

IN THE TENNESSEE CHANCERY COURT
FOR THE TWENTIETH JUDICIAL DISTRICT
AT NASHVILLE

FAMILY TRUST SERVICES, LLC, and
BILLY GREGORY, on behalf of themselves
and those similarly situated,

Plaintiffs,

v.

REO HOLDINGS, LLC; CHARLES E.
WALKER; JON PAUL JOHNSON; JULIE
COONE; and MERDAN IBRAHIM,

Defendants.

Case No. 15-780-TV

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JUDICIAL DISTRICT
CHANCERY CT.
DC&M

CLASS ACTION COMPLAINT

The plaintiffs, Family Trust Services, LLC and Billy Gregory, file this Complaint against defendants REO Holdings, LLC, Charles E. Walker, Jon Paul Johnson, Julie Coone, and Merdan Ibrahim to recover injunctive and declaratory relief, compensatory and punitive damages, and other appropriate relief, as a result of defendants' fraud, conspiracy to commit fraud, racketeering, violation of the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1964, and violation of other statutory and common law rights of plaintiffs and members of the putative class, all arising out of Defendants' operation of a criminal enterprise in connection with property tax sales across the State of Tennessee over a period of at least five (5) years.

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A. INTRODUCTION

1. This case involves systematic fraud in the use of the tax-sale and redemption process for real property set in Tennessee Code Title 67, Chapter 5, Parts 25 and 27.
2. Defendants REO Holdings, LLC, Charles E. Walker, Jon Paul Johnson, Julie Coone, and Merdan Ibrahim have operated a criminal enterprise directed at obtaining title to real property and obtaining money in exchange for real property or upon mortgage of real property, based upon forged and pretended deeds and other muniments of title.
3. Certain examples of the Defendants' wrongdoing are set out in detail in this complaint, but, upon information and belief, the criminal enterprise described herein extends far beyond the specific cases described.
4. The Defendants' general modus operandi consists first of identifying, from among properties that have been sold in satisfaction of unpaid real property taxes, properties with absentee owners or owners otherwise unlikely to investigate or assert their interests. Then, if necessary, the Defendants create false instruments, such as affidavits of heirship, that identify certain persons as having interests in the real property in question; the Defendants append forged signatures and notary acknowledgements to these documents. The Defendants then create false deeds, again appending forged signatures and notary acknowledgements. On the basis of these instruments and the pretended title they convey, the Defendants commence redemption processes on the respective properties. In many instances, the Defendants obtain decrees of redemption purporting to vest title to the redeemed properties in them as a result of this course of conduct.

5. In the course of this process, the Defendants electronically or photostatically copy the signatures and stamps of various notaries public—from Tennessee and other States throughout the Union—from previously recorded instruments and then append these images to the false documents they create to support their redemption claims.

6. By way of illustration, defendants forged signatures or notary acknowledgements, or both, on the following eleven (11) documents:

Complaint Ex.	Document	Grantee	Putative Date	Notary
1.D	Quitclaim Deed	REO	3/28/2015	Julie Coone
2.E	Quitclaim Deed	REO	10/22/2014	"Jennifer Clark"
3.B	Quitclaim Deed	REO	2/24/2015	"Frances J. Nord"
4.C	Quitclaim Deed	Howard Bottoms	10/5/2010	"Karen D. Norman"
5.B	Affidavit of Heirship	N/A	3/27/2015	Jon Paul Johnson
5.C	Quitclaim Deed	REO	3/27/2015	Jon Paul Johnson
6.B	Affidavit of Heirship	N/A	5/27/2015	"Mary J. Sims"
6.D	Quitclaim Deed	REO	5/27/2015	"Mary J. Sims"
7.A	Quitclaim Deed	REO	6/2/2015	"Danita Toone"
8.B	Affidavit of Heirship	N/A	5/27/2015	"Jesse Berber"
8.C	Quitclaim Deed	REO	5/28/2015	"Jesse Berber"

7. Assorted notaries (including notaries Clark, Nord, Norman, Sims, Toone, and Berber) whose acknowledgments appear on instruments presented for recording by the Defendants, however, have confirmed that they never signed, stamped, or took any acknowledgment of the Defendants' instrument purporting to have been signed and stamped by them.

8. One out-of-state notary was so appalled at the flagrancy of the Defendants' fraud that, when presented with the Defendants' instrument purporting to bear her stamp and signature, she immediately contacted the Davidson County District Attorney.

