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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MALHEUR

MALHEUR COUNTY, *a political subdivision of the State of Oregon.*

Plaintiff,

v.

CRAIG R. BUCHMAN, JOHN CASTAGNA, CMRD INVESTMENTS LLC, CHAMONIX SERVICES INC, ENVIRONMENTAL DEVELOPMENT LTD, NETTIE M. HIATT, ALLEN L. JONES, STEVEN R. ROSS, GERALD B. MADLEY, MAUDE NUCHOLS, RYAN OLSEN, SHARONA OLSEN, JESSE ORTEGA, REBECCA M. ORTEGA, NICHOLAS C. PETRIS, ANNA S. PETRIS, RICHARD POLLOCK, FRANK C. REEVES AND JOSEPHINE M. REEVES, TRUSTEES of the Frank C. Reeves Family Trust, ROTARY CORRUGATOR COMPANY, STANLEY SCHNEITER, TYSON SIEBERTZ, KIM SUSAN STEWART, JOHN VILLEGAS, ALLEN WAYNE WILSON, LINDA R WILSON, REED K. YOUNG, PATRICIA G. YOUNG, *and also any persons owning or claiming to own or having or claiming to have any interest in any property included in the 2021 Tax Foreclosure List described herein,*

Defendants.

Case No.
COMPLAINT

(Application for judgment of foreclosure of tax liens)

CLAIMS NOT SUBJECT TO MANDATORY
ARBITRATION

Plaintiff alleges:

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Plaintiff, a duly organized county and political subdivision of the State of Oregon,
through its tax collector is required to commence tax foreclosure proceedings pursuant to ORS
312.050.

2

Plaintiff has prepared a list of real properties subject to foreclosure for delinquent taxes
pursuant to ORS 312.030, which contains the names of the several persons appearing on the
latest tax roll as the respective owners of the tax delinquent properties, a description of each such
property as the same appears in said latest tax roll, the year or years for which taxes are
delinquent on each property, together with the principal amount of the delinquent taxes of each
year, and the amount of accrued interest thereon to September 15, 2021. The Tax Foreclosure
List is attached as "Exhibit 1" and incorporated herein.

3

The Tax Foreclosure List includes all real properties appearing on the tax rolls in the
Office of Malheur County Tax Collector on which taxes, together with all special assessments,
fees and other charges, have been delinquent for more than three (3) years from the earliest date
of such delinquency. By reason of the expiration of more than three (3) years from the earliest
date of delinquency the lien of all such delinquent taxes against each of the properties included in
the Tax Foreclosure List has become subject to foreclosure under the provisions of ORS
312.030.

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The amounts shown by the Tax Foreclosure List to be due and owing against the several parcels of real property described therein include all taxes both prior to and subsequent to 2020-21 which were unpaid and delinquent on May 18, 2021, together with the accrued interest thereon; that the several defendants and each and every other person owning or claiming to own, or having or claiming to have any interest in any of said properties have neglected and refused to pay such delinquent taxes and interest; that there is due, owing and unpaid to Plaintiff the sums set out in the Tax Foreclosure List after the description of each of the several properties, and in addition thereto, interest on each of said sums at the rate of sixteen percent (16%) per annum on all delinquencies.

5

The defendants above named include each and every person appearing on the latest tax roll as the owner or owners of the several properties described in the Tax Foreclosure List and the amount of taxes which remain delinquent and unpaid as of August 24, 2021 .

6

Where reference is made to a map, tax lot number and account/reference number in describing any parcel of property in the Tax Foreclosure List, such reference is to the record as of January 1, 2021, made and kept by the Office of Malheur County Assessor, which said record is a public record under ORS 308.240.

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Defendants above named, including any unknown owners, have or claim to have some interest or estate in the properties described in the Tax Foreclosure List, but whatever interest or estate they may have or claim to have is inferior and subject to the tax liens of Plaintiff.

As to each of the properties described in the Tax Foreclosure List that are held under outstanding registration of title certificates, Plaintiff will apply to the court for cancellation of all such certificates and for authorization to take such action as is necessary under Oregon law so as to properly vest title to such properties of record in the Plaintiff.

