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**IN THE TWENTY-FIRST JUDICIAL DISTRICT
DISTRICT COURT OF CLAY COUNTY, KANSAS
CIVIL DEPARTMENT**

THE BOARD OF COUNTY COMMISSIONERS)
OF THE COUNTY OF CLAY, KANSAS,)
Plaintiff,)
)
Vs.) Case No. CY-2026-CV-000007
)
RICHARD ALDRICH, ET AL,)
Defendants.)
PURSUANT TO CHAPTER 60 AND 79 OF
KANSAS STATUTE ANNOTATED

AMENDED PETITION

Parcel No. 1
Tax ID No. 205210200401200001

Richard Aldrich
307 Weda
Longford, KS 67458-2511

Richard Aldrich
117 Main
Longford, KS 67458

Richard Aldrich
PO Box 183
Longford, KS 67458-0183

Parcel No. 2
Tax ID No. 103080202800800001
Parcel No. 3
Tax ID No. 198340000000200001

REDEEMED

Parcel No. 4
Tax ID No. 139290200400300001

William Crichton
480 Pearl
Oak Hill, KS 67432

Credit Acceptance Corporation
c/o Brandon York
9140 Ward Parkway, St. 200
Kansas City, MO 64114

Parcel No. 5

Tax ID No. 103080201300300001

Crystal Dalsing
518 Dexter
Clay Center, KS 67432

Garry Elstun
518 Dexter
Clay Center, KS 67432

Garry Elstun
4717 Canterbury Ln.
Lincoln, NE 68512

Mike Strong, Inc. dba Mike's TV
c/o Garrett T. Holmes
445 N. Waco
Wichita, KS 67202

Mike Strong, Inc.
124 W. 2nd Ave.
Hutchinson, KS 67501

Mike Strong, Inc.
c/o Jerry Ricksecker, Res. Agt.
20 Compound Dr.
Hutchinson, KS 67502

Manhattan Radiology, LLP
c/o Dana Manweiler Milby
P.O. Box 1030
Wichita, KS 67201

Manhattan Radiology, LLP
As Resident Agent
1133 College Ave., C143
Manhattan, KS 66502

Clay Center Family Physicians
c/o Noelle Ralph, Attorney
3505 N. Topeka St.
Wichita, KS 67219

Parcel No. 6

Tax ID No. 103060401300900001

REDEEMED

Parcel No. 7

Tax ID No. 103080101700700001

Parcel No. 8

Tax ID No. 103080101700600001

Parcel No. 9

Tax ID No. 103050202900200001

Parcel No. 10

Tax ID No. 103080200401000001

REDEEMED

Parcel No. 11

Tax ID No. 103080301400200001

Chris Jordan
113 S 4th St
Clay Center, KS 67432

Chris Jordan
401 Bridge
Clay Center, KS 67432

DAG Financial Trust 2002-A
c/o James M. McNeile
4601 College Blvd., Ste. 200
Leawood, KS 66211
Barbara J. Dodd, Deceased

Unknown heirs of Barbara J. Dodd,
Deceased
Address Unknown

Bonnie Wohler
Heir of Barbara J. Dodd
3545 Eagle Pass Ct., A
Lawrence, KS 66049

Connie Jordan
Heir of Barbara J. Dodd
425 Boulder St.
Lawrence, KS 66049

Kansas Department of Revenue
P.O. Box 12005
Topeka, KS 66612-2005

Parcel No. 12
Tax ID No. 169310000000600001

Sara Collins Medina
706 10th St
Wakefield, KS 67487

Sara Collins Medina
c/o Pablo Carvajal-Salas
706 10th St.
Wakefield, KS 67487

Parcel No. 13
Tax ID No. 103080101501200001
Parcel No. 14
Tax ID No. 103050202800300001

REDEEMED

Parcel No. 15
Tax ID No. 103080202801600001

Susan J Robinson
1408 W Lotus St
Wichita, KS 67213-3431

Susan J Robinson
735 Clay
Clay Center, KS 67432

Susan J. Robinson, Deceased

Unknown Heirs of Susan J. Robinson,
Deceased
Addresses Unknown

Ernest Thompson
1408 W. Lotus St.
Wichita, KS 67213-3431

Tracie Thompson
1408 W. Lotus St.
Wichita, KS 67213-3431

Kansas Department of Revenue
P.O. Box 12005
Topeka, KS 66612-2005

Parcel No. 16
Tax ID No. 119320000000100001

Parcel No. 17
Tax ID No. 118330000000300001

Parcel No. 18
Tax ID No. 114200000000800001

Parcel No. 19
Tax ID No. 122090000000200001

Parcel No. 20
Tax ID No. 117350000000400001
Parcel No. 21
Tax ID No. 103080102201300001

REDEEMED

Parcel No. 22
Tax ID No. 139290200400200001

Mark E Virden
6991 County Road 210
Union Star, MO 64494-8175

Mark E Virden
440 Pearl
Oak Hill, KS 67432

Parcel No. 23
Tax ID No. 197350401300500001

REDEEMED

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 Clay 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 Clay 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 Clay County Treasurer and Clay County Clerk.