9. In some cases, instead of copying and pasting signatures and stamps of bargainors and notaries, the Defendants simply create instruments in which the bargainor claims to own an interest in property that he does not, in fact, own. These instruments rely upon misrepresentations of identity: the named bargainor under the instrument created by the Defendants, or a party from whom that bargainor received some interest in *other* property, has a name similar to that of the true owner (or deceased immediately previous owner) of the property the Defendants seek to obtain. The case of the Chambers Property, described *infra*, is an example of this technique. Some such instruments, although champertous and containing numerous false claims and statements, may, in fact, have been executed by persons other than the Defendants. Others are simple forgeries.

10. The Defendants have engaged in such acts across the State of Tennessee, perpetrating an ongoing and continuous fraud upon the courts and their clerks, the registers of deeds, property owners, legitimate purchasers at tax sales, and the public as a whole.

11. This scheme has entailed systematic abuse of and perjury related to the automated remote-recording mechanisms operated by certain registers of deeds. Defendant Charles E. Walker, for example, executed under oath and recorded a “True Copy Certification” or “Certificate of Authenticity” certifying as authentic each of the following forged or otherwise false instruments:

Complaint Ex.	False Instrument	Date Recorded
2.D	Quitclaim Deed	10/10/2014
2.E	Quitclaim Deed	10/23/2014
3.B	Quitclaim Deed	2/26/2015
4.C	Quitclaim Deed	1/12/2015
6.B	Affidavit of Heirship	6/10/2015
6.D	Quitclaim Deed	6/10/2015

7.A	Quitclaim Deed	6/15/2015
8.B	Affidavit of Heirship	6/2/2015
8.C	Quitclaim Deed	6/2/2015

Each of Defendant Walker's signatures on these bogus certificates of authenticity was notarized by either Defendant Jon Paul Johnson or Defendant Julie Coone.

12. The Defendants practiced the fraud and forgery and operated the criminal enterprise alleged herein for the purpose, and with the effect, of concealing their wrongdoing. The Plaintiffs discovered each of the wrongful acts described herein less than a year prior to the commencement of this action.

B. PARTIES, JURISDICTION, & VENUE

13. The plaintiff Family Trust Services, LLC, (hereinafter "FTS") is a limited liability company organized pursuant to the laws of the State of Tennessee and having its principal place of business in Williamson County.

14. The plaintiff Billy Gregory is a citizen and resident of Davidson County, Tennessee.

15. The Defendant REO Holdings, LLC, (hereinafter "REO") is a limited liability company organized pursuant to the laws of the State of Tennessee and ostensibly having its principal place of business in Owensboro, Kentucky.

16. The Defendant Charles E. Walker ("Walker") is a citizen of the State of Tennessee residing in Davidson County. Mr. Walker does business as Walker Law Offices and maintains an office at 69 Thompson Lane, Nashville, Tennessee 37211. Walker is an attorney who, at all times relevant hereto, is and has been licensed to practice law in Tennessee.

17. The Defendant Jon Paul Johnson is a citizen of the State of Tennessee residing in Davidson County.

18. The Defendant Julie Coone is a citizen of the State of Tennessee residing in Dickson County.

19. The Defendant Merdan Ibrahim is a citizen of the State of Tennessee residing in Davidson County. Defendant Ibrahim is a member of REO.

20. This Court has jurisdiction over this matter pursuant to Tennessee Code Annotated §§ 16-11-101-115.

21. Venue is proper in this judicial district and county pursuant to Tennessee Code Annotated § 20-4-101 et seq. in that, inter alia, the events giving rise to the claims occurred in Davidson County, Tennessee, and the Defendant Charles Walker resides and is to be found in that County.

C. PROPERTY TAX SALES

1. The Moore Property

22. On or about October 22, 1997, Jack Moore and his wife, Karen, accepted a warranty deed to three contiguous tracts of real property situated in Maury County, Tennessee, and identified on a recorded plat as Tracts 1, 2, and 3 of Harlan Acres and Tract 1 of Armour Acres. That plat is found in the records of the Maury County Register of Deeds at Book P13, Page 238. A true and accurate copy thereof is attached hereto as **Exhibit 1.A** and incorporated herein by reference. (The aforementioned property is hereinafter referred to as the "Moore Property.") The deed by which Mr. and Mrs. Moore acquired the Moore Property is found in the records of the Maury County Register of Deeds at Book 1350, Page 93.

