec. 1995, at 10, 11.

101. *See infra* Table 5.

102. *See infra* Table 6.

103. Edward G. Goetz, Kristin Cooper, Bret Thiele, & Hin Kin Lam, *Pay Now or Pay More Later: St.Paul's Experience in Rehabilitating Vacant Housing*, CURA REPORTER, Apr. 1998, at 15.

104. Grant S. Nelson & Dale A. Whitman, *Reforming Foreclosure: The Uniform Nonjudicial Foreclosure Act*, 53 DUKE L.J. 1399, 1416 (2004).

the auction.[105] In a normal sale of real property, the pool of potential buyers is much larger because interested parties can inquire at their leisure.[106] Additionally, it is difficult to obtain financing for a purchase at auction because there is no time for individual negotiation or thorough due diligence.[107] This further limits the pool of potential purchasers.

Furthermore, auctions generally require a deposit from the successful bidder immediately subsequent the sale; plus, full payment of the purchase price within a short amount of time.[108] For example, at a Hamilton County Sheriff's Sale for tax foreclosed properties the successful bidder must write a personal check for the full amount immediately after the auction and return with a cashier's check for the full payment by the end of the day. This practice forces potential bidders to prearrange a method of payment even if ultimately unsuccessful at the auction.[109] This eliminates most amateurs or one-time-only purchasers from the auction.[110]

Another factor that reduces the potential purchase price and the quality of purchaser is that usually there is no way for an interested party to view and assess a property.[111] Therefore, bidders are forced to build in "worst-case estimates" of what it will cost to make the property useable.[112] Most transactions involving the transfer of real property include a thorough inspection to determine the value of the property and any expected expenses that may be necessary after acquisition. The risk associated with purchasing a property without an inspection turns away many potential buyers.[113] As stated by one commentator:

> It is essential that buyers have adequate information about the property being sold if market price is to be achieved. Sellers who use commercial auction sales recognize this fact, and generally provide very extensive disclosures of information, termed "bid packages," to prospective bidders. Such packages may include engineering and architectural reports on the buildings and their systems, detailed plans and surveys, environmental audits, and the like. This information encourages higher bids because it tends to reduce the level of uncertainty that bidders experience.[114]

105. *Id.* at 1417.
106. *Id.*
107. *Id.* at 1419.
108. *Id.* at 1419–20.
109. *Id.* at 1420.
110. *Id.*
111. *Id.* at 1421.
112. *Id.* at 1420.
113. *Id.* at 1422.
114. *Id.* at 1421.

Lack of access and certainty affects the title of the property as well. Most buyers will want to know if there are any encumbrances on the property, but this will require the purchase of a title report before the auction. Additionally, few title agencies will issue title insurance on the deed granted to a purchaser in a tax foreclosure auction. Therefore, frequently a purchaser must undertake a quiet-title action in order to attain title insurance.

In essence, the pool of potential buyers is boiled down to a very small number of professionals. At the vast majority of mortgage foreclosure auctions, the lender is present and simply credit bids what it is owed and acquires title to the property.[115] However, at tax foreclosure auctions there is generally no lender or lienholder present and often the pool of potential purchasers is solely comprised of prospectors.[116]

The Ohio statutory revisions (collectively the Ohio Land Banking Statute) remedy many of the issues that are present if a foreclosed property is sold at public auction.

First, by allowing a CLRC to take possession of properties much of the risk that is built into the auction system can be eliminated. Once a CLRC has title to the property, the property can be properly assessed and inspected. Prospective purchasers can perform their due diligence on the property and obtain financing if necessary. This allows CLRCs to encourage more than just savvy prospectors to purchase tax-foreclosed homes. Instead, it is possible to encourage purchasers who will be owner-occupants to buy the once abandoned properties, rehab them, and begin stitching the fabric of the street or neighborhood back together.

Second, a CLRC can include claw-back provisions in its agreements to transfer property that require a property owner to maintain the property and pay property taxes. This is an important measure not available with the public auction system because it works to remove the problem property from a cycle of abandonment and neglect, putting it on a path to rehabilitation and use.

Finally, with the combination of an efficient tax foreclosure system and an aggressive land bank the negative effects of tax delinquent and abandoned properties can be strategically utilized as a means to encourage economic development. Allowing a land bank to gain control of properties quickly through the tax foreclosure process preserves the equity still left in the structures and allows the land bank to channel that equity into channels that will benefit the community. This may mean

115. *Id.* at 1423.

116. In an interview with Sgt. Snow, the police officer in charge of foreclosure sales in Hamilton County, Ohio, he referred to these buyers as "his regulars" and even mentioned that they will "gang-up" on first-time auction attendees to dissuade them from returning.

assisting an organization committed to low-income housing, like Habitat for Humanity; allowing a young couple to purchase their first home, or to encourage a for-profit developer to undertake a development that will create jobs.

B. Statutory Safeguards

Though an expedited strict, administrative foreclosure may sound harsh, there are adequate safeguards in place to address the most significant policy concerns. The statute is deftly crafted to reach only properties that pose serious problems to communities and have minimal reason for protection. One common law safeguard that has its roots in England, is the property owner's right of redemption.[117] As referenced earlier, this right was created out of equity to blunt the harshness of the original mortgage system, which required conveyance of the fee to the mortgagee and accepted no excuses for late payment.[118] Under the Ohio tax foreclosure process, a property owner still maintains his right of redemption. The majority of the redemption period comes before the foreclosure process. A property must be delinquent on property taxes for almost one full year before a foreclosure can begin.[119] The right of redemption continues until either a sale at public auction is confirmed by the court, a foreclosure judgment is journalized against a property with a tax debt higher than the assessed value, or the 45-day alternative right of redemption period expires after a judgment of foreclosure. Therefore, the shortest possible redemption period would consist of the year the taxes are owed, but not paid; a period allowing for the County Auditor to compile a list of delinquent properties; ample time to perform a title search and other foreclosure preparations; and thirty days after proper service in the foreclosure case.[120]

Furthermore, property owners are protected because many have the right to enter into a delinquent tax contract, in essence a payment plan, at any time before an adjudication of foreclosure.[121] Any person who owns agricultural property or owns and resides in residential property, that is the subject to tax foreclosure, is entitled to at least one opportunity to enter into a delinquent tax contract.[122] This contract is not supposed to exceed five years;[123] however, for agricultural and

117. Wechsler, *supra* note 24, at 856.
118. *Id.* at 855–56.
119. OHIO REV. CODE ANN. § 5721.10 (West 2012).
120. *Id.* § 5721.10.
121. *Id.* § 323.31.
122. *Id.* § 323.31(A)(1).
123. *Id.* § 323.31(A)(4).

owner-occupied residential property a county treasurer may even allow subsequent tax contracts.[124] This same protection is not guaranteed for residential property that the owner does not occupy or for commercial property.[125] If the property owner defaults on the payment plan, then the delinquent taxes can be foreclosed upon.[126]

However, even the tax-contract safeguard is not entirely necessary because the strict, administrative foreclosure process is only available for properties that are unoccupied or abandoned.[127] This eliminates the policy concern surrounding evicting people out of their home through this process. If someone legally occupies the home, and this is not restricted solely to the owner, then a foreclosure proceeding can only be performed in the judicial foreclosure by sale method.