Each of the properties described in the Tax Foreclosure List was duly listed for taxation in or for each of the specified years and the assessments, equalizations, levies of taxes and all other acts required by law to make such taxes first liens on said properties were duly and regularly made and done, and that the liens and claims of Plaintiff to each of the several properties are first liens and paramount to any other interest, title estate or claim in or to any of said properties.

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Upon sale of the foreclosed properties, Plaintiff may require the assistance of this court to remove persons and property unlawfully occupying foreclosed properties.

WHEREFORE, Plaintiff prays for General Judgment of this court for the full amount of taxes, special assessments, fees or other charges, and interest due on and charged against each of the several properties on the Tax Foreclosure List, together with interest thereon at the rate of sixteen percent (16%) per annum from September 15, 2021 to the date of such General Judgment, and accruing interest on said General Judgment at the legal rate of interest per annum thereafter; and

For a General Judgment that the amounts of such taxes, special assessments, fees or other charges and interest are first liens on the respective parcels of real property included in the Tax Foreclosure List; and that such liens are paramount and superior to any and all claims to such properties by defendants, or any of them by any person known or unknown, owing or claiming to own, or having or claiming to have any lien thereon, or right, title or interest therein, and that each and all of them be forever foreclosed and barred from asserting any claims whatsoever to any of said real properties adverse to the liens and claims of Plaintiff, its successors or assigns, excepting only the right of redemption provided by law; and that the several properties against which the General Judgment is entered shall be ordered sold to Malheur County for the respective amounts of taxes and interest for which such properties are severally liable; and

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That the Clerk of the Court be directed to serve on the Tax Collector of Malheur County, a certified copy of the General Judgment, included in which shall be a list of the properties so ordered sold, with the amounts due thereon; and that said General Judgment, shall constitute and be considered to all intents and purposes a certificate of sale to Malheur County for each of the properties therein described; that where any parcel of real property covered by such General Judgment is under a registration of title certificate, such certificate shall be cancelled, and that such further action shall be taken under the provision of Oregon Laws so as to properly vest title to such properties in the Plaintiff; that said Tax Collector shall take further steps in the matter as are provided by law; and for such other and further relief as may be just and equitable in the premises, including as appropriate the remedies of Writ of Assistance or Writ of Execution to obtain possession of the foreclosed properties.

Dated this 24h day of August 2021.

s/Stephanie Williams
County Counsel, Malheur County, Oregon
OSB #925449
swilliams@malheurco.org
Attorney for Plaintiff

2021 FORECLOSURE LIST

TAX YEAR	TAX AMT	INT TO 9/15/2021	TOTAL AMOUNT
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MAP/LOT 15S4004 1500 CODE- 47			
ACCT#- 14763		CRAIG R BUCHMAN	
2017/18	5.95	3.41	9.36
2018/19	6.12	2.52	8.64
2019/20	6.25	1.59	7.84
<u>2020/21</u>	<u>8.19</u>	<u>.76</u>	<u>8.95</u>
TOTAL	26.51	8.28	34.79

MAP/LOT 31S41 13700 CODE- 39			
ACCT#- 11929		JOHN CASTAGNA	
2017/18	10.24	5.86	16.10
2018/19	10.60	4.38	14.98
2019/20	10.88	2.75	13.63
<u>2020/21</u>	<u>11.17</u>	<u>1.05</u>	<u>12.22</u>
TOTAL	42.89	14.04	56.93

MAP/LOT 17S4710 1400 CODE- 12			
ACCT#- 6473		CMRD INVESTMENTS LLC	
2017/18	1,137.59	651.00	1,788.59
2018/19	1,175.72	485.93	1,661.65
2019/20	1,191.48	301.80	1,493.28
<u>2020/21</u>	<u>1,248.95</u>	<u>116.53</u>	<u>1,365.48</u>
TOTAL	4,753.74	1,555.26	6,309.00

MAP/LOT 17S4710 1400 CODE- 12			
ACCT#-900158		CHAMONIX SERVICES INC	
2017/18	152.18	86.49	238.67
2018/19	179.40	74.15	253.55
2019/20	175.17	44.37	219.54
<u>2020/21</u>	<u>173.62</u>	<u>16.20</u>	<u>189.82</u>
TOTAL	680.37	221.21	901.58

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MAP/LOT 18S4520CC 103 CODE- 3
ACCT#- 4633 ENVIRONMENTAL DEVELOPMENT LTD