6. Lands described in Exhibit "A" are all in Clay 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
Michelle L. Brenwald #19287
Christopher A. McElgunn #13359
KLEND AUSTERMAN LLC
301 N. Main, Ste. 1600
Wichita, KS 67202
Telephone: 316/267-0331
Facsimile: 316/267-0333
cmcelgunn@KlendaLaw.com
mbrenwald@KlendaLaw.com

EXHIBIT A

(All amounts shown are estimates at the time of filing. Please contact the County Treasurer for exact amount owed.)

Parcel No. 1

Tax ID No. 205210200401200001

Legal Description: ORIG TOWN LONGFORD, S21, T10, R01E, BLOCK 6, Lot 17 - 18, Clay County, Kansas

Approximate Address: 117 MAIN, LONGFORD, KS 67458

Delinquent Years: 2021 - 2025; **Redemption Costs:** \$1,775.58

Current Owners: ALDRICH, RICHARD

Parcel No. 2

Tax ID No. 103080202800800001

REDEEMED

Parcel No. 3

Tax ID No. 198340000000200001

REDEEMED

Parcel No. 4

Tax ID No. 139290200400300001

Legal Description: WENDTS 2ND ADD OAKHL, S29, T09, R01E, BLOCK 2, Lot 1 - 2, Clay County, Kansas

Approximate Address: 480 PEARL, OAK HILL, KS 67432

Delinquent Years: 2021 - 2025; **Redemption Costs:** \$1,942.17

Current Owners: CRICHTON, WILLIAM

Parcel No. 5

Tax ID No. 103080201300300001

Legal Description: ORIG TOWN CLAY CENTER, S08, T08, R03E, BLOCK 30, W 4 LOT 5 & E 36 LOT 6, Clay County, Kansas

Approximate Address: 518 DEXTER, CLAY CENTER, KS 67432

Delinquent Years: 2021-2025; **Redemption Costs:** \$5,488.08

Current Owners: DALSING, CRYSTAL

Parcel No. 6

Tax ID No. 103060401300900001

REDEEMED

Parcel No. 7

Tax ID No. 103080101700700001

REDEEMED

EXHIBIT A

(All amounts shown are estimates at the time of filing. Please contact the County Treasurer for exact amount owed.)

Parcel No. 8

Tax ID No. 103080101700600001

REDEEMED

Parcel No. 9

Tax ID No. 103050202900200001

REDEEMED

Parcel No. 10

Tax ID No. 103080200401000001

REDEEMED

Parcel No. 11

Tax ID No. 103080301400200001

Legal Description: ORIG TOWN CLAY CENTER, S08, T08, R03E, BLOCK 72, Lot 11 - 12, Clay County, Kansas

Approximate Address: 401 BRIDGE, CLAY CENTER, KS 67432

Delinquent Years: 2021-2025; **Redemption Costs:** \$4,394.87

Current Owners: JORDAN, CHRIS

Parcel No. 12

Tax ID No. 169310000000600001

Legal Description: TOWNSITE ADD #1 WAKEF, S31, T09, R04E, TR BEG 130 W OF SE COR LOT 1 BLK 17 WAKEFIELD TOWNSITE ADD NO 1 W 124 N 140 E 124 S TO POB, Clay County, Kansas

Approximate Address: 706 10TH ST, WAKEFIELD, KS 67487

Delinquent Years: 2021-2025; **Redemption Costs:** \$13,471.54

Current Owners: MEDINA, SARA COLLINS

Parcel No. 13

Tax ID No. 103080101501200001

Legal Description: KURTZES 1ST ADD, S08, T08, R03E, BLOCK 1, E 23 LOT 17 & ALL LOT 18, Clay County, Kansas

Approximate Address: 929 COURT, Clay Center, KS 67432

Delinquent Years: 2021-2025; **Redemption Costs:** \$7,092.52

Current Owners: NELSON, DORIN DANE

Parcel No. 14

Tax ID No. 103050202800300001

REDEEMED

EXHIBIT A

(All amounts shown are estimates at the time of filing. Please contact the County Treasurer for exact amount owed.)

Parcel No. 15

Tax ID No. 103080202801600001

Legal Description: LOTS 19 & 20, BLOCK 48 ORIGINAL TOWN, Clay County, Kansas

Approximate Address: 735 CLAY, CLAY CENTER, KS 67432

Delinquent Years: 2021-2025; **Redemption Costs:** \$3,866.08

Current Owners: ROBINSON, SUSAN J

Parcel No. 16

Tax ID No. 119320000000100001

REDEEMED

Parcel No. 17

Tax ID No. 118330000000300001

REDEEMED

Parcel No. 18

Tax ID No. 114200000000800001

REDEEMED

Parcel No. 19

Tax ID No. 122090000000200001

REDEEMED

Parcel No. 20

Tax ID No. 117350000000400001

REDEEMED

Parcel No. 21

Tax ID No. 103080102201300001

REDEEMED

Parcel No. 22

Tax ID No. 139290200400200001

Legal Description: WENDTS 2ND ADD OAKHL, S29, T09, R01E, BLOCK 2, Lot 3 - 4, Clay County, Kansas

Approximate Address: 440 PEARL, OAK HILL, KS 67432

Delinquent Years: 2021-2025; **Redemption Costs:** \$921.36

Current Owners: VIRDEN, MARK E

EXHIBIT A

(All amounts shown are estimates at the time of filing. Please contact the County Treasurer for exact amount owed.)

Parcel No. 23

Tax ID No. 197350401300500001

REDEEMED