Additionally, there are procedural safeguards to remove cases inappropriate for the administrative foreclosure process. For example, the record owner of the land or the United States government may opt-out of the administrative foreclosure process simply by filing a motion with the county clerk requesting dismissal.[128] The board must then dismiss the complaint and any future attempts at tax collection, until the owner sells or conveys his or her interest, must be pursued through the judicial foreclosure process.[129] Furthermore, if the board of revisions determines that a case is too complex, the board may dismiss the case sua sponte.[130]

Finally, there are adequate opportunities to appeal decisions of the administrative body hearing the foreclosure. Any party to a administrative foreclosure proceeding has fourteen days after the termination of the right of redemption to file an appeal with the county court of common pleas.[131] These appeals are de novo and new issues may be raised on appeal.[132]

C. Administrative Foreclosure Processes Are Not New

The policy concerns behind the adoption of the Ohio land banking statute are not new and have been recognized elsewhere, leading to the creation of similar processes. For example, the federal government has

124. *Id.* § 323.31(A)(1).
125. *Id.* § 323.31(A)(2).
126. *Id.* §§ 323.31(A)(6)–(7).
127. *Id.* § 323.66.
128. .*Id.* § 323.70(B).
129. *Id.*
130. *Id.* § 323.69(D).
131. *Id.* § 323.79.
132. *Id.*

recognized many of the problems with judicial foreclosure and as a result has provided United States Department of Housing and Urban Development (HUD) with an alternative foreclosure process. First provided in The Multifamily Mortgage Foreclosure Act of 1981, HUD was empowered to perform nonjudicial foreclosures, a simple process comprised of notice of default then a sale of the property, on properties on which it holds mortgages and preempt state statutory redemption protections. The congressional findings promulgated in support of the legislation include: the concern that lengthy foreclosure processes lead to the degradation of the property, which in turn negatively impacts the surrounding community and quality of life of residents; furthermore, congress notes the overburdened court systems as an important factor to justify the procedure.[133]

The Uniform Commercial Code, the (UCC), has long recognized the issues with holding rigid to antiquated, lengthy foreclosure processes and sales. As a result, the UCC does not dictate the exact manner of disposition for goods, but instead calls for a "commercially reasonable sale."[134] The purpose of this flexibility is to attain a price that adequately reflects the fair market value.[135] Furthermore, the UCC also allows, with the consent of the debtor, acceptance of the collateral by the lender in full or partial satisfaction of the debt.[136] With the possibility

133. 12 U.S.C.A. § 3701 (West 2012):

(a) The Congress finds that—

(1) . . . .

(2) long periods to complete the foreclosure of these mortgages under certain State laws lead to deterioration in the condition of the properties involved; necessitate substantial Federal management and holding expenditures; increase the risk of vandalism, fire loss, depreciation, damage, and waste with respect to the properties; and adversely affect the residents of the projects and the neighborhoods in which the properties are located;

(3) these conditions seriously impair the Secretary's ability to protect the Federal financial interest in the affected properties and frustrate attainment of the objectives of the underlying Federal program authorities, as well as the national housing goal of "a decent home and a suitable living environment for every American family";

(4) application of State redemption periods to these mortgages following their foreclosure would impair the salability of the properties involved and discourage their rehabilitation and improvement, thereby compounding the problems referred to in clause (3);

(5) the availability of a uniform and more expeditious procedure for the foreclosure of these mortgages by the Secretary and continuation of the practice of not applying postsale redemption periods to such mortgages will tend to ameliorate these conditions; and

(6) providing the Secretary with a nonjudicial foreclosure procedure will reduce unnecessary litigation by removing many foreclosures from the courts where they contribute to overcrowded calendars.

134. U.C.C. § 9-610 (2012).

135. *Id.* § 9-610, Cmt. 2.

136. *Id.* § 9-620.

that, in certain situations, this consent may be implied, the effect is essentially a nonjudicial, strict foreclosure.[137]

Finally, many states already have tax foreclosure processes utilizing the same components found in the Ohio land bank law. One example is Rhode Island. Rhode Island provides what is in essence a strict foreclosure.[138] The statute provides that a municipality or a municipality's development agency may "take" tax-delinquent property that it determines is necessary for redevelopment, revitalization, or municipal purposes.[139] These properties are subject to the statutory right of redemption, but if the property is abandoned the municipality may immediately file to foreclose the owner's right of redemption.[140] Though this process is similar to the Ohio process, there are several significant differences that should be noted. A majority of the process is undertaken by the municipality itself, utilizing different departments. This type of inter-department dependency generally adds bureaucratic hurdles to the process. Additionally, the Ohio statute creates what are essentially county-wide redevelopment agencies, allowing the single CLRC's operations to incorporate both the traditional inner city and usually the surrounding suburbs. This breadth lends itself to more efficient operations and a better ability to organize systematic economic development and land reutilization.

Connecticut provides an example of an expedited strict, limited-judicial procedure for properties where the taxes are greater then the value of the property.[141] The validity of the municipality's claim is presumed and there are no pleadings, but instead a four month window allowed for anyone entitled to redeem to present a "bona fide defense."[142] If the property is not redeemed the title vests in the municipality, which is later free to retain the proceeds of any sale.[143]

Iowa contains a procedure that completely omits the judiciary, but instead relies on a power of sale type foreclosure followed by an extended statutory right of redemption period.[144] In short, the elements of nonjudicial or administrative strict foreclosures are scattered throughout the legal systems of the various states and the federal government.

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137. *Id.* § 9-620(c)(2).

138. R.I. GEN. LAWS ANN. § 44-9-8.1 (2012).

139. *Id.*

140. *Id.* § 44-9-25.2.

141. CON. AGENCIES REGS §§ 12-182 (2012).

142. *Id.* §§ 12-183, 12-188.

143. *Id.* §§ 12-189, 12-195.

144. IOWA CODE ANN. §§ 446.7, 447.9 (2012).

IV. CONCLUSION

With the passage of HB294 and HB313, the State of Ohio has created an exciting and powerful tool to enforce the payment of property taxes, to stabilize the property values of communities affected by vacant and abandoned homes, and to generate economic development opportunities.

The data shows that the former system was broken and fed a cycle of decline, blight, and frequently demolition. The resulting waste and degradation to homes was a loss to neighborhoods. The resulting diminution in property values and property tax revenues was and continues to be a loss, even a major threat, to the functioning of local governments.

The method adopted by Ohio provides adequate due process safeguards and adequately addresses the policy concerns rooted in protection of property rights and a person's home. These concerns are addressed by adequate notice, an opportunity to be heard, and specific statutory safeguards targeted at removing occupied, residential structures from the foreclosure process.

