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IN THE TWENTY-SECOND JUDICIAL DISTRICT
DISTRICT COURT OF BROWN COUNTY, KANSAS
CIVIL DEPARTMENT

THE BOARD OF COUNTY COMMISSIONERS	)	
OF THE COUNTY OF BROWN, KANSAS,	)	
Plaintiff,	)	
	)	
Vs.	)	Case No.
	)	
NEKSEN, ET AL,	)	
Defendants.	)	

PURSUANT TO CHAPTER 60 AND 79 OF
KANSAS STATUTE ANNOTATED.

PETITION

Parcel No. 1
Tax ID No. 1-00045
Parcel No. 10
Tax ID No. 1-00569

BBT Rentals, LLC
70655 648th Ave
Falls City, NE 68355

BBT Rentals, LLC
Robert Witt, Res. Agt.
411 S. 1st
Hiawatha, KS 66434

BBT Rentals, LLC
505 Miami St
Hiawatha, KS 66434

BBT Rentals, LLC
c/o Don Ingram, Deceased
411 S 1st St
Hiawatha, KS 66434

BBT Rentals, LLC
903 Shawnee St
Hiawatha, KS 66434

Parcel No. 2
Tax ID No. 1-00085

Anne Marie Radley
110 Shawnee St
Hiawatha, KS 66434

Anne Marie Radley
211 N 5th St
Hiawatha, KS 66434

Parcel No. 3
Tax ID No. 1-00181

Kelly D Johansen
2242 Nighthawk Rd
Hiawatha, KS 66434

Candy A Johansen
2242 Nighthawk Rd
Hiawatha, KS 66434

Kelly D Johansen
209 Utah St
Hiawatha, KS 66434

Candy A Johansen
209 Utah St
Hiawatha, KS 66434

Kelly D. Johansen
c/o Beverly Stone
204 Miami St.
Hiawatha, KS 66434

Candy A. Johansen
c/o Beverly Stone
204 Miami St.
Hiawatha, KS 66434

Parcel No. 4
Tax ID No. 1-00398
Parcel No. 11
Tax ID No. 1-00570

Patrick M Denton
1420 Santa Fe St
Atchison, KS 66002

Oliva D Denton
1420 Santa Fe St
Atchison, KS 66002

Patrick M Denton
209 Oregon St
Hiawatha, KS 66434

Oliva D Denton
209 Oregon St
Hiawatha, KS 66434

Patrick M Denton
1109 Utah St
Hiawatha, KS 66434

Olivia D Denton
1109 Utah St
Hiawatha, KS 66434

Parcel No. 5
Tax ID No. 1-00427

Norma Jean Molitor
c/o Tina S. Keys
P O Box 758
Ulysses, KS 67880

Norma Jean Molitor
400 S 4th St
Hiawatha, KS 66434

Parcel No. 6
Tax ID No. 1-04126

Jeremy Lee Deshazo
744 N 7th St
Everest, KS 66424

Barbara Deshazo
744 N 7th St
Everest, KS 66424

Jeremy Lee Deshazo
328 S 7th St
