VANGUARD VENTURES, LIMITED LIABILITY COMPANY,	*	**IN THE**
	*	**CIRCUIT COURT**
Plaintiff,	*	**FOR**
v.	*	**BALTIMORE CITY**
IRIS E. FORTUNE, *et al.*,	*	
Defendants.	*	**Case № 24-C-24-000218**

* *

JUDGMENT FORECLOSING RIGHT OF REDEMPTION

The submissions in the above captioned case having been read and considered, the Court finds that all Defendants were personally served or were notified in accordance with Maryland Rule 14-503 and §14-839(a) of the Tax-Property Article of the Maryland Code Annotated and also were notified by an Order of Publication issued out of this Honorable Court, that the time limit set in the Order of Publication and in the summons has expired, and that no redemption has been made by any party in interest. Therefore, it is, this 13 day of June, 2024,

ORDERED that judgment be, and it is hereby, entered in favor of Plaintiff foreclosing the right of redemption in the property below described as: 2436 Woodbrook Ave., Lot Size: 14X88-11 (being known as: Ward 13, Section 07, Block 3406, Lot 027 on the Tax Roll of the Director of Finance); and it is further

ORDERED that Plaintiff is vested with an absolute and indefeasible **fee simple** title, free and clear of all alienations and descents of the property occurring before the date of the judgment and encumbrances on the property, except taxes and municipal liens that have accrued after the date of the sale and easements of record and any other easement to which the property is subject that may be observed by an inspection of the property; and it is further

ORDERED that the Director of Finance shall execute and deliver a Deed to the Plaintiff, and Plaintiff's successors and assigns, in accordance with the provisions of §§ 14-831 and 14-847 of the Tax-Property Article of the Maryland Code Annotated; and it is further

ORDERED that the Supervisor of Assessments of Baltimore City shall enroll Plaintiff as the **fee simple** owner of the above-described property.

TRUE COPY
TEST

The Clerk is directed to close the case.
Plaintiff to pay costs.

JUDGE
Circuit Court for Baltimore City

Xavier A. Conaway, Clerk of the Circuit Court

05/28/2024 3:15:43 PM

VANGUARD VENTURES, LIMITED LIABILITY COMPANY	*	IN THE
Plaintiff	*	CIRCUIT COURT
	*	FOR
v.	*	BALTIMORE CITY
IRIS E. FORTUNE, *et al.*	*	CASE NO.: 24-C-24-000218
Defendants		

* * * * * * * * * * * *

2024 MAY -3 AM 10:39

AFFIDAVIT OF COMPLIANCE
2436 Woodbrook Avenue

Plaintiff, by its attorney, Aaron A. Naiman, and the Law Offices Naiman & Naiman, PA, affirms under the penalty of perjury that service of process has been made or attempted on the below listed Defendants. Service of process was made or attempted by delivering to the person to be served a copy of the summons, complaint, and all other papers filed with it, or by mailing to the person to be served a copy of the summons, complaint, and all other papers filed with it by certified mail, return receipt requested. The methods of service are in full compliance with Maryland Rule 2-121(a). This affidavit is submitted so as to be in compliance with Maryland Rule 2-121(c)

(a) **Defendant** Iris E. Fortune (Holder of fee simple interest on subject property) was served as follows: By personal service, by Robin Carter., a private process server, on March 30, 2024, at 6606 Park Heights Ave, Baltimore, MD 21215. The Affidavit of Service is attached as **Exhibit 1.**

(b) **Defendant** State of Maryland S/O Anthony G. Brown, Attorney General, was served as follows: Pursuant to MD Rule 2-124 (j), service was completed by email by Alexis Queen, a private process server, by serving Wendy L. Shiff, Assistant to the Attorney General, on March

29, 2024. The return email receipt from the Office of the Attorney General accepting service is attached as **Exhibit 2.**

(c) Defendant Michael Moiseyev, THE DIRECTOR OF FINANCE OF BALTIMORE CITY was served as follows: By personal service, by Alexis Queen, a private process server, was authorized to deliver the documents to their drop box, on April 11, 2024, at 100 North Holliday Street, Baltimore City. The affidavit of service is attached as **Exhibit 3.**

(d) Defendant MAYOR AND CITY COUNCIL OF BALTIMORE CITY was served as follows: By personal service, by Alexis Queen, a private process server, was authorized to deliver the documents to their drop box, on April 11, 2024, at 100 North Holliday Street, Baltimore City. The affidavit of service is attached as **Exhibit 4.**

(e) Further notice was given to all Defendants by publication of an order of Publication in a newspaper of general circulation in Baltimore city once a week for three consecutive weeks. The Order was mailed first class postage prepaid to all Defendants.