By providing Ohio counties with a strict, administrative foreclosure process and a non-profit development agency to orchestrate the reutilization of vacant, abandoned, and blighted property, the Ohio legislatures have not created anything completely new. But instead, they have utilized the procedural pieces found all over the United States and formed them into a unique product. A product that will no doubt change the face of many Ohio cities in a very positive way.

To borrow an analogy used by Justice Barndeis,[145] Ohio is acting as a laboratory and the experiment is well underway. Other states should look to Ohio's efforts, learn from the successes and possible shortfalls, and employ similar legislation in an effort to improve their tax foreclosure systems and communities.

145. New State Ice Co. v. Leibman, 285 U.S. 262, 311 (1932).

EXHIBITS

Table 1 – 2011 Sheriff Sale Results

Total Number of Properties that Went to Auction	Received Bid	No Bid
428	81	347
Percentage Receiving No Bids:	81.07%	
Taxes actually recovered on:	17.06%	

Table 2 – Data

Date	Case Name	Parcel ID	Sold Amount	Date Re-Sold	Amount	Auction/Resale Difference
6-Jan-11						
Properties Sold	A-1004721	595-0010-0065-00	14,200.00			0.00
	A-1004955	036-0001-0242-00	4,801.76			0.00
	A-0906278	224-0006-0109-00	4,454.51			0.00
No Bids	A-0908552 A-0906213 A-1004958 A-1003152 A-1005781 A-0910417 A-1006136 A-1004726 A-1002282 A-0904311 A-0906277				0.00	
					0.00	
					0.00	
13-Jan-11						
Properties Sold						
No Bids	A-1005795 A-1001670 A-1003161 A-1002392 A-1000113 A-1004953 A-0909339 A-1002021 A-1000388 A-1002543 A-1002164 A-1003157 A-1002395 A-1001668 A-1003488 A-1000048 A-1006137 A-1002041 A-1006200 A-1006205 A-0910172 A-1001688 A-1002534 A-1001730 A-1003495 A-0910857		0.00			
			0.00			
			0.00			
			0.00			
			0.00			
					0.00	

					0.00	
					0.00	
					0.00	
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					0.00	
					0.00	
					0.00	
					0.00	
					0.00	
					0.00	
					0.00	
20-Jan-11	A-1003486					0.00
	A-1001859					0.00
	A-1005783					0.00
	A-1006711					0.00
	A-1001924					0.00
	A-0909395					0.00
	A-1001863					0.00
	A-1006802					0.00
	A-1004395					0.00
	A-1001872					0.00
	A-1001886					0.00
	A-1000389					0.00
	A-1001867					0.00
	A-1006769					0.00
	A-1002725					0.00
	A-1001211					0.00
	A-1005876					0.00
	A-1006770					0.00
3-Feb-11	A-0901321	651-0049-0209-00	83,000.00	June, 2011	62,000.00	21,000.00
	A-0910398	122-0003-0068-00	47,000.00	Sept, 2011	64,000.00	-17,000.00
	A-1007388	602-0002-0320-00	19,000.00	Aug, 2011	23,000.00	-4,000.00
	A-1005200	561-0002-0031-00	10,743.01	May, 2011	25,000.00	-14,256.99
10-Feb-11	A-1003819					0.00
	A-1002289					0.00
	A-1001868					0.00
	A-1001862					0.00
	A-1006748					0.00
	A-1001698					0.00
	A-1006800					0.00
	A-1006467					0.00
	A-1001866					0.00
	A-1001873					0.00
	A-1005001					0.00
	A-1003489					0.00
	A-1003492					0.00
	A-1005952					0.00
	A-1006768					0.00
	A-1002533					0.00
24-Feb-11		A-1003487	52,100.00			0.00
		A-1006517	65,000.00			0.00
		A-1007721	30,100.00			0.00
		A-1006516	32,000.00			0.00
		A-1006526	60,100.00			0.00
		A-1007704	9,072.14			0.00
		A-1001686	8,675.32			0.00
		A-1005977	8,000.00			0.00
10-Mar-11	A-1002540					0.00
	A-0908025					0.00
	A-0909401					0.00
	A-1005980					0.00
	A-1005611					0.00
	A-1006493					0.00
	A-1000589					0.00

	A-1001923					0.00
	A-1001864					0.00
	A-1008004					0.00
	A-1000788					0.00
	A-1006683					0.00
	A-1002287					0.00
	A-1006083					0.00
	A-1007818					0.00
	A-1007705					0.00
	A-1006677					0.00
	A-1007736					0.00
	A-1007825					0.00
	A-0908565					0.00
	A-1006082					0.00
	A-1005604					0.00
	A-0911555					0.00
	A-1003451					0.00
24-Mar-11		202-0032-0146-00	73,000.00			0.00
		046-0A04-0103-00	34,523.05			0.00
		057-0005-0156-00	12,391.70			0.00
		215-0069-0112-00	5,765.25			0.00
7-Apr-11	A-1004435					0.00
	A-1001697					0.00
	A-1002919					0.00
	A-1002721					0.00
	A-1001930					0.00
	A-1008695					0.00
	A-1006492					0.00
	A-1004345					0.00
	A-1005880					0.00
	A-1004723					0.00
	A-1003296					0.00
	A-1002918					0.00
	A-1007737					0.00
	A-1006745					0.00
	A-1003155					0.00
	A-1002057					0.00
	A-1002055					0.00
	A-1001869					0.00
	A-1002052					0.00
	A-1005003					0.00
	A-1006201					0.00
	A-1006147					0.00
	A-1007738					0.00
	A-0904311					0.00
14-Apr-11		117-0005-0213-00	29,533.55	Sept, 2011	40,000.00	-10,466.45
		208-0B57-0018-00	45,000.00			0.00
		530-0040-0142-00	15,228.41			0.00
		591-0008-0134-00	13,500.00			0.00
		527-0010-0100-00	14,703.38			0.00
		598-0030-0083-00	12,700.00			0.00
		510-0041-0295-00	35,000.00			0.00
		205-0024-0077-00	7,241.37			0.00
		195-0028-0195-00	6,373.47			0.00
		510-0031-0303-00	14,000.00			0.00
5-May-11		500-0213-0188-00	31,000.00			0.00
		590-0372-0087-00	15,811.12	Dec, 2011	$180,000.00	-164,188.88
12-May-11		069-0003-0120-00	16,631.02			0.00
		241-0001-0208-00	7,680.08			0.00
19-May-11	A-1005092	590-0413-0089-00	$100,000.00			0.00
	A-1009536					0.00
	A-1001865					0.00
	A-1005005					0.00
	A-1009537					0.00
	A-1000961					0.00
	A-1006494					0.00
	A-1005975					0.00
	A-1004339					0.00
	A-1006878					0.00
	A-1002059					0.00
	A-1005947					0.00
	A-1004398					0.00
	A-1005808					0.00
	A-1005807					0.00
	A-1008964					0.00
	A-1005601					0.00