Everest, KS 66424

Barbara Deshazo
328 S 7th St
Everest, KS 66424

Parcel No. 7
Tax ID No. 1-00533

Jordan Moore
441 NE Sumner St
Topeka, KS 66616

Michellelynn Trundle
441 NE Sumner St
Topeka, KS 66616

Jordan Moore
808 Kickapoo St
Hiawatha, KS 66434

Michellelynn Trundle
808 Kickapoo St
Hiawatha, KS 66434

Parcel No. 8
Tax ID No. 1-00537
Parcel No. 9
Tax ID No. 1-00544

Edward R Garber
623 Jefferson St
Sabetha, KS 66534

Edward R Garber
905 Utah St
Hiawatha, KS 66434

Edward R Garber
906 Kickapoo St
Hiawatha, KS 66434

Parcel No. 10
Tax ID No. 1-00569

See Parcel No. 1

Parcel No. 11
Tax ID No. 1-00570

See Parcel No. 4

Parcel No. 12
Tax ID No. 1-00595

Roy B Shaw
300 S 10th St
Hiawatha, KS 66434

Suzanne M Shaw
300 S 10th St
Hiawatha, KS 66434

Parcel No. 13
Tax ID No. 1-00600

Corey A Gorman
809 Shawnee St
Hiawatha, KS 66434

Parcel No. 14
Tax ID No. 1-00606

Elizabeth Lemons
805 Kickapoo St
Hiawatha, KS 66434

Elizabeth Lemons
901 Kickapoo St
Hiawatha, KS 66434

Parcel No. 15
Tax ID No. 1-00712

Kiatona Turner
1011 Pottawatomie St
Hiawatha, KS 66434

Parcel No. 16
Tax ID No. 1-00866

Lisa N Radley
511 Navajo St
Hiawatha, KS 66434

Lisa N Radley
508 Oregon St
Hiawatha, KS 66434

Parcel No. 17
Tax ID No. 1-04231
Parcel No. 18
Tax ID No. 1-02035

REDEEMED

Parcel No. 19
Tax ID No. 1-02115

Leo R Moore
c/o Eric Statler
206 E Miami St Apt 3
Hiawatha, KS 66434

Kathryn L Moore
c/o Eric Statler
206 E Miami St Apt 3
Hiawatha, KS 66434

Leo R Moore
353 W 8th St
Horton, KS 66439

Kathryn L Moore
353 W 8th St
Horton, KS 66439

Parcel No. 20
Tax ID No. 1-02184

Stephen S Kagin
c/o Lennon Barber
1321 1st Ave E
Horton, KS 66439

Lennon J Barber
1321 1st Ave E
Horton, KS 66439

Parcel No. 21
Tax ID No. 1-02215

Don Doxtator
444 E 12th St
Horton, KS 66439

Parcel No. 22
Tax ID No. 1-02222
Parcel No. 32
Tax ID No. 1-02773
Parcel No. 44
Tax ID No. 1-03006
Parcel No. 50
Tax ID No. 1-03184
Parcel No. 52
Tax ID No. 1-03213