(f) Plaintiff, pursuant to MD Rule 14 – 503 (c), on April 4, 2024, posted a notice in a conspicuous place on the property.

(g) In compliance with the notice provisions of § 14-836(b)(4)(iii)(2) of the Tax-Property Article of Maryland Code Annotated and Md. Rule 14-504, written notice of these proceedings, as prescribed by Md. Rule 14-502(b)(3), together with a copy of the Complaint, was sent to the persons or entities not named as a defendant in this action who possesses a recorded interest, claim, judgment or other lien against the property that is the subject of this action:

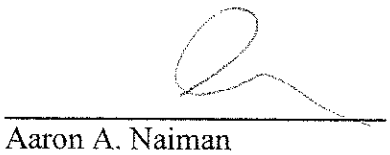
A <u>MD TAX-PROPERTY ARTICLE §14-836(b)(4)(iii) AFFIDAVIT</u> is being filed simultaneously with this pleading.

(h) Pursuant to Maryland Annotated Code, Tax-Property article, 14-836(b)(4)(iv), written notice of the proceeding was sent by first-class mail, postage prepaid, addressed to the tenant by name, if the identity of the tenant is known, or addressed to "Occupant" if the identity of the tenant is known. The envelope in which the notice was sent was prominently marked on the outside with the phrase "Notice of Action to Foreclose"; and a copy of the Complaint was enclosed with the notice. Pursuant to Maryland Annotated Code, Tax-Property article, 14-836 (b)(4)(v), the notice included the following statement in conspicuous, bold –face print: "**IF THE UNPAID TAXES, TOGETHER WITH COSTS AND EXPENSES, ARE NOT PAID, THE COURT MAY ENTER A JUDGMENT FORECLOSING THE RIGHT OF REDEMPTION THAT WOULD TERMINATE YOUR LEASE AND RIGHT TO OCCUPY THE PROPERTY. YOU HAVE THE RIGHT TO PAY THE UNPAID TAXES, TOGETHER WITH COSTS AND EXPENSES, AND AVOID LEASE TERMINATION AND EVICTION. A JUDGMENT FORECLOSING THE RIGHT OF REDEMPTION COULD BE ENTERED WITHIN THE NEXT 90 DAYS AND AT THAT TIME YOU COULD BE EVICTED OR REQUIRED TO VACATE THE PROPERTY." Please see attached as Exhibit 5.**

WHEREFORE, the plaintiff prays that the Court pass an order granting to it a Fee Simple title to 2436 Woodbrook Avenue, **Baltimore City, Maryland** the subject matter of this case.

In accordance with Maryland Rule 1-322.2(a)(1), I certify that the documents in the attached submission do not contain any personal identifier information described in Maryland Rule 1-322.2(b).

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



Aaron A. Naiman
Law Offices Naiman & Naiman, PA
Attorney for the Plaintiff
25 Hooks Lane, Suite 202
Baltimore, MD 21208
(410) 653-6809
aaron@naiman-law.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3 day of ~~April~~ May, 2024, a true copy of the foregoing Affidavit of Compliance was delivered by first class mail to the defendants in this matter.

Iris E. Fortune
6606 Park Heights Ave
Baltimore, MD 21215

State of Maryland
S/O Anthony G. Brown, Attorney General
200 St. Paul Place
Baltimore, MD 21202

City of Baltimore
S/O Michael Moiseyev
Director of Finance
100 N. Holiday Street
Room 454
Baltimore, MD 21202

The Mayor and City Council
Of Baltimore City
S/O Ebony Thompson
100 N. Holiday Street
Baltimore, MD 21202

Aaron A. Naiman
Law Offices Naiman & Naiman, PA
Attorney for the Plaintiff
25 Hooks Lane, Suite 202
Baltimore, MD 21208
(410) 653-6809
aaron@naiman-law.com

VANGUARD VENTURES, LIMITED LIABILITY COMPANY	*	IN THE
Plaintiff	*	CIRCUIT COURT
	*	FOR
v.		
	*	BALTIMORE CITY
IRIS E. FORTUNE, *et al.*		
	*	CASE NO.: 24-C-24-000218
Defendants		

* * * * * * * * * * * * *

JUDGMENT FORECLOSING RIGHT OF REDEMPTION

The Proceedings in the captioned case having been read and considered, the Court finds that all known defendants were personally served or were given notice in accordance with Maryland Code Annotated, Tax – Property Article, Section 14-839 (a)(4) and also were notified by an Order of Publication issued out of this Honorable Court, and no redemption has been made by any party in interest. Therefore, it is this _____ day of _____, 202__.