26-May-11	A-0907283	582-0014-0424-00	12,961.35			0.00
	A-1006488					0.00
	A-1008810					0.00
	A-1007703					0.00
	A-1009404					0.00
	A-1009702					0.00
	A-1005946					0.00
	A-1003291					0.00
	A-1001884					0.00
	A-0906588					0.00
	A-0906590					0.00
	A-0906211					0.00
	A-1006141					0.00
	A-1009451					0.00
	A-0906584					0.00
	A-0906585					0.00
	A-1007819					0.00
2-Jun-11	A-1001932	156-0055-0079-00	412,585.67			0.00
	A-1001927	550-0252-0027-00	32,823.37			0.00
	A-1008617	582-0008-0169-00	16,481.44	Jan, 2012	19,200.00	-2,718.56
	A-1006736	598-0061-0036-00	50,000.00			0.00
	A-1006602	064-0001-0229-00	14,100.00			0.00
	A-1008698					0.00
	A-1009701					0.00
	A-1009602					0.00
	A-1009552					0.00
	A-1010333					0.00
	A-1009912					0.00
	A-1009794					0.00
	A-1003447					0.00
	A-1004999					0.00
	A-1005599					0.00
	A-1005609					0.00
	A-1005881					0.00
	A-1005942					0.00
	A-1006142					0.00
	A-1006496					0.00
	A-1006732					0.00
9-Jun-11	A-1002033					0.00
	A-1006212					0.00
	A-1001858					0.00
	A-1006744					0.00
	A-1004394					0.00
	A-1011562					0.00
	A-1005095					0.00
	A-1006733					0.00
	A-1006526					0.00
	A-1008692					0.00
	A-1005004					0.00
	A-1009644					0.00
	A-1005603					0.00
	A-1100150					0.00
	A-1005779					0.00
	A-1009056					0.00
	A-1007822					0.00
16-Jun-11	A-1006734					0.00
	A-1009392					0.00
	A-1006594					0.00
	A-1001731					0.00
	A-1005930					0.00
	A-1005090					0.00
	A-1005600					0.00
	A-1008614					0.00
	A-1001565					0.00
	A-1001923					0.00
	A-1007741					0.00
	A-1006718					0.00
	A-1005796					0.00
	A-1006199					0.00
	A-1006798					0.00
	A-1007740					0.00
	A-1100536					0.00
	A-1005931					0.00
	A-1011608					0.00
	A-1007823					0.00
	A-1010338					0.00

	A-1011664					0.00
	A-1006737					0.00
	A-1100473					0.00
	A-1008993					0.00
	A-1008015					0.00
	A-1008705					0.00
	A-1100526					0.00
	A-1100784					0.00
	A-1100542					0.00
	A-1100527					0.00
	A-1011546					0.00
	A-1009459					0.00
	A-1006206					0.00
23-Jun-11		248-0003-0034-00	65,000.00			0.00
		094-0006-0063-00	3,972.99			0.00
7-Jul-11	A-1006774	149-0014-0033-00	10,076.14			0.00
	A-1007817	590-0392-0014-00	14,340.00			0.00
	A-1005943	114-0001-0028-00	19,000.00			0.00
	A-1007743	062-0001-0098-00	6,634.45			0.00
	A-1006715	035-0005-0035-00	3,580.22			0.00
	A-1008152					0.00
	A-1009909					0.00
	A-1009407					0.00
	A-1007723					0.00
	A-1008403					0.00
	A-1009558					0.00
	A-1005606					0.00
	A-1100790					0.00
	A-1009655					0.00
	A-1007816					0.00
21-Jul-11	A-1006743					0.00
	A-1006804					0.00
	A-1005882					0.00
	A-1009461					0.00
	A-1008694					0.00
	A-1008704					0.00
	A-1005094					0.00
	A-1006762					0.00
	A-1006599					0.00
	A-1101710					0.00
	A-1011613					0.00
	A-1007042					0.00
	A-1007742					0.00
	A-1101356					0.00
18-Aug-11		119-0002-0368-00	12,481.44			0.00
		595-0012-0177-00	2,095.35			0.00
		235-0003-0069-00	5,000.00			0.00
		174-0009-0131-00	6,600.00	Feb, 2012	$18,000.00	-11,400.00
9-Sep-11		612-0140-0248-00	40,000.00	Sep, 2012	$90,000.00	-50,000.00
		219-0054-0025-00	7,518.20	June, 2012	$13,000.00	-5,481.80
		603-0A23-0057-00	35,702.29	Aug, 2012	$300,000.00	-264,297.71
		530-0040-0018-00	7,215.20			0.00
22-Sep-11	A-1001882	243-0004-0056-00	11,100.00	Oct, 2012	$51,600.00	-40,500.00
	A-1005797					0.00
	A-1100733					0.00
	A-1011536					0.00
	A-1100549					0.00
	A-1006207					0.00
	A-1009566					0.00
	A-9893851					0.00
	A-1011548					0.00
	A-1100281					0.00
	A-1100283					0.00
	A-1006597					0.00
	A-1011606					0.00
	A-1009651					0.00
	A-1010337					0.00
6-Oct-11	A-1102577	236-0002-0171-00	9,000.00			0.00
	A-1101227	128-0001-0143-00	21,000.00	June, 2012	$115,000.00	-94,000.00
	A-1101677	233-0003-0117-00	15,000.00	Sep, 2012	$10,000.00	5,000.00
	A-1101680	115-0003-0109-00	14,000.00			0.00
	A-1101736	520-0172-0348-00	27,100.00			0.00
	A-1101809	134-0005-0064-00	22,961.67			0.00
	A-1102750					0.00