2017/18	19.55	11.21	30.76
2018/19	20.31	8.40	28.71
2019/20	20.82	5.28	26.10
<u>2020/21</u>	<u>21.37</u>	<u>1.99</u>	<u>23.36</u>
TOTAL	82.05	26.88	108.93

MAP/LOT 18S4520CC 104 CODE- 3
ACCT#- 4634 ENVIRONMENTAL DEVELOPMENT LTD

2017/18	18.37	10.53	28.90
2018/19	19.08	7.88	26.96
2019/20	19.56	4.95	24.51
<u>2020/21</u>	<u>20.07</u>	<u>1.87</u>	<u>21.94</u>
TOTAL	77.08	25.23	102.31

MAP/LOT 15S4224CB 402 CODE- 9
ACCT#- 5705 ENVIRONMENTAL DEVELOPMENT LTD

2017/18	1.86	1.07	2.93
2018/19	1.95	.80	2.75
2019/20	2.00	.51	2.51
<u>2020/21</u>	<u>2.02</u>	<u>.19</u>	<u>2.21</u>
TOTAL	7.83	2.57	10.40

MAP/LOT 19S4719D 100 CODE- 29
ACCT#- 9731 NETTIE M HIATT
ALLEN L JONES
STEVEN R ROSS

2017/18	1,423.17	815.86	2,239.03
2018/19	1,488.81	615.33	2,104.14
2019/20	1,604.31	406.38	2,010.69
<u>2020/21</u>	<u>1,637.60</u>	<u>152.78</u>	<u>1,790.38</u>
TOTAL	6,153.89	1,990.35	8,144.24

MAP/LOT 30S41 1202 CODE- 39
ACCT#- 11767 GERALD B MADLEY

2017/18	.47	.25	.72
2018/19	2.71	1.12	3.83
2019/20	2.80	.71	3.51
<u>2020/21</u>	<u>2.86</u>	<u>.27</u>	<u>3.13</u>
TOTAL	8.84	2.35	11.19

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MAP/LOT 31S41	11700 CODE- 39		
ACCT#- 11914	MAUDE NUCHOLS		
2017/18	20.43	11.71	32.14
2018/19	21.12	8.73	29.85
2019/20	21.72	5.49	27.21
<u>2020/21</u>	<u>22.28</u>	<u>2.08</u>	<u>24.36</u>
TOTAL	85.55	28.01	113.56

MAP/LOT 16S47	3000 CODE- 52		
ACCT#- 15136	RYAN OLSEN		
	SHARONA OLSEN		
2017/18	2,737.93	1,568.37	4,306.30
2018/19	2,867.79	1,185.26	4,053.05
2019/20	2,931.97	742.67	3,674.64
<u>2020/21</u>	<u>2,997.48</u>	<u>279.67</u>	<u>3,277.15</u>
TOTAL	11,535.17	3,775.97	15,311.14

MAP/LOT 19S4732AB	400 CODE- 2		
ACCT#- 3909	JESSE ORTEGA		
	REBECCA M ORTEGA		
2017/18	79.02	43.30	122.32
2018/19	155.86	64.42	220.28
2019/20	160.83	40.74	201.57
<u>2020/21</u>	<u>165.11</u>	<u>15.41</u>	<u>180.52</u>
TOTAL	560.82	163.87	724.69

MAP/LOT 19S4732AB	400 CODE- 2		
ACCT#- 903185	JESSE ORTEGA		
	REBECCA M ORTEGA		
2017/18	81.67	45.49	127.16
2018/19	121.81	50.34	172.15
2019/20	128.01	32.43	160.44
<u>2020/21</u>	<u>127.56</u>	<u>11.91</u>	<u>139.47</u>
TOTAL	459.05	140.17	599.22

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MAP/LOT 33S3915 2100 CODE- 39
ACCT#- 12282 NICHOLAS C PETRIS
ANNA S PETRIS

2017/18	4.64	2.66	7.30
2018/19	4.79	1.98	6.77
2019/20	4.93	1.25	6.18
<u>2020/21</u>	<u>5.03</u>	<u>.47</u>	<u>5.50</u>
TOTAL	19.39	6.36	25.75