ORDERED that judgment be and is hereby entered in favor of Plaintiff foreclosing the right of redemption in the properties below described: **2436 Woodbrook Avenue Lot Size 14X88-11 (being known as Ward 13, Section 07, Block 3406, Lot 027**, on the Tax Rolls of the Director of Finance).

ORDERED that plaintiff is vested with an absolute and indefeasible Fee Simple title, free and clear of all alienation and descents of the property occurring before the date of the judgment and encumbrances on the property, except taxes and municipal liens that have accrued after the date of the sale and easements of record and any other easement to which the property are subject that may be observed by an inspection of the property;

AND IT IS FURTHER ORDERED that the Director of Finance shall execute a Deed to the Plaintiff, his successors and assigns, in accordance herewith, upon payment to the said Collector of the balance of the purchase price due on account of the purchase of the above described property, together with all taxes and interest and penalties that have accrued thereon subsequent to the date of sale.

AND IT IS FURTHER ORDERED that the Supervisor of Assessments of Baltimore City shall enroll plaintiff as the Fee Simple owner of the above described property.

Plaintiff to pay open court costs.
Clerk is directed to close the case.

_____
Judge

Vanguard Ventures, Limited Liability Company	*	IN THE
	*	CIRCUIT COURT
v.	*	FOR
Iris E. Fortune, et al.	*	BALTIMORE CITY
	*	CASE NO.: 24-C-24-000218

* * * * * * * * * * * *

MD TAX-PROPERTY ARTICLE §14-836(b)(4)(iii) AFFIDAVIT

Notices Pursuant to MD Tax-Property Article §14-836(b)(4)(iii) were sent out to all parties ascertained which had any interest or judgment on or against the Subject Property – including judgment creditors, occupants or holders of any subordinate interest – that were not named as defendants in the proceeding.

In accordance with Maryland Rule 1-322.2(a)(1), I certify that the documents in the attached submission do not contain any personal identifier information described in Maryland Rule 1-322.2(b).

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

Aaron A. Naiman
Law Offices Naiman & Naiman, PA
Attorney for the Plaintiff
25 Hooks Lane, Suite 202
Baltimore, MD 21208
(410) 653-6809
aaron@naiman-law.com

RETURN OF SERVICE

State of Maryland **County of Baltimore (City)** **Circuit Court**

Case Number: 24-C-24-000218FR

Plaintiff:
Vanguard Ventures, Limited Liability Company

vs.

Defendant:
Iris E. Fortune, et al.

For:
Naiman & Naiman, Law Offices of
25 Hooks Lane
Suite 202
Baltimore, MD 21208

Received by Robin Carter on the 29th day of March, 2024 at 12:45 pm to be served on **Iris E. Fortune, 6606 Park Heights Ave., Baltimore, MD 21215**.

I, Robin Carter, do hereby affirm that on the **30th day of March, 2024** at **3:12 pm, I:**

Individually served Iris E. Fortune, the person listed as the intended recipient of the legal documents with the Writ of Summons (Redemption) Issued March 22, 2024, Complaint to Foreclose the Equity of Redemption for Non-Payment of Taxes, Exhibits, Order of Publication, and Notice to Interested Parties of Action to Foreclose the Right of Redemption in Property Sold at Tax Sale, at 6606 Park Heights Ave., Baltimore, MD 21215.

Description of Person Served: Age: 80, Sex: F, Race/Skin Color: Black, Height: 5'6", Weight: 190, Hair: Grey, Glasses: N

I HEREBY CERTIFY that I am a competent person, eighteen years of age or older, and not a party to the above legal action. I SOLEMNLY AFFIRM under the penalties of perjury that through personal knowledge, the contents of the foregoing are true.

Robin Carter

Robin Carter
Independent Process Server

De Novo Attorney Services, Inc.
info@denovoattorneyservices.com
610 Bosley Avenue, Suite 207
Baltimore, MD 21204
(800) 846-9696

Our Job Serial Number: NOV-2024001692
Ref: 24-C-24-000218FR

Copyright © 1992-2024 DreamBuilt Software, Inc. - Process Server's Toolbox V8.2k

FW: Service on the Attorney General

OAG - Civil Service
Alexis Queen
Fri, Mar 29, 2024, 11:34 AM
Summons for State of Maryland - 24-C-24-000218.pdf
Summons for State of Maryland - 24-C-24-000904.pdf
Summons for State of Maryland - 24-C-24-000903.pdf
Summons for State of Maryland - 24-C-24-000900.pdf
Summons for State of Maryland - 24-C-24-000905.pdf
Summons for State of Maryland - 24-C-24-000898.pdf
Summons for State of Maryland - 24-C-24-000899.pdf
Summons for State of Maryland - 24-C-24-000902.pdf

Service is accepted.