	A-1100469					0.00
	A-1103108					0.00
	A-1103107					0.00
	A-1106191					0.00
	A-1006601					0.00
	A-1006729					0.00
	A-1006811					0.00
	A-1008003					0.00
	A-1008957					0.00
	A-1008958					0.00
	A-1009557					0.00
	A-1009649					0.00
	A-1011607					0.00
	A-1100551					0.00
	A-1100709					0.00
	A-1103025					0.00
	A-1102890					0.00
	A-1004340					0.00
	A-1103758					0.00
20-Oct-11	A-1102889	065-0003-0013-00	5,532.07			0.00
	A-1101578	057-0003-0114-00	5,064.25			0.00
	A-1101542	641-0005-0055-00	13,100.00			0.00
	A-1100531	204-0014-0104-00	7,979.55			0.00
	A-1011561	590-0320-0624-00	4,943.57			0.00
	A-1006521	500-0041-0245-00	17,444.77			0.00
	A-1008758	630-0130-0084-00	30,500.00			0.00
3-Nov-11	A-1103757	115-0004-0112-00	29,394.36	June, 2012	$40,000.00	-10,605.64
	A-1103244					0.00
	A-1102391					0.00
	A-1101708					0.00
	A-1101581					0.00
	A-1101231					0.00
	A-1009704					0.00
	A-1006717					0.00
	A-1006675					0.00
8-Dec-11		608-0020-0044-00	50,000.00			0.00
15-Dec-11		520-0271-0058-00	20,000.00			0.00
		500-0171-0051-00	3,496.78			0.00
		671-0001-0055-00	25,500.00			0.00
22-Dec-11	A-1009911					0.00
	A-1102191					0.00
	A-1008990					0.00
	A-1104867					0.00
	A-1103493					0.00
	A-1007754					0.00
	A-1100553					0.00
	A-1101678					0.00
	A-1103646					0.00
	A-1102613					0.00
	A-1104621					0.00
	A-1101684					0.00
	A-1101739					0.00
	A-1007720					0.00
	A-1009711					0.00
	A-1100729					0.00
29-Dec-11	A-1008959	175-0016-0027-00	4,924.49			0.00
	A-1101529	125-0003-0077-00	91,000.00			0.00
	A-1100470	128-0003-0015-00	16,477.70			0.00
	A-1008622	211-0067-0088-00	23,000.00			0.00
	A-1100789	117-0A07-0430-00	24,300.00			0.00
	A-1101815	590-0392-0243-00	12,400.00			0.00
	A-1002922	510-0360-0508-00	9,201.72			0.00
	A-1104579					0.00
	A-1100471					0.00
	A-1100528					0.00
	A-1100698					0.00
	A-1102887					0.00
	A-1006809					0.00

Table 3 – 2011 Forfeited Land Sale Results

Total Costs/Taxes Owed	1,733,384.19
Total Monies Collected	226,810.00
Total Gain/Loss	1,506,574.19
Total Number Sold:	225
Number Delinquent By the Next Year:	143
Percentage Delinquent the Next Year:	63.56%

Table 4 – Data for Table 2

Parcel Number	Court Costs/Taxes	Price Sold at Auction	Gain/Loss	Price	Value Difference	Date Resold	Comments
024-0003-0124-00	$10,348.59	$75.00	$10,273.59	$2,500.00	-$2,425.00	2/10/12	
029-0002-0050-00	$9,510.64	$5.00	$9,505.64		$0.00		
031-0005-0070-00	$6,821.39	$5.00	$6,816.39	$7,500.00	-$7,495.00	6/20/12	
031-0005-0071-00	$2,357.03	$5.00	$2,352.03	$7,500.00	-$7,495.00	6/20/12	
034-0002-0038-00	$9,011.77	$2,000.00	$7,011.77		$0.00		
034-0005-0071-00	$3,490.61	$5.00	$3,485.61		$0.00		
035-0002-0020-00	$7,695.44	$9,000.00	$1,304.56		$0.00		
035-0002-0101-00	$10,354.18	$27,000.00	$16,645.82		$0.00		
035-0003-0091-00	$46,853.66	$5.00	$46,848.66	$50.00	-$45.00	6/22/12	No taxes paid since transfer.
035-0004-0127-00	$21,651.93	$21,000.00	$651.93		$0.00		
036-0004-0169-00	$12,609.00	$5.00	$12,604.00	$5,000.00	-$4,995.00	10/17/11	
037-0003-0065-00	$4,981.52	$5.00	$4,976.52		$0.00		No taxes paid since transfer.
037-0003-0067-00	$2,567.26	$5.00	$2,562.26		$0.00		
037-0003-0090-00	$10,531.48	$5,300.00	$5,231.48		$0.00		
037-0003-0422-00	$18,542.59	$5.00	$18,537.59		$0.00		No taxes paid since transfer.
054-0004-0067-00	$4,165.15	$5.00	$4,160.15		$0.00		No taxes paid since transfer.
054-0004-0074-00	$3,142.58	$5.00	$3,137.58		$0.00		No taxes paid since transfer.
054-0004-0144-00	$13,172.57	$5,000.00	$8,172.57		$0.00		No taxes paid since transfer.
054-0004-0171-00	$14,970.61	$1,000.00	$13,970.61		$0.00		No taxes paid since transfer.
054-0005-0156-00	$18,528.47	$1,450.00	$17,078.47		$0.00		
055-0004-	$12,841.21	$200.00	$12,641.21		$0.00		No taxes

0004-00							paid since transfer.
055-0004-0020-00	$15,411.62	$2,750.00	$12,661.62	$6,000.00	-$3,250.00	8/24/12	
057-0003-0081-00	$9,056.36	$7,050.00	$2,006.36		$0.00		
057-0003-0089-00	$5,802.06	$4,800.00	$1,002.06	$10,000.00	-$5,200.00	1/6/12	
057-0003-0099-00	$11,783.13	$7,500.00	$4,283.13		$0.00		No taxes paid since transfer.
058-0002-0126-00	$15,238.43	$1,100.00	$14,138.43	$100.00	$1,000.00	6/22/12	No taxes paid since transfer.
058-0003-0039-00	$8,974.80	$1,200.00	$7,774.80		$0.00		No taxes paid since transfer.
058-0004-0017-00	$20,018.32	$700.00	$19,318.32		$0.00		No taxes paid since transfer.
058-0004-0026-00	$4,522.86	$805.00	$3,717.86	$8,500.00	-$7,695.00	8/9/12	
058-0005-0010-00	$5,643.94	$650.00	$4,993.94		$0.00		Delinquent again.
058-0006-0019-00	$5,839.29	$600.00	$5,239.29		$0.00		No taxes paid since transfer.
060-0004-0061-00	$1,139.66	$750.00	$389.66		$0.00		Delinquent again.
060-0004-0088-00	$1,107.58	$200.00	$907.58		$0.00		
060-0004-0099-00	$1,246.72	$650.00	$596.72		$0.00		Delinquent again.
060-0004-0122-00	$1,270.95	$5.00	$1,265.95		$0.00		Delinquent again.
060-0004-0151-00	$1,187.07	$5.00	$1,182.07		$0.00		Delinquent again.
065-0001-0027-00	$23,120.83	$3,000.00	$20,120.83		$0.00		Delinquent again.
068-0001-0275-00	$5,711.35	$100.00	$5,611.35		$0.00		
068-0002-0266-00	$4,142.57	$5.00	$4,137.57		$0.00		
068-0003-0032-00	$2,065.36	$5.00	$2,060.36		$0.00		No taxes paid since transfer.
068-0003-0066-00	$5,922.98	$1,560.00	$4,362.98		$0.00		
069-0002-0087-00	$8,123.71	$610.00	$7,513.71	$5,000.00	-$4,390.00	10/12/11	No taxes paid since transfer.
070-0002-0133-00	$1,875.84	$5.00	$1,870.84		$0.00		
072-0002-0004-00	$1,298.36	$200.00	$1,098.36	$5,000.00	-$4,800.00	11/4/11	Delinquent again.
072-0002-0006-00	$1,312.06	$550.00	$762.06	$5,000.00	-$4,450.00	11/4/11	Delinquent again.
088-0009-0062-00	$1,484.73	$5.00	$1,479.73		$0.00		No taxes paid since transfer.
090-0001-0048-00	$5,352.66	$5,000.00	$352.66		$0.00		
092-0004-0155-00	$17,598.28	$5.00	$17,593.28	$5,000.00	-$4,995.00	9/7/11	
093-0002-0124-00	$14,651.45	$800.00	$13,851.45		$0.00		No taxes paid since transfer.
094-0004-0101-00	$6,618.09	$100.00	$6,518.09		$0.00		
094-0005-0097-00	$3,585.99	$25.00	$3,560.99		$0.00		
094-0005-0113-00	$3,474.27	$200.00	$3,274.27		$0.00		No taxes paid since transfer.
094-0005-0132-00	$4,171.75	$900.00	$3,271.75	$1,000.00	-$100.00	8/19/11	
094-0005-0133-00	$4,888.29	$300.00	$4,588.29	$1,000.00	-$700.00	8/19/11	
094-0005-0149-00	$4,297.78	$705.00	$3,592.78		$0.00		No taxes paid since