Lisa Ann Sadler
440 E 9th St
Horton, KS 66439

Lisa Ann Sadler
400 3rd Ave E
Horton, KS 66439

Lisa Ann Sadler
c/o Rubye E. Sadler
6940 Drywood Way
Orangevale, CA 95662

Lisa Ann Sadler
450 W 12th St
Horton, KS 66439

Lisa Ann Sadler
437 W 12th St
Horton, KS 66439

Lisa Ann Sadler
427 E 12th St
Horton, KS 66439

Parcel No. 23
Tax ID No. 1-0222401
Parcel No. 58
Tax ID No. 1-03321

Brandon I Hollister
434 W 10th St
Horton, KS 66439

Brandon I Hollister
235 E 7th St
Horton, KS 66439

Brandon I Hollister
332 E 12th St
Horton, KS 66439

Parcel No. 24
Tax ID No. 1-02266

Jackie L Wilson
c/o Dawnn Henry
P O Box 54
Centralia, KS 66415

Jackie L Wilson
424 E 10th St
Horton, KS 66439

Parcel No. 25
Tax ID No. 1-02281

Terry L Platt
315 E 12th St
Horton, KS 66439

Shirley A Platt
315 E 12th St
Horton, KS 66439

Levi Platt
315 E 12th St
Horton, KS 66439

Tisha Platt
315 E 12th St
Horton, KS 66439

Tisha Platt
335 E 12th St
Horton, KS 66439

Terry L Platt
335 E 12th St
Horton, KS 66439

Shirley A Platt
335 E 12th St
Horton, KS 66439

Levi Platt
335 E 12th St
Horton, KS 66439

Parcel No. 26
Tax ID No. 1-02556

Helen Jo Paden
1127 W 11th St
Horton, KS 66439

Helen Jo Paden
921 1st Ave E
Horton, KS 66439

Parcel No. 27
Tax ID No. 1-02560

Skylar J Dobson
507 Washington St
Robinson, KS 66532

Misty M Dobson
507 Washington St
Robinson, KS 66532

Skylar J Dobson
245 E 10th St
Horton, KS 66439

Misty M Dobson
245 E 10th St
Horton, KS 66439

Parcel No. 28
Tax ID No. 1-02721

Lisa Manlove
c/o Sohn Manlove
8445 Lowell Ave
Overland Park, KS 66212

David Manlove
c/o Sohn Manlove
8445 Lowell Ave
Overland Park, KS 66212

Lisa Manlove
1520 2nd Ave W
Horton, KS 66439

David Manlove
1520 2nd Ave W
Horton, KS 66439

Parcel No. 29
Tax ID No. 1-02696

REDEEMED

Parcel No. 30
Tax ID No. 1-0273301

Wayland G Saxton
5292 326th Rd
Horton, KS 66439

Wayland G Saxton
319 E 10th St
Horton, KS 66439

Parcel No. 31
Tax ID No. 1-02744

Randy L Vaughn
1567 Euclid Ave
Horton, KS 66439

Beth G Wabnum
1567 Euclid
Horton, KS 66439

Parcel No. 32
Tax ID No. 1-02773

See Parcel No. 22

Parcel No. 33
Tax ID No. 1-02792

Parcel No. 68
Tax ID No. 1-04124

Robert D Hicks
721 N 7th St
Everest, KS 66424

Betty J Hicks
721 N 7th St
Everest, KS 66424

Robert D Hicks
P O Box 4
Everest, KS 66424

Betty J Hicks
P O Box 4
Everest, KS 66424

Robert D Hicks
420 E 8th St
Horton, KS 66439

Betty J Hicks
420 E 8th St
Horton, KS 66439

Parcel No. 34
Tax ID No. 1-02805
Parcel No. 36
Tax ID No. 1-02891

Robert A Becker
P O Box 123
Everest, KS 66424

Robert A Becker
321 E 9th St
Horton, KS 66439

Robert A Becker
125 E 8th St
Horton, KS 66439

Parcel No. 35
Tax ID No. 1-02856

REDEEMED

Parcel No. 36
Tax ID No. 1-02891

See Parcel No. 34

Parcel No. 37
Tax ID No. 1-02932

Diane C Tadlock
1701 Euclid Ave Apt 10
Horton, KS 66439

Diane C Tadlock
341 E 7th St
Horton, KS 66439

Parcel No. 38
Tax ID No. 1-02937

Marvin L Roberts
c/o David & Tracy Merz
P O Box 62
Everest, KS 66424

Novalene Roberts