Wendy L. Shiff
Counsel to State's Attorneys and Other State Prosecutors
Office of the Attorney General
Civil Division
200 Saint Paul Place
Baltimore, Maryland 21202
p: 410-576-6996
wshiff@oag.state.md.us
www.marylandattorneygeneral.gov
The information contained in this communication (including any attachments) may be confidential and legally privileged. This email may not serve as a contractual agreement unless explicit written agreement for this purpose has been made. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication or any of its contents is strictly prohibited. If you have received this communication in error, please re-send this communication to the sender indicating that it was received in error and delete the original message and any copy of it from your computer system.

-----Original Message-----
From: Alexis Queen <alexis@naiman-law.com>
Sent: Friday, March 29, 2024 11:41 AM
To: OAG - Civil Service <civil_service@oag.state.md.us>

Subject: Service on the Attorney General

Good Morning,

I am serving State of Maryland's Attorney General, Anthony G. Brown, for the following cases:

24-C-24-000218

24-C-24-000904

24-C-24-000903

24-C-24-000900

24-C-24-000905

24-C-24-000898

24-C-24-000899

24-C-24-000902

Thank you,

--

Alexis Queen
Naiman & Naiman, PA
25 Hooks Lane, Suite 202
Baltimore, MD 21208
(410) 653-1919
naiman-law.com

Vanguard Ventures, Limited Liability Company	*	IN THE
Plaintiff	*	CIRCUIT COURT
	*	FOR
v.		
	*	BALTIMORE CITY
Iris E. Fortune.,et al		
	*	CASE NO.: 24-C-24-000218
Defendants		

* * * * * * * * * * * *

AFFIDAVIT OF SERVICE OF PROCESS

I, Alexis Queen, certify that on approximately March 29, 2024, served State of Maryland S/O Anthony G. Brown, Attorney General, through email with the Summons, Complaint to Foreclose Rights of Redemption with Exhibits A, B, C, D, Order of Publication, Notice to Interested Parties of Action to Foreclose the Right of Redemption in Property Sold at Tax Sale, the Affidavits of Title Search, and all related documents. I was authorized to make service on the authorized individual and send the documents to their email. Service was accepted by Wendy L. Shiff, Assistant Attorney General, Civil Litigation Division.

I further certify that I am over 18 years of age and not a party to this action.

I solemnly affirm under the penalties of perjury that the contents of this affidavit are true and correct.

Alexis Queen
Law Offices of Naiman & Naiman, PA
25 Hooks Lane, Suite 202
Baltimore, MD 21208
(410) 653-6809
aaron@naiman-law.com

Vanguard Ventures, Limited Liability Company	*	IN THE
Plaintiff	*	CIRCUIT COURT
	*	FOR
v.		
	*	BALTIMORE CITY
Iris E. Fortune., *et al.*		
	*	CASE NO.: 24-C-24-000218
Defendants		

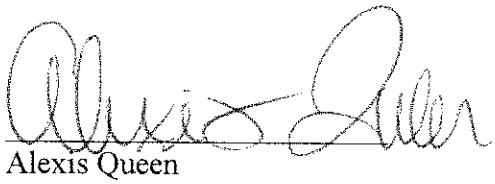
* * * * * * * * * * * *

AFFIDAVIT OF SERVICE OF PROCESS

I, Alexis Queen, certify that on approximately April 11, 2024, personally served the City of Baltimore S/O Michael Moiseyev, Director of Finance, at 100 N Holiday Street, Room 101, Baltimore, MD 21202, with the Summons, Complaint to Foreclose Rights of Redemption with Exhibits A, B, C, D, Order of Publication, Notice to Interested Parties of Action to Foreclose the Right of Redemption in Property Sold at Tax Sale, the Affidavits of Title Search, and all related documents.

I further certify that I am over 18 years of age and not a party to this action.

I solemnly affirm under the penalties of perjury that the contents of this affidavit are true and correct.