							transfer.
094-0005-0294-00	$3,245.91	$5.00	$3,240.91		$0.00		No taxes paid since transfer.
094-0006-0072-00	$1,559.16	$100.00	$1,459.16	$7,000.00	-$6,900.00	8/17/12	No taxes paid since transfer.
094-0006-0259-00	$11,785.75	$600.00	$11,185.75	$7,000.00	-$6,400.00	8/17/12	No taxes paid since transfer.
094-0007-0249-00	$7,433.69	$1,250.00	$6,183.69		$0.00		
094-0008-0043-00	$4,120.73	$575.00	$3,545.73	$10,000.00	-$9,425.00	3/1/12	
095-0002-0052-00	$4,724.91	$405.00	$4,319.91		$0.00		No taxes paid since transfer.
095-0003-0060-00	$26,501.10	$5.00	$26,496.10	$22,950.00	-$22,945.00	6/29/12	Delinquent again.
095-0004-0095-00	$1,970.37	$5.00	$1,965.37		$0.00		
095-0004-0109-00	$7,598.56	$5.00	$7,593.56		$0.00		
095-0004-0113-00	$1,721.36	$5.00	$1,716.36		$0.00		
095-0004-0118-00	$1,753.77	$5.00	$1,748.77		$0.00		
095-0004-0118-00	$7,392.31	$405.00	$6,987.31		$0.00		
096-0003-0108-00	$3,380.31	$5.00	$3,375.31		$0.00		Delinquent again.
096-0004-0114-00	$25,458.80	$155.00	$25,303.80		$0.00		No taxes paid since transfer.
096-0004-0130-00	$1,144.46	$180.00	$964.46		$0.00		No taxes paid since transfer.
096-0004-0131-00	$43,966.08	$5.00	$43,961.08		$0.00		No taxes paid since transfer.
098-0002-0043-00	$3,924.21	$5.00	$3,919.21		$0.00		Delinquent again.
100-0002-0351-00	$8,413.54	$2,500.00	$5,913.54		$0.00		
105-0003-0017-00	$10,232.17	$2,500.00	$7,732.17	$2,500.00	$0.00	12/12/11	Delinquent again.
106-0003-0115-00	$14,931.59	$5.00	$14,926.59	$1,000.00	-$995.00	8/24/11	Delinquent again.
107-0007-0022-00	$13,745.26	$5.00	$13,740.26	$15,680.00	-$15,675.00	8/30/11	No taxes paid since transfer.
108-0007-0011-00	$5,739.40	$5.00	$5,734.40		$0.00		No taxes paid since transfer.
113-0002-0006-00	$42,912.26	$700.00	$42,212.26		$0.00		No taxes paid since transfer.
117-0010-0007-00	$48,171.06	$4,100.00	$44,071.06	$8,100.00	-$4,000.00	8/25/11	No taxes paid since transfer.
117-0015-0267-00	$86,422.97	$15,100.00	$71,322.97		$0.00		
131-0006-0238-00	$16,889.86	$1,500.00	$15,389.86	$5,000.00	-$3,500.00	11/8/11	
132-0002-0150-90	$41,813.11	$5.00	$41,808.11		$0.00		
132-0003-0028-00	$16,623.92	$250.00	$16,373.92		$0.00		No taxes paid since transfer.
132-0003-0039-00	$2,182.46	$5.00	$2,177.46		$0.00		
132-0003-0234-00	$9,097.75	$1,800.00	$7,297.75		$0.00		No taxes paid since transfer.
149-0011-0216-00	$1,911.66	$5.00	$1,906.66	$9,440.00	-$9,435.00	5/8/12	No taxes paid since transfer.
149-0013-0045-00	$1,855.80	$5.00	$1,850.80	$9,440.00	-$9,435.00	5/8/12	
155-0047-	$2,135.28	$5.00	$2,130.28		$0.00		No taxes

0073-00							paid since transfer.
157-0060-0046-00	$9,999.41	$50.00	$9,949.41		$0.00		
158-0061-0013-00	$1,563.45	$5.00	$1,558.45		$0.00		
158-0061-0111-00	$1,987.66	$5.00	$1,982.66		$0.00		No taxes paid since transfer.
158-0062-0046-00	$2,881.01	$5.00	$2,876.01		$0.00		Delinquent again.
159-0064-0016-00	$1,463.08	$5.00	$1,458.08		$0.00		
159-0064-0063-00	$7,381.21	$5.00	$7,376.21		$0.00		No taxes paid since transfer.
161-0003-0017-00	$7,158.51	$400.00	$6,758.51		$0.00		
161-0003-0020-00	$3,119.42	$200.00	$2,919.42		$0.00		
163-0004-0002-00	$1,128.21	$5.00	$1,123.21		$0.00		No taxes paid since transfer.
163-0004-0020-00	$1,894.55	$5.00	$1,889.55	$17,230.00	-$17,225.00	7/10/12	No taxes paid since transfer.
163-0004-0061-00	$16,480.61	$5.00	$16,475.61	$17,230.00	-$17,225.00	7/10/12	Delinquent again.
163-0004-0124-00	$1,066.25	$5.00	$1,061.25		$0.00		No taxes paid since transfer.
164-0001-0002-00	$2,336.15	$5.00	$2,331.15	$17,230.00	-$17,225.00	7/10/12	No taxes paid since transfer.
164-0001-0039-00	$2,179.69	$5.00	$2,174.69	$17,230.00	-$17,225.00	7/10/12	No taxes paid since transfer.
164-0001-0198-00	$1,674.80	$5.00	$1,669.80	$17,230.00	-$17,225.00	7/10/12	No taxes paid since transfer.
169-0004-0062-00	$1,843.94	$5.00	$1,838.94	$17,230.00	-$17,225.00	7/10/12	Delinquent again.
170-0009-0173-00	$11,672.73	$5.00	$11,667.73		$0.00		
171-0012-0001-00	$2,317.44	$200.00	$2,117.44		$0.00		No taxes paid since transfer.
171-0012-0002-00	$1,325.71	$5.00	$1,320.71		$0.00		No taxes paid since transfer.
171-0012-0004-00	$1,356.31	$5.00	$1,351.31		$0.00		No taxes paid since transfer.
171-0012-0005-00	$1,346.31	$5.00	$1,341.31		$0.00		No taxes paid since transfer.
171-0012-0007-00	$1,407.41	$5.00	$1,402.41		$0.00		No taxes paid since transfer.
171-0012-0010-00	$1,399.41	$5.00	$1,394.41		$0.00		No taxes paid since transfer.
171-0012-0066-00	$1,117.58	$5.00	$1,112.58		$0.00		No taxes paid since transfer.
171-0012-0090-00	$1,390.14	$5.00	$1,385.14		$0.00		No taxes paid since transfer.
171-0012-0105-00	$1,649.90	$5.00	$1,644.90		$0.00		No taxes paid since transfer.
171-0012-0109-00	$2,572.31	$200.00	$2,372.31		$0.00		No taxes paid since transfer.
171-0012-0110-00	$1,653.10	$5.00	$1,648.10		$0.00		No taxes paid since transfer.
171-0012-0116-00	$1,331.54	$5.00	$1,326.54		$0.00		No taxes paid since transfer.