c/o David & Tracy Merz
P O Box 62
Everest, KS 66424

Marvin L Roberts
c/o David & Tracy Merz
440 Locust St
Everest, KS 66424

Novalene Roberts
c/o David & Tracy Merz
440 Locust St
Everest, KS 66424

Marvin L Roberts
620 2nd Ave E
Horton, KS 66439

Novalene Roberts
620 2nd Ave E
Horton, KS 66439

Parcel No. 39
Tax ID No. 1-02953
Parcel No. 40
Tax ID No. 1-02954

David D Franzen
405 E 5th St
Horton, KS 66439

Teresa R Franzen
405 E 5th St
Horton, KS 66439

David D Franzen
104 3rd St
Rushville, MO 64484

Teresa R Franzen
104 3rd St
Rushville, MO 64484

David D Franzen
439 E 5th St
Horton, KS 66439

Teresa R Franzen
439 E 5th St
Horton, KS 66439

Parcel No. 41
Tax ID No. 1-02994

Erik Taylor
421 Chestnut
Leavenworth, KS 66048

Melissa Razo
421 Chestnut
Leavenworth, KS 66048

Erik Taylor
222 E 44th St
Horton, KS 66439

Melissa Razo
222 E 44th St
Horton, KS 66439

Parcel No. 42
Tax ID No. 1-02999

Leroy H Frakes
240 3rd St
Willis, KS 66434

Rose Y Frakes
240 3rd St
Willis, KS 66434

Leroy H Frakes
424 2nd Ave E
Horton, KS 66439

Rose Y Frakes
424 2nd Ave E
Horton, KS 66439

Parcel No. 43
Tax ID No. 1-03005

Johanna Lee Thomas
1111 Golden Eagle Rd
Horton, KS 66439

Johanna Lee Thomas
401 E 5th St
Horton, KS 66439

Parcel No. 44
Tax ID No. 1-03006

See Parcel No. 22

Parcel No. 45
Tax ID No. 1-0304601

Jayson Smith
328 W 14th St
Horton, KS 66439

Karen Smith
328 W 14th St
Horton, KS 66439

Parcel No. 46
Tax ID No. 1-03110

Lisa Drabek
210 W 13th St
Horton, KS 66439

Parcel No. 47
Tax ID No. 1-03122

Courtney R Coots
150 W 13th St
Horton, KS 66439

Parcel No. 48
Tax ID No. 1-03165

Justin Ferney
1109 2nd Ave E
Horton, KS 66439

Justin Ferney
1249 2nd Ave W
Horton, KS 66439

Parcel No. 49
Tax ID No. 1-03180

Ernest T McQueen
203 S Noyes Blvd Apt 2
St Joseph, MO 64501

Lena C McQueen
203 S Noyes Blvd Apt 2
St Joseph, MO 64501

Michael Mace
203 S Noyes Blvd Apt 2
St Joseph, MO 64501

Ernest T McQueen
1231 2nd Ave W
Horton, KS 66439

Lena C McQueen
1231 2nd Ave W
Horton, KS 66439

Michael Mace
1231 2nd Ave W
Horton, KS 66439

Parcel No. 50
Tax ID No. 1-03184

See Parcel No. 22

Parcel No. 51
Tax ID No. 1-03212

Jason Ross
433 W 12th St
Horton, KS 66439

Parcel No. 52
Tax ID No. 1-03213

See Parcel No. 22

Parcel No. 53
Tax ID No. 1-03214

W B Mellenbruch
c/o Marvin Stone
6116 50th St W
Meriden, KS 66512

W B Mellenbruch
460 W 11th St
Horton, KS 66439

Parcel No. 54
Tax ID No. 1-03227

Cecil R Bone Sr
318 S 5th St Lot 7
Sabetha, KS 66534

Lewis S Akers
318 S 5th St Lot 7
Sabetha, KS 66534

Cecil R Bone Sr
344 W 11th St
Horton, KS 66439

Lewis S Akers
344 W 11th St
Horton, KS 66439

Parcel No. 55
Tax ID No. 1-03232

Lyle F Kirlin
1109 2nd Ave W
Horton, KS 66439

Lyle F Kirlin
1115 2nd Ave W
Horton, KS 66439

Parcel No. 56
Tax ID No. 1-03291

Jianxun Mao
Caoyangwucun 156 #401
Shanghai, China 200062

Jianxun Mao
1041 2nd Ave W
Horton, KS 66439

Parcel No. 57
Tax ID No. 1-03319
Parcel No. 60
Tax ID No. 1-03351
Parcel No. 102
Tax ID No. 1-08163