Alexis Queen
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Baltimore, MD 21208
(410) 653-6809
aaron@naiman-law.com

Vanguard Ventures, Limited Liability Company	*	IN THE
Plaintiff	*	CIRCUIT COURT
	*	FOR
v.		
	*	BALTIMORE CITY
Iris E. Fortune., *et al.*		
	*	CASE NO.: 24-C-24-000218
Defendants		

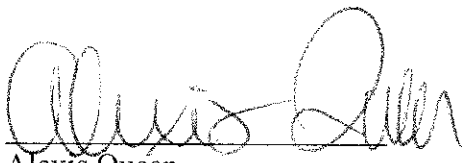
* * * * * * * * * * * *

AFFIDAVIT OF SERVICE OF PROCESS

I, Alexis Queen, certify that on approximately April 11, 2024, personally served the Mayor and City Council of Baltimore City, S/O City Solicitor, at 100 N Holiday Street, Room 101, Baltimore, MD 21202, with the Summons, Complaint to Foreclose Rights of Redemption with Exhibits A, B, C, D, Order of Publication, Notice to Interested Parties of Action to Foreclose the Right of Redemption in Property Sold at Tax Sale, the Affidavits of Title Search, and all related documents..

I further certify that I am over 18 years of age and not a party to this action.

I solemnly affirm under the penalties of perjury that the contents of this affidavit are true and correct.



Alexis Queen
Law Offices of Naiman & Naiman, PA
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Baltimore, MD 21208
(410) 653-6809
aaron@naiman-law.com

LAW OFFICES OF
NAIMAN & NAIMAN, P.A.

25 Hooks Lane
Suite 202
Baltimore, Maryland 21208

(410) 653-6809
Fax (410) 653-3478
E-MAIL: aaron@naiman-law.com

April 16, 2024

Notice of Action to Foreclose
Iris E. Fortune or Occupant
2436 Woodbrook Avenue,
Baltimore, Maryland 21217

RE: **NOTICE PURSUANT TO TAX PROPERTY ARTICLE § 14-836(b)(4)(v) 2436 WOODBROOK AVENUE, Baltimore, Maryland**
Our File No.: 23-07-488

Dear Iris E. Fortune or Occupant:

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

If you have any questions, please contact the collector at the Baltimore City Tax Sale Office, 200 North Holiday Street, Baltimore, MD 21202. phone: (410) 396-3987 fax: (410)837 - 6994.

Sincerely yours,

AN/AQ
Aaron A. Naiman

quadient
FIRST-CLASS MAIL
IMI
$000.64 2
04/16/2024 ZIP 21209
014K33222737

US POSTAGE

Notice of Action to Foreclose

Iris E Fortune or Occupant
2436 Woodbrook Avenue,
Baltimore, Maryland 21217

Vanguard Ventures, Limited Liability Company
25 Hooks Lane, Suite 202
Baltimore, MD 21208

Plaintiff

v.

Iris E. Fortune
6606 Park Heights Ave
Baltimore, MD 21215

and

State of Maryland
S/O Anthony G. Brown, Attorney General
200 St. Paul Place
Baltimore, MD 21202

and

City of Baltimore
S/O Michael Moiseyev
Director of Finance
100 N. Holiday Street
Room 454
Baltimore, MD 21202

and

The Mayor and City Council
Of Baltimore City
S/O Ebony Thompson
100 N. Holiday Street
Baltimore, MD 21202

and

All unknown owners of the property described
Below; all heirs, devisees, personal representatives,
and executors, administrators, grantees, assigns or
successors in right, title, interest, and any and all
persons having or claiming to have any interest in the
property and premises situate in the City of

* IN THE

* CIRCUIT COURT

* FOR

* BALTIMORE CITY

* CASE NO.:_____

COPY

RECEIVED
2024 JAN 11 PM 1:57
CIVIL DIVISION

Baltimore, known as 2436 Woodbrook Avenue and
described as Lot Size 14X88-11 Being known as
Ward 13 Section 07 Block 3406 Lot 027 on the Tax
Roll of the Director of Finance.
Defendants

****
***

COMPLAINT TO FORECLOSE THE EQUITY OF REDEMPTION FOR NON-PAYMENT OF TAXES

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The complaint of Vanguard Ventures, Limited Liability Company, Plaintiff, by Aaron A. Naiman and The Law Offices of Naiman & Naiman, PA, its attorney, respectfully represents unto the Honorable Court for cause:

1. That on or about 05/15/2023, Michael Moiseyev, Finance Officer of Baltimore City, Collector of Taxes for the State of Maryland and the City of Baltimore, or an otherwise acting Finance Officer of Baltimore City, Collector of Taxes for the State of Maryland and the City of Baltimore sold to Vanguard Ventures, Limited Liability Company, the hereinafter described parcel, the Fee Simple interest, in conformity with the powers and authority conferred on him by the Maryland Tax property Article, and said Finance Officer of Baltimore City issued a certificate of sale for the parcel to the Plaintiff herein. A copy of the Certificate of Tax sale is attached hereto as Plaintiff's Exhibit A. The property was deemed to be in need of substantial repair by the Department of Housing and Community Development, and this complaint is being filed in accordance with the MD Tax-Property Article §14-833(e). A copy of the letter certifying the need for substantial repair is attached as Exhibit B.