171-0012-0124-00	$1,321.44	$5.00	$1,316.44		$0.00		No taxes paid since transfer.
171-0012-0145-00	$2,079.83	$200.00	$1,879.83		$0.00		No taxes paid since transfer.
171-0012-0148-00	$1,659.69	$5.00	$1,654.69		$0.00		No taxes paid since transfer.
171-0012-0156-00	$1,302.42	$5.00	$1,297.42		$0.00		No taxes paid since transfer.
171-0012-0160-00	$1,330.42	$5.00	$1,325.42		$0.00		No taxes paid since transfer.
173-0001-0167-00	$10,358.66	$200.00	$10,158.66	$2,500.00	-$2,300.00	2/10/12	No taxes paid since transfer.
173-0002-0147-00	$1,113.30	$5.00	$1,108.30		$0.00		No taxes paid since transfer.
174-0008-0175-00	$1,123.60	$5.00	$1,118.60	$22,950.00	-$22,945.00	6/29/12	No taxes paid since transfer.
174-0008-0179-00	$2,115.04	$5.00	$2,110.04	$22,950.00	-$22,945.00	6/29/12	No taxes paid since transfer.
174-0009-0039-00	$3,846.69	$5.00	$3,841.69		$0.00		
175-0013-0072-00	$1,159.63	$5.00	$1,154.63		$0.00		No taxes paid since transfer.
175-0016-0130-00	$10,804.97	$1,900.00	$8,904.97		$0.00		
175-0016-0155-00	$1,500.39	$5.00	$1,495.39	$2,800.00	-$2,795.00	3/9/12	
175-0018-0189-00	$12,975.63	$600.00	$12,375.63		$0.00		No taxes paid since transfer.
176-0019-0101-00	$3,155.14	$5.00	$3,150.14	$7,940.00	-$7,935.00	8/29/12	Delinquent again.
177-0035-0060-00	$15,739.90	$2,305.00	$13,434.90		$0.00		
177-0037-0081-00	$15,149.75	$1,005.00	$14,144.75		$0.00		No taxes paid since transfer.
178-0025-0096-00	$14,450.74	$125.00	$14,325.74	$5,000.00	-$4,875.00	4/6/12	Delinquent again.
179-0074-0092-00	$8,346.59	$5.00	$8,341.59		$0.00		Delinquent again.
179-0078-0285-00	$14,397.45	$2,250.00	$12,147.45		$0.00		
184-0003-0101-00	$12,062.58	$600.00	$11,462.58		$0.00		No taxes paid since transfer.
184-0005-0092-00	$1,733.50	$125.00	$1,608.50	$100.00	$25.00	9/13/12	
184-0005-0154-00	$5,937.51	$5.00	$5,932.51	$3,000.00	-$2,995.00	9/18/12	
187-0008-0019-00	$8,250.94	$400.00	$7,850.94		$0.00		No taxes paid since transfer.
187-0008-0023-00	$13,707.58	$1,230.00	$12,477.58		$0.00		
192-0065-0049-00	$9,406.80	$1,800.00	$7,606.80	$3,900.00	-$2,100.00	12/14/11	No taxes paid since transfer.
193-0005-0067-00	$8,187.11	$105.00	$8,082.11	$2,980.00	-$2,875.00	8/24/12	
194-0009-0180-00	$1,712.25	$5.00	$1,707.25		$0.00		
194-0009-0181-00	$1,678.25	$5.00	$1,673.25		$0.00		
194-0009-0183-00	$1,883.88	$75.00	$1,808.88		$0.00		
194-0009-0200-00	$616.95	$5.00	$611.95		$0.00		
194-0010-0094-00	$1,857.73	$5.00	$1,852.73	$1,090.00	-$1,085.00	2/28/12	No taxes paid since transfer.