Carol Weir
551 W 10th St
Horton, KS 66439

Carol Weir
1015 2nd Ave E
Horton, KS 66439

Carol Weir
550 W 9th St
Horton, KS 66439

Carol Weir
444 W 10th St
Horton, KS 66439

Parcel No. 58
Tax ID No. 1-03321

See Parcel No. 23

Parcel No. 59
Tax ID No. 1-03330

Tracy Peabody
12445 W 70th Pl
Arvada, CO 80004

Tracy Peabody
533 W 11th St
Horton, KS 66439

Parcel No. 60
Tax ID No. 1-03351

See Parcel No. 57

Parcel No. 61
Tax ID No. 103355

David L Smith
8883 Dickinson Rd
Effingham, KS 66023

David L Smith
929 4th Ave W
Horton, KS 66439

Parcel No. 62
Tax ID No. 1-03376

Pamela K Watkins
926 3rd Ave W
Horton, KS 66439

Parcel No. 63
Tax ID No. 1-03453

Cerena Lee Bone
c/o Tonya Roe
64 Juarado Ave
Veguita, NM 87062

Cerena Lee Bone
125 W 9th St
Horton, KS 66439

Parcel No. 64
Tax ID No. 1-03481

REDEEMED

Parcel No. 65
Tax ID No. 1-0353301

Arlyn Koehn
100 Oregon St
Hiawatha, KS 66434

Arlyn Koehn
2637 US 73 Hwy
Hiawatha, KS 66434

Parcel No. 66
Tax ID No. 1-03534
Parcel No. 67
Tax ID No. 1-03535

Christina Dupuis
436 W 8th St
Horton, KS 66439

Christina Dupuis
420 W 8th St
Horton, KS 66439

Parcel No. 68
Tax ID No. 1-04124

See Parcel No. 33

Parcel No. 69
Tax ID No. 1-04872

REDEEMED

Parcel No. 70
Tax ID No. 1-0498601

Larry E Fischer
2924 Goldfinch Rd
Hiawatha, KS 66434

Parcel No. 71
Tax ID No. 1-05012
Parcel No. 72
Tax ID No. 1-05013
Parcel No. 73
Tax ID No. 1-05014

REDEEMED

Parcel No. 74
Tax ID No. 1-0503002

Louise Lewis
3023 Montgall St
Kansas City, MO 64128

Parcel No. 75
Tax ID No. 1-0503003

Barbara Mathews
5215 Euclid St
Kansas City, MO 64130

Parcel No. 76
Tax ID No. 1-0503004

Betty Wagner
207 W Edgewood St
Springfield, MO 65807

Parcel No. 77
Tax ID No. 1-05321
Parcel No. 78
Tax ID No. 1-05322

Thomas R Doyle
523 S 7th St
Hiawatha, KS 66434

Kristie A Doyle
523 S 7th St
Hiawatha, KS 66434

Thomas R Doyle
525 S 7th St
Hiawatha, KS 66434

Kristie A Doyle
525 S 7th St
Hiawatha, KS 66434

Parcel No. 79
Tax ID No. 1-05544

John F Frayer
218 Center St
Powhattan, KS 66527

Debbie R Frayer
218 S Center St
Powhattan, KS 66527

Parcel No. 80
Tax ID No. 1-05700

Deborah A Georges
1706 Summerfield Dr Apt 7
Lebanon, TN 37087

Deborah A Georges
113 S Walnut St
Fairview, KS 66425

Parcel No. 81
Tax ID No. 1-07995

Harry A Pennington
P O Box 91
Robinson, KS 66532

Clara M Pennington
P O Box 91
Robinson, KS 66532

Harry A Pennington
215 State
Robinson, KS 66532

Clara M Pennington
215 State
Robinson, KS 66532

Harry A. Pennington
302 E. Iowa St.
Hiawatha, KS 66434

Clara M. Pennington
302 E. Iowa St.
Hiawatha, KS 66434

Parcel No. 82
Tax ID No. 1-05742

Roger Teske
114 W Front St
Fairview, KS 66425

Jane Teske
114 W Front St
Fairview, KS 66425

Roger Teske
314 S Sycamore
Fairview, KS 66425

Jane Teske
314 S Sycamore
Fairview, KS 66425

Parcel No. 83
Tax ID No. 1-06496
Parcel No. 84
Tax ID No. 1-06497
Parcel No. 86
Tax ID No. 1-06843