2. A description of the property in substantially the same form as the description appearing on the Treasurer's and/or Director's tax roll and Deed hereinafter referred to is: Account No. 13-07-3406-027; situate in the City of Baltimore, known as 2436 Woodbrook Avenue and described as Lot Size 14X88-11, being known as Ward 13 Section 07 Block 3406 Lot 027.

3. The amount necessary to redeem the property is $1123.51, plus interest at the rate set by the Tax Property Article from the date of the sale to the date of redemption, plus all court costs and expenses of this proceeding, including all costs, expenses and fees allowed by Maryland Code § 14-828 and § 14-843.

4. Notice of this proceeding has been given to the Collector of Taxes of Baltimore City, simultaneously with the filing of this Complaint.

5. A complete search of the Land Records of Baltimore City, and the records of the Register of Wills for Baltimore City, and of the Circuit Court for Baltimore City in accordance with generally accepted standards of title examination for at least forty (40) years was performed immediately prior to the institution of this suit and said search revealed that the Fee Simple title or other legal interest to said property was vested in Defendants at the time of the aforementioned Tax Sale, as shown in the Affidavit of Title Search, filed hereinwith and made a part hereof. A copy of the Title Search is attached hereto as Plaintiff's Exhibit C and a copy of the Affidavit of Title search is attached as Exhibit D.

6. That this proceeding to foreclose the right of redemption is brought within two (2) years from the date of issuance of the aforesaid Tax Sale Certificate, and the property has not been redeemed by any party in interest.

WHEREFORE, the Plaintiff requests:

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

B. That this Honorable Court may pass a judgment foreclosing the right of redemption vesting in the Plaintiff a Fee Simple title, for said properties and to bar all rights of redemption, and to foreclose all prior or subsequent alienations and descents of property herein described and all encumbrances thereon, except public easements to which this property is subject, taxes and other municipal liens accruing to the aforementioned tax sale.

C. That a writ of subpoena be issued to the Mayor and City Council of Baltimore, all defendants in the case and all persons unknown, having or claiming to have any interest in the aforesaid lots of ground, of the object and substance of this complaint, warning them to appear in this Court, in person or by an attorney, on or before the _____ day of _____, 20__, to answer said complaint as to the above described lot of ground, warning

them in case of failure to do so, a Final Decree will be passed foreclosing all rights of redemption in the lot of ground hereinabove referred to.

D. That the Court issue an Order of Publication directed to all parties in interest in the property.

E. And for such other relief as the nature of their cause require.

Aaron A. Naiman
Law Offices Naiman & Naiman, PA
Attorney for the Plaintiff
25 Hooks Lane, Suite 202
Baltimore, MD 21208
(410) 653-6809
aaron@naiman-law.com

Vanguard Ventures, Limited Liability Company 25 Hooks Lane, Suite 202 Baltimore, MD 21208	*	IN THE
	*	CIRCUIT COURT
Plaintiff	*	FOR
v.	*	BALTIMORE CITY
	*	CASE NO.:_____

Iris E. Fortune
6606 Park Heights Ave
Baltimore, MD 21215

and

State of Maryland
S/O Anthony G. Brown, Attorney General
200 St. Paul Place
Baltimore, MD 21202

and

City of Baltimore
S/O Michael Moiseyev
Director of Finance
100 N. Holiday Street
Room 454
Baltimore, MD 21202

and

The Mayor and City Council
Of Baltimore City
S/O Ebony Thompson
100 N. Holiday Street
Baltimore, MD 21202

and

All unknown owners of the property described Below; all heirs, devisees, personal representatives, and executors, administrators, grantees, assigns or successors in right, title, interest, and any and all persons having or claiming to have any interest in the property and premises situate in the City of Baltimore, known as 2436 Woodbrook Avenue and described as Lot Size 14X88-11 Being known as

Ward 13 Section 07 Block 3406 Lot 027 on the Tax
Roll of the Director of Finance.

Defendants

****

Order of Publication

The object of this proceeding is to secure the foreclosure of all rights of redemption from tax sale on the property known as 2436 Woodbrook Avenue in Baltimore City, State of Maryland, sold by the Finance Officer of Baltimore City, State of Maryland to Vanguard Ventures, Limited Liability Company, the Plaintiff.