194-0011-0113-00	$16,593.62	$2,000.00	$14,593.62	$62,830.00	-$60,830.00	8/18/11	No taxes paid since transfer.
195-0028-0246-00	$6,329.84	$5.00	$6,324.84		$0.00		No taxes paid since transfer.
195-0028-0249-00	$10,230.97	$5.00	$10,225.97		$0.00		No taxes paid since transfer.
195-0031-0192-00	$626.44	$5.00	$621.44		$0.00		
195-0032-0055-00	$9,869.38	$5.00	$9,864.38		$0.00		
200-0A48-0004-00	$9,028.24	$600.00	$8,428.24		$0.00		No taxes paid since transfer.
201-0038-0089-00	$7,570.33	$5.00	$7,565.33		$0.00		No taxes paid since transfer.
201-0038-0121-00	$5,090.51	$3,900.00	$1,190.51		$0.00		No taxes paid since transfer.
201-0039-0289-00	$1,547.58	$5.00	$1,542.58	$33,450.00	-$33,445.00	6/1/12	No taxes paid since transfer.
201-0039-0290-00	$3,756.13	$5.00	$3,751.13	$33,450.00	-$33,445.00	6/1/12	No taxes paid since transfer.
201-0039-0338-00	$5,365.09	$5.00	$5,360.09		$0.00		No taxes paid since transfer.
201-0039-0360-00	$3,449.79	$5.00	$3,444.79		$0.00		
202-0032-0027-00	$2,474.44	$5.00	$2,469.44		$0.00		No taxes paid since transfer.
202-0032-0033-00	$6,519.34	$65.00	$6,454.34		$0.00		No taxes paid since transfer.
202-0032-0041-00	$907.01	$5.00	$902.01		$0.00		No taxes paid since transfer.
202-0032-0157-00	$2,223.67	$5.00	$2,218.67		$0.00		No taxes paid since transfer.
202-0032-0181-00	$4,532.74	$5.00	$4,527.74		$0.00		No taxes paid since transfer.
202-0033-0037-00	$1,625.04	$5.00	$1,620.04		$0.00		No taxes paid since transfer.
202-0033-0099-00	$5,340.74	$600.00	$4,740.74	$3,500.00	-$2,900.00	8/6/12	No taxes paid since transfer.
202-0033-0140-00	$1,666.05	$5.00	$1,661.05		$0.00		No taxes paid since transfer.
202-0033-0141-00	$1,670.05	$5.00	$1,665.05		$0.00		No taxes paid since transfer.
202-0042-0063-00	$4,062.68	$5.00	$4,057.68		$0.00		No taxes paid since transfer.
203-0025-0175-00	$2,537.83	$5.00	$2,532.83		$0.00		No taxes paid since transfer.
203-0028-0096-00	$6,627.34	$5.00	$6,622.34		$0.00		No taxes paid since transfer.
203-0028-0204-00	$3,298.50	$5.00	$3,293.50		$0.00		No taxes paid since transfer.
203-0029-0008-00	$1,418.57	$5.00	$1,413.57		$0.00		No taxes paid since transfer.
203-0029-0038-00	$3,532.17	$5.00	$3,527.17		$0.00		No taxes paid since transfer.
203-0030-0022-00	$21,322.88	$5.00	$21,317.88		$0.00		No taxes paid since

							transfer.
204-0A15-0140-00	$2,681.76	$5.00	$2,676.76		$0.00		Delinquent again.
205-0021-0104-00	$1,550.94	$5.00	$1,545.94		$0.00		No taxes paid since transfer.
206-0001-0164-00	$5,932.72	$1,710.00	$4,222.72		$0.00		
206-0008-0064-00	$2,024.08	$5.00	$2,019.08		$0.00		No taxes paid since transfer.
206-0013-0059-00	$12,259.90	$10,700.00	$1,559.90		$0.00		
207-0052-0048-00	$5,734.81	$6,500.00	$765.19		$0.00		
207-0054-0101-00	$10,433.72	$1,800.00	$8,633.72		$0.00		
212-0065-0223-00	$2,302.27	$5.00	$2,297.27		$0.00		No taxes paid since transfer.
216-0039-0060-00	$10,987.01	$5.00	$10,982.01		$0.00		No taxes paid since transfer.
216-0045-0066-00	$9,913.23	$1,800.00	$8,113.23		$0.00		Delinquent again.
216-0048-0014-00	$9,812.34	$5.00	$9,807.34		$0.00		
221-0019-0163-00	$5,167.02	$250.00	$4,917.02	$5,000.00	-$4,750.00	9/24/12	
221-0020-0018-00	$6,628.85	$100.00	$6,528.85	$6,900.00	-$6,800.00	9/2/11	No taxes paid since transfer.
233-0004-0007-00	$8,315.89	$5.00	$8,310.89		$0.00		No taxes paid since transfer.
235-0002-0060-00	$9,732.69	$5.00	$9,727.69		$0.00		No taxes paid since transfer.
571-0003-0075-00	$5,269.73	$5.00	$5,264.73		$0.00		No taxes paid since transfer.
590-0213-0107-00	$16,708.35	$10,000.00	$6,708.35		$0.00		
590-0221-0508-00	$17,099.45	$800.00	$16,299.45		$0.00		
590-0350-0132-00	$3,943.27	$5.00	$3,938.27		$0.00		No taxes paid since transfer.
590-0350-0133-00	$3,942.27	$5.00	$3,937.27		$0.00		No taxes paid since transfer.
590-0350-0165-00	$1,809.28	$5.00	$1,804.28		$0.00		No taxes paid since transfer.
590-0350-0189-00	$1,786.73	$5.00	$1,781.73		$0.00		No taxes paid since transfer.
590-0350-0190-00	$9,966.37	$5.00	$9,961.37		$0.00		No taxes paid since transfer.
590-0350-0191-00	$1,541.81	$5.00	$1,536.81		$0.00		No taxes paid since transfer.
590-0350-0230-00	$3,166.25	$5.00	$3,161.25		$0.00		No taxes paid since transfer.
590-0350-0242-00	$2,250.28	$5.00	$2,245.28		$0.00		No taxes paid since transfer.
590-0350-0342-00	$2,262.25	$5.00	$2,257.25		$0.00		No taxes paid since transfer.
590-0350-0382-00	$11,584.90	$5.00	$11,579.90		$0.00		No taxes paid since transfer.
592-0017-0145-00	$16,730.93	$3,950.00	$12,780.93		$0.00		
592-0022-0141-00	$8,320.32	$5.00	$8,315.32		$0.00		No taxes paid since transfer.

594-0020-0156-00	$5,768.93	$5.00	$5,763.93		$0.00		No taxes paid since transfer.
594-0040-0028-00	$8,844.01	$100.00	$8,744.01	$2,600.00	-$2,500.00	9/9/11	
594-0050-0296-00	$2,199.14	$5.00	$2,194.14		$0.00		
600-0011-1070-00	$9,356.82	$14,000.00	$4,643.18		$0.00		No taxes paid since transfer.
600-0011-1283-00	$681.41	$5.00	$676.41	$390.00	-$385.00	3/12/12	
600-0094-0001-00	$2,978.84	$500.00	$2,478.84		$0.00		
608-0007-0035-00	$29,371.06	$5.00	$29,366.06		$0.00		No taxes paid since transfer.
608-0008-0328-00	$3,584.17	$500.00	$3,084.17		$0.00		
608-0008-0429-00	$2,260.69	$5.00	$2,255.69		$0.00		No taxes paid since transfer.
612-0040-0365-00	$1,580.42	$200.00	$1,380.42		$0.00		
621-0006-0048-00	$5,386.54	$750.00	$4,636.54	$26,880.00	-$26,130.00	11/28/11	Delinquent again.
630-0240-0084-00	$2,901.84	$1,000.00	$1,901.84	$9,900.00	-$8,900.00	9/26/11	Delinquent again.
641-0002-0010-00	$4,748.35	$25.00	$4,723.35		$0.00		
641-0004-0226-00	$1,747.34	$5.00	$1,742.34		$0.00		
651-0020-0044-00	$1,154.00	$5.00	$1,149.00	$22,950.00	-$22,945.00	6/29/12	No taxes paid since transfer.
651-0051-0110-00	$36,126.45	$5.00	$36,121.45		$0.00		
661-0002-0007-00	$6,093.95	$5.00	$6,088.95		$0.00		
661-0002-0269-00	$11,013.25	$3,400.00	$7,613.25		$0.00		No taxes paid since transfer.