Ronald D Wenger
150th Bittersweet Rd
Hiawatha, KS 66434

Ronald D Wenger
246 145th St
Powhattan, KS 66527

Parcel No. 85
Tax ID No. 1-0675102

Gregory S Welch
1455 Kestral Rd
Hiawatha, KS 66434

Parcel No. 86
Tax ID No. 1-06843

See Parcel No. 86

Parcel No. 87
Tax ID No. 1-07522

REDEEMED

Parcel No. 88
Tax ID No. 1-07679
Parcel No. 89
Tax ID No. 1-07691

Forrest R Gaston II
610 Roxanna St
Morrill, KS 66515

Forrest R Gaston II
707 Virginia St
Morrill, KS 66515

Parcel No. 90
Tax ID No. 1-07692

Joseph W Gaston III
705 Virginia St
Morrill, KS 66515

Parcel No. 91
Tax ID No. 1-07718

Brian Crowson
2309 SE Alexander Dr
Topeka, KS 66605

Brian Crowson
502 Hanson St
Morrill, KS 66515

Parcel No. 92
Tax ID No. 1-07831

J C Torkelson
P O Box 188
Robinson, KS 66532

J C Torkelson
105 Main St
Robinson, KS 66532

Parcel No. 93
Tax ID No. 1-07930

Jordan Traxler
504 Goldengate St
Robinson, KS 66532

Jordan Traxler
410 Golden Gate
Robinson, KS 66532

Parcel No. 94
Tax ID No. 1-07932

REDEEMED

Parcel No. 95
Tax ID No. 1-07948
Parcel No. 96
Tax ID No. 1-07953

Kim J Brassfield-Backer
205 Main St
Robinson, KS 66532

Carolyn Artman
205 Main St
Robinson, KS 66532

Parcel No. 97
Tax ID No. 1-07977

Deanna M Pierson
P O Box 35
Pawnee, KS 66526

Deanna M Pierson
609 Parsons
Robinson, KS 66532

Parcel No. 98
Tax ID No. 1-08019

Savannah Gibson
811 Southview Ter
Pleasant Hill, MO 64080

Savannah Gibson
210 Main St
Robinson, KS 66532

Parcel No. 99
Tax ID No. 1-08045

Michael D Erdley
507 Main St
Robinson, KS 66532

Tressa J Erdley
507 Main St
Robinson, KS 66532

Parcel No. 100
Tax ID No. 1-08051
Parcel No. 101
Tax ID No. 1-08052

Kevin Fleagle
411 Main St
Robinson, KS 66532

Kim Fleagle
411 Main St
Robinson, KS 66532

Robert C Senn
411 Main St
Robinson, KS 66532

Kevin Fleagle
506 Parsons
Robinson, KS 66532

Kim Fleagle
506 Parsons
Robinson, KS 66532

Robert C Senn
506 Parsons
Robinson, KS 66532

Parcel No. 102
Tax ID No. 1-08163

See Parcel No. 57

Parcel No. 103
Tax ID No. 1-03181

Matthew S. Adams
1630 2nd Ave. W.
Horton, KS 66439

Bonnie Adams
1630 2nd Ave. W.
Horton, KS 66439

Matthew S. Adams
1239 2nd Ave.
Horton, KS 66439

Bonnie Adams
1239 2nd Ave.
Horton, KS 66439

Parcel No. 104
Tax ID No. 1-02936

Michael W. Blunt
321 E. 7th St.
Horton, KS 66439

Michael W. Blunt
624 2nd Ave. E
Horton, KS 66439

Parcel No. 105
Tax ID No. 1-03058

Peter Carter
c/o Judy J. Phillips
1371 Parrott Trace
Greensboro, GA 30642

Peter Carter
531 W. 15th St.
Horton, KS 66439

Parcel No. 106
Tax ID No. 1-03062
Parcel No. 107
Tax ID No. 1-03063

Dewey E. Coy
5702 S. 3rd St.
St. Joseph, MO 64504-1616

Janice Coy
5702 S. 3rd St.
St. Joseph, MO 64504-1616

Dewey E. Coy
1445 5th Ave. W
Horton, KS 66439

Janice Coy
1445 5th Ave. W
Horton, KS 66439

Parcel No. 108
Tax ID No. 1-02941

Joshua Darden
1223 Lane St.
Falls City, NE 68355

Joshua Darden
417 E. 7th St.
Horton, KS 66439

Parcel No. 109