A DESCRIPTION of the property in substantially the same form as the description appearing on the Certificate of Tax Sale is as follows: Lot Size 14X88-11, Ward 13 Section 07 Block 3406 Lot 027 Known as 2436 Woodbrook Avenue.

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

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

_____

Judge

_____

Aaron A. Naiman
Law Offices Naiman & Naiman, PA
Attorney for the Plaintiff
25 Hooks Lane, Suite 202
Baltimore, MD 21208
(410) 653-6809
aaron@naiman-law.com

To the Daily Record:
Please Bill:
Law Offices of Naiman & Naiman, PA
25 Hooks Lane, Suite 202
Baltimore, MD 21208

Vanguard Ventures, Limited Liability Company 25 Hooks Lane, Suite 202 Baltimore, MD 21208	*	IN THE
	*	CIRCUIT COURT
Plaintiff	*	FOR
v.	*	BALTIMORE CITY
	*	CASE NO.:_____

Iris E. Fortune
6606 Park Heights Ave
Baltimore, MD 21215

and

State of Maryland
S/O Anthony G. Brown, Attorney General
200 St. Paul Place
Baltimore, MD 21202

and

City of Baltimore
S/O Michael Moiseyev
Director of Finance
100 N. Holiday Street
Room 454
Baltimore, MD 21202

and

The Mayor and City Council
Of Baltimore City
S/O Ebony Thompson
100 N. Holiday Street
Baltimore, MD 21202

and

All unknown owners of the property described Below; all heirs, devisees, personal representatives, and executors, administrators, grantees, assigns or successors in right, title, interest, and any and all persons having or claiming to have any interest in the property and premises situate in the City of Baltimore, known as 2436 Woodbrook Avenue and described as Lot Size 14X88-11 Being known as Ward 13 Section 07 Block 3406 Lot 027 on the Tax

Roll of the Director of Finance.

Defendants

****

Order of Publication

The object of this proceeding is to secure the foreclosure of all rights of redemption from tax sale on the property known as 2436 Woodbrook Avenue in Baltimore City, State of Maryland, sold by the Finance Officer of Baltimore City, State of Maryland to Vanguard Ventures, Limited Liability Company, the Plaintiff.

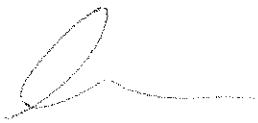
A DESCRIPTION of the property in substantially the same form as the description appearing on the Certificate of Tax Sale is as follows: Lot Size 14X88-11, Ward 13 Section 07 Block 3406 Lot 027 Known as 2436 Woodbrook Avenue.

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

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

_____

Judge



Aaron A. Naiman
Law Offices Naiman & Naiman, PA
Attorney for the Plaintiff
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_____

Judge

Aaron A. Naiman
Law Offices Naiman & Naiman, PA
Attorney for the Plaintiff
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Baltimore, MD 21208
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VANGUARD VENTURES, LIMITED LIABILITY COMPANY	*	IN THE
	*	CIRCUIT COURT
v.	*	FOR
IRIS E. FORTUNE, et al.	*	BALTIMORE CITY
	*	CASE NO.:__________

* *

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

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

A. The object of the proceeding is to secure the foreclosure of all rights of redemption in the following property situated and lying in Baltimore City and the State of Maryland, to the Plaintiff in this proceeding. The Complaint states, among other things, that the amount necessary for the redemption has not been paid.

B. Description of the particular property included in the foreclosure proceeding: Certificate No.: 387794, situate in the City of Baltimore, known as: 2436 Woodbrook Avenue, and described as Lot Size 14X88-11, Ward 13, Section 07, Block 3406, Lot 027.

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

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

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

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

_____
Clerk of the Circuit Court for
Baltimore City, Maryland

Aaron A. Naiman
Law Offices Naiman & Naiman, PA
Attorney for the Plaintiff
25 Hooks Lane, Suite 202
Baltimore, MD 21208
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VANGUARD VENTURES, LIMITED LIABILITY COMPANY	*	IN THE
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IRIS E. FORTUNE, et al.	*	BALTIMORE CITY
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D. Failure to redeem the property or answer the Complaint may result in a Final Judgment Foreclosing all Rights of Redemption in and as to the Property and vesting in the Plaintiff a title, free and clear of all encumbrances.