MAP/LOT 21S3817CD 600 CODE- 5
ACCT#- 5385 RICHARD POLLOCK

2017/18	5.64	3.23	8.87
2018/19	5.83	2.41	8.24
2019/20	6.00	1.53	7.53
<u>2020/21</u>	<u>6.15</u>	<u>.57</u>	<u>6.72</u>
TOTAL	23.62	7.74	31.36

MAP/LOT 41S4318D 800 CODE- 41
ACCT#- 12810 FRANK C REEVES, TRUSTEE
JOSEPHINE M REEVES, TRUSTEE
of the FRANK C REEVES FAMILY TRUST

2017/18	15.61	8.95	24.56
2018/19	15.83	6.54	22.37
2019/20	15.16	3.84	19.00
<u>2020/21</u>	<u>15.68</u>	<u>1.47</u>	<u>17.15</u>
TOTAL	62.28	20.80	83.08

MAP/LOT 18S4710D 1000 CODE- 1
ACCT#- 16411 ROTARY CORRUGATOR COMPANY

2017/18	1,269.76	727.95	1,997.71
2018/19	1,309.60	541.26	1,850.86
2019/20	1,395.52	353.48	1,749.00
<u>2020/21</u>	<u>1,432.85</u>	<u>133.69</u>	<u>1,566.54</u>
TOTAL	5,407.73	1,756.38	7,164.11

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MAP/LOT 18S4710D	1000 CODE-	1		
ACCT#- 901289	ROTARY CORRUGATOR COMPANY			
2017/18	7.22	4.14	11.36	
2018/19	7.37	3.05	10.42	
2019/20	7.50	1.89	9.39	
<u>2020/21</u>	<u>7.48</u>	<u>.69</u>	<u>8.17</u>	
TOTAL	29.57	9.77	39.34	

MAP/LOT 36S37	8701 CODE-	41		
ACCT#- 12638	STANLEY W SCHNEITER			
2017/18	1.79	1.02	2.81	
2018/19	1.82	.75	2.57	
2019/20	1.81	.46	2.27	
<u>2020/21</u>	<u>1.86</u>	<u>.17</u>	<u>2.03</u>	
TOTAL	7.28	2.40	9.68	

MAP/LOT 20S4205BC	3800 CODE-	16		
ACCT#- 8921	TYSON SIEBERTZ			
2017/18	227.30	130.31	357.61	
2018/19	234.49	96.91	331.40	
2019/20	240.63	60.96	301.59	
<u>2020/21</u>	<u>246.62</u>	<u>23.01</u>	<u>269.63</u>	
TOTAL	949.04	311.19	1,260.23	

MAP/LOT 31S4125	2200 CODE-	39		
ACCT#- 11964	KIM SUSAN STEWART			
2017/18	20.68	11.86	32.54	
2018/19	21.39	8.84	30.23	
2019/20	22.00	5.58	27.58	
<u>2020/21</u>	<u>22.59</u>	<u>2.10</u>	<u>24.69</u>	
TOTAL	86.66	28.38	115.04	

MAP/LOT 33S39	8500 CODE-	39		
ACCT#- 12322	JOHN VILLEGAS			
2017/18	20.43	11.71	32.14	
2018/19	21.12	8.73	29.85	
2019/20	21.72	5.49	27.21	
<u>2020/21</u>	<u>22.28</u>	<u>2.08</u>	<u>24.36</u>	
TOTAL	85.55	28.01	113.56	

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MAP/LOT 18S4704AD 4201 CODE- 1
ACCT#- 671 ALLEN WAYNE WILSON
LINDA R WILSON

2017/18	298.89	159.40	458.29
2018/19	944.68	390.43	1,335.11
2019/20	1,006.36	254.91	1,261.27
<u>2020/21</u>	<u>1,033.13</u>	<u>96.39</u>	<u>1,129.52</u>
TOTAL	3,283.06	901.13	4,184.19

MAP/LOT 18S4704AD 4403 CODE- 1
ACCT#- 683 REED K YOUNG
PATRICIA G YOUNG

2017/18	910.76	514.08	1,424.84
2018/19	1,139.62	471.01	1,610.63
2019/20	1,252.46	317.25	1,569.71
<u>2020/21</u>	<u>1,285.94</u>	<u>119.98</u>	<u>1,405.92</u>
TOTAL	4,588.78	1,422.32	6,011.10