Tax ID No. 1-02818

Robert Eiserman
100 Vermont Ave.
Holton, KS 66436

Robert Eiserman
334 E. 8th St.
Horton, KS 66439

Parcel No. 110
Tax ID No. 1-02957

Thomas H. Gardner
327 E. 6th St.
Horton, KS 66439

Michael Dean Horton
327 E. 6th St.
Horton, KS 66439

Parcel No. 111
Tax ID No. 1-03487
Parcel No. 112
Tax ID No. 1-0335301

Teresa Lee Hanley
555 Montrose Cres
Kamloops, B.C. V2B6A5
Canada

Teresa Lee Hanley
845 1st Ave. W
Horton, KS 66439

Teresa Lee Hanley
520 W. 9th St.
Horton, KS 66439

Parcel No. 113
Tax ID No. 1-02795

Judy R. Post
510 N. 9th St.
Hiawatha, KS 66434

Daniel R. Post
510 N. 9th St.
Hiawatha, KS 66434

Judy R. Post
434 E. 8th St.
Horton, KS 66439

Daniel R. Post
434 E. 8th St.
Horton, KS 66439

Parcel No. 114
Tax ID No. 1-00492

Daniel P. Alfrey, III
103 Seward St.
Wathena, KS 66090

Daniel P. Alfrey, III
913 Miami St.
Hiawatha, KS 66434

Centenary Alfrey
103 Seward St.
Wathena, KS 66090

Centenary Alfrey
913 Miami St.
Hiawatha, KS 66434

Parcel No. 115
Tax ID No. 1-03272

Allie E. Anderson
c/o Mildred Leafy
1116 Lake St.
Salt Lake City, UT 84105

Allie E. Anderson
1024 2nd Ave. W
Horton, KS 66439

Jamie Paul Shaffer
250 E. 7th St.
Horton, KS 66439

Leland Ray Leafly
c/o Mildred Leafly
116 Lake St.
Salt Lake City, UT 84105

Parcel No. 117
Tax ID No. 1-02951

Gene R. Zimmerman
405 Parallel St.
Atchison, KS 66002

Leeland Ray Leafly
1024 2nd Ave. W
Horton, KS 66439

Gene R. Zimmerman
437 E. 6th St.
Horton, KS 66439

Parcel No. 116
Tax ID No. 1-02878

COMES NOW Plaintiff and for its cause of action against Defendants alleges:

1. Plaintiff is a body politic and corporate and is a duly organized and existing county of the State of Kansas. Kansas statute expressly authorizes the institution of this proceeding to foreclose tax liens against real property in Brown County, Kansas. Said liens and real property are more specifically described in Exhibit "A" made a part hereof by reference.

2. All requirements of law pertaining to assessment, levy, taxation, publication and proof thereof, sale and purchase in the name of Brown County, Kansas, as prescribed by K.S.A. §79-2301 et seq., and every other legal condition precedent to judicial foreclosure of said tax liens, have been performed and satisfied. The taxes have not been paid as required by law, and all the within described real estate is subject to foreclosure and sale for delinquent taxes. As to certain real estate, Plaintiff may have valid liens for unpaid and delinquent personal property taxes which are also subject to foreclosure.

3. The caption of this Petition is incorporated herein and made a part hereof by reference. The persons named as Defendants therein are the owners and supposed owners, and persons having or claiming to have an interest in the lands described herein, so far as Plaintiff is able to ascertain, but the exact nature of such ownership and interest is unknown to Plaintiff.