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

_____
Clerk of the Circuit Court for
Baltimore City, Maryland

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Attorney for the Plaintiff
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VANGUARD VENTURES, LIMITED LIABILITY COMPANY	*	IN THE
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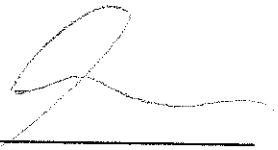
    b. The date specified in the Order of Publication or
    c. 33 days after the mailing out of said Order of Publication

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

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

_____
Clerk of the Circuit Court for
Baltimore City, Maryland



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NO. 387794

CERTIFICATE OF TAX SALE
MADE BY
DIRECTOR OF FINANCE OF BALTIMORE

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

I sold to VANGUARD VENTURES LLC
920 S CONKLING ST BALTIMORE, MD 21224

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

2436 WOODBROOK AVE

and described as follows: Lot Size 14X88-11

(Being known as Ward 13 Section 07 Block 3406 Lot 027 on the Tax Roll of the Director of Finance).

Said property having been assessed to FORTUNE, IRIS E 6606 PARK HEIGHTS AVE

Was sold for the sum of SEVENTEEN THOUSAND EIGHT HUNDRED FIFTY AND 00/100 DOLLARS

of which ONE THOUSAND ONE HUNDRED TWENTY-THREE AND 51/100 DOLLARS

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

Witness my hand and seal this FIFTEENTH day of MAY 2023

MICHAEL MOISEYEV
Director of Finance/Collector

TXSL12 Rev. 0 10/2014

Exhibit A

BALTIMORE CITY
DEPARTMENT OF HOUSING &
COMMUNITY DEVELOPMENT

November 7, 2023

Naiman & Naiman
25 Hooks Lane
Suite 202
Baltimore, Maryland 21208

RE: 2436 Woodbrook Avenue

To Whom it May Concern:

This is to certify that the building or structure on the property described on the Tax Roll of the Director of Finance as 2436 Woodbrook Avenue known as **Block 3406 Lot 027** is an abandoned property consisting of improved property cited as vacant and unfit for human habitation on a housing or building violation notice. This certificate is issued in accordance with and under the provisions of the Annotated Code of Maryland, Tax Property Article 14-833.

Sincerely,

Building Official

cc: Tammy Hollie, Department of Finance

VERIFICATION

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

12/09/2023

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

Exhibit B

PICKWICK TITLE AND LEGAL SERVICES CO., LLC

3835 Naylors Lane
Baltimore MD 21208
Tel: (410) 404-2178

TITLE SEARCH REPORT FORM

INFORMATION REPORT FOR: **Vanguard Ventures Limited Liability Company**
SEACH TYPE: **40 YEAR** FILE NO. **23-07-488**
TITLE ABSTRACT: $250.00

DEED INFORMATION

Tenancy: S/O Estate: FEE SIMPLE
Address: 2436 Woodbrook Avenue, BALTIMORE, MARYLAND.
Vested In: Iris E. Fortune,
From: William R. Brown Jr.,
Liber 8887 Page 126 Executed December 11, 1998 Recorded September 30, 1999
Tax ID No. 13-07-3406-027

MORTGAGE / DEED OF TRUST

None

JUDGMENTS

____OK X Possible Judgments _____ Judgments to Follow

NOTES

Submit Date: 12/26/23 **Current Through:** 12/19/23
ABSTRACTED BY: A. Naiman

Exhibit C

VANGUARD VENTURES, LIMITED LIABILITY COMPANY	*	IN THE
	*	CIRCUIT COURT
v.	*	FOR
IRIS E. FORTUNE, et al.	*	BALTIMORE CITY
	*	CASE NO.:_______________

* *

AFFIDAVIT OF TITLE SEARCH – UNKNOWN OWNER
2436 Woodbrook Avenue

Pursuant to Maryland Rule 14-502 and Maryland Tax-Property Article § 14-838, I, Aaron A. Naiman, of Pickwick Title and Legal Services, LLC, am over the age of 18 and am competent to make this affidavit, and I hereby certify that on 12/26/23, I personally conducted a title examination for the property known as 2436 Woodbrook Avenue, Baltimore, Maryland, which included a complete search of the records of the Land Records Office for Baltimore City, the Circuit Court for Baltimore City, and the Register of Wills for Baltimore City, in accordance with generally accepted standards of title examination for the period of at least 40 years and an owner of the property or part of the property is unknown.

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

____
Aaron A. Naiman
Pickwick Title and Legal Services, LLC

Date: December 26, 2023

Exhibit D

VANGUARD VENTURES, LIMITED LIABILITY COMPANY	*	IN THE
	*	CIRCUIT COURT
v.	*	FOR
IRIS E. FORTUNE, et al.	*	BALTIMORE CITY
	*	CASE NO.:___________

* *

ABSTRACTOR'S AFFIDAVIT OF TITLE SEARCH
2436 Woodbrook Avenue

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

____
Aaron A. Naiman
Pickwick Title and Legal Services, LLC

Date: December 26, 2023