4. Plaintiff further alleges that it has diligently inquired as to the residences and whereabouts of Defendants herein and, except as set forth in the caption hereof, is unable to state the residences and whereabouts of Defendants, and each of them, or whether any of them are dead, and, if they or any of them be dead, Plaintiff is unable to ascertain the names, residences, whereabouts and identity of the heirs, executors, administrators, devisees, trustees, conservators and assigns of such Defendants. Upon diligent inquiry, Plaintiff is unable to ascertain whether Defendant corporations named herein are domestic or foreign corporations, nor their legal status, nor whether they continue to have legal existence and officers, nor the names and whereabouts of the successors, trustees or assigns, if any, of such corporations as may be dissolved. All Defendants herein named, and those claiming under or through them, should be required to appear herein, so that all claims, estates, titles and interests may be determined by the decree of this Court and so that the tax lien therein to be foreclosed may be adjudged a good, valid and perfect first and prior lien upon each tract, lot or piece of real estate described herein, for the taxes, together with interest, charges, penalties and costs thereon.

5. Exhibit "A" is a schedule containing information pertinent to this proceeding and is attached hereto, incorporated herein and made a part hereof by reference. Each tract, lot and piece of real estate intended to be included in this foreclosure proceeding is described as a separate item upon Exhibit "A," and that each such tract described upon Exhibit "A" also carries a Tax Identification number by which it is identified in the files of the Brown County Treasurer and Brown County Clerk.

6. Lands described in Exhibit "A" are all in Brown County, Kansas. All of the descriptions used in Exhibit "A" are intended to indicate, with ordinary and reasonable certainty, the real estate intended to be included in this foreclosure proceeding.

7. Each item described upon Exhibit "A" is also subject to charges occasioned by this foreclosure proceeding and to an equitable portion of the costs of this proceeding to be fixed and determined by the Court herein.

8. Plaintiff's lien is for unpaid taxes on the real estate in question and is a first and prior lien to the liens and claims of all of Defendants herein, including the unknown members of the classes set forth in the case caption. Plaintiff is unable to allege in greater detail the nature or extent of the claims of any Defendants, and is unable to allege which, if any, Defendants may be dead, and which, if any of the corporate Defendants may be dissolved. In the event of such death or dissolution, Plaintiff is unable to allege the names of the heirs, executors, administrators, devisees, trustees, conservators and assigns, if any, of the decedent or the successors, trustees, and assigns of any dissolved corporation or the whereabouts of any of said persons, except as alleged herein. Plaintiff respectfully requests that each Defendant, and those claiming under or through any Defendants herein, be required to appear in this cause and to assert what interest, if any, they or any of them have or claim to have in and to any of the real estate described herein so that all claims, estates, interest and titles may be determined by the decrees of this Court and so that Plaintiff's tax lien herein may be foreclosed against each parcel listed on Exhibit "A" and adjudged to be a good, valid and perfect first and prior lien upon each parcel.

9. Plaintiff is entitled to a decree of this Court determining the amount of taxes, charges, interest and penalties chargeable to each particular tract, lot and piece of real estate in such amount as the Court shall determine, and to judgment for costs herein equitably apportioned against each tract, lot and piece of real estate and to judgment for charges herein, and for judgment determining the owner or parties having an interest herein, and to a decree adjudging the amount so found to be due to be a first and prior lien upon each item of real estate described

in Exhibit “A” and for an order directing that each item of real estate described upon Exhibit “A” be sold at public sale for the satisfaction of each lien and for other necessary relief.

WHEREFORE, Plaintiff prays that the Court determine the amount of taxes, charges, interest and penalties chargeable to each particular tract, lot or piece of real estate described herein; the name of the owner or party having an interest therein and that the Court adjudge and decree the amount due to be a first and prior lien upon the real estate; that each Defendant be required to appear and establish their claim, estate, title or interest in said property; and that the same be sold at public sale for the satisfaction of the lien, costs, charges and expenses of the proceedings and sale and for other necessary relief.

/s/ Michelle L. Brenwald

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