23. On March 12, 2000, Karen Moore executed a quitclaim deed severing the tenancy by the entireties as to the Moore Property and conveying her interest therein, along with her interest in other properties, to Jack Moore as a sole owner. A true and accurate copy of that quitclaim

deed—which is found in the records of the Maury County Register of Deeds—is attached hereto as **Exhibit 1.B** and incorporated herein by reference.

24. Subsequently, on or about April 2, 2013, the State of Tennessee, on its own behalf and on behalf of Maury County, commenced an action in the Tennessee Chancery Court for the Twenty-Second Judicial District against Mr. Moore and others as a result of their failure to remit real property taxes. Among the real property taxes that had gone unpaid and that the State sought to collect were those for the Moore Property. The action was entitled *State of Tennessee v. The Following Delinquent Taxpayers as Shown on the 2011 Real Property Delinquent Tax Records of Maury County Tennessee*, No. 13-169 DT.

25. On March 20, 2014, in the course of the proceedings in action No. 13-169 DT, the Moore Property was sold to satisfy the delinquent taxes that had accrued against it. A final decree confirming that sale entered on March 28, 2014.

26. REO filed a Motion and Notice to redeem the Moore Property on March 30, 2015. A true and accurate copy of REO's Motion and Notice is attached hereto as **Exhibit 1.C** and incorporated herein by reference. REO's Motion and Notice recites that it "obtained the right of redemption by deed dated 3-28-15, Book R2313 Page 919-920 Maury County Register of Deeds."

27. The deed found in the records of the Maury County Register of Deeds at Book R2313, Pages 919-20, is a quitclaim deed purporting to convey three of the four constituent tracts shown on the plat of the Moore Property from Jack Moore to REO Holdings. A true and accurate copy of that quitclaim deed is attached hereto as **Exhibit 1.D** and incorporated herein by reference. (This deed is hereinafter referred to as the "Moore Quitclaim.")

28. REO Holdings subsequently recorded a scrivener's affidavit in which Defendant Charles Walker stated that the last constituent tract shown on the plat of the Moore Property should have been included on the Moore Quitclaim but was omitted by mistake. A true and accurate copy of this scrivener's affidavit is attached hereto as **Exhibit 1.E** and incorporated herein by reference. (This instrument is hereinafter referred to as the "Moore Affidavit.")

29. The aforementioned Jack Moore, however, did not execute the Moore Quitclaim. Mr. Moore's purported signature on that document is notarized by a Tennessee notary public by the name of Julie Coone, but Mr. Moore was not in the State of Tennessee on March 28 and has never executed any instrument of conveyance to REO. The signature appearing on the Moore Quitclaim is, in short, a forgery.

30. Accordingly, REO had no right to redeem the Moore Property, and by recording a false instrument of conveyance and relying upon it to redeem that property, REO, with Mr. Walker's assistance and connivance, has deprived Mr. Moore and his successors, heirs, and assigns of the opportunity to redeem or otherwise to claim and derive benefit from Mr. Moore's interest in said property.

2. The Chambers Property

31. On or about February 21, 1942, Maggie Chambers accepted a quitclaim deed giving her title in fee simple absolute to real property situated in Davidson County, Tennessee, and identified on a recorded plan as Part of Lot 29 in Owen's Buena Vista Plan of Lots, as of record in Book 57, Page 26, in the office of the Register of Deeds for Davidson County, and commonly known as 2131 11th Avenue North, Nashville. A true and correct copy of this deed is attached hereto as **Exhibit 2.A** (The property conveyed by the aforementioned deed is hereinafter referred to as the "Chambers Property.")

32. The aforementioned Maggie Chambers executed a last will and testament on or about July 23, 1963. Her will expressly references and makes a specific devise of the Chambers Property. Following Mrs. Chambers' death on or about December 17, 1971, her 1963 will was probated in Davidson County. A true and accurate copy of said will, as it appears in the records of the Davidson County Probate Clerk, is attached hereto as **Exhibit 2.B** and incorporated herein by reference. (This will is hereinafter referred to as the "1963 Will.")

33. The 1963 Will devised a life estate in the Chambers Property to one of Mrs. Chambers' children, with the remainder to the remaining five, albeit not in equal shares.

34. In 2013, the Metropolitan Government of Nashville and Davidson County commenced an action in the Tennessee Chancery Court for the Twentieth Judicial District against Mrs. Chambers' heirs and estate and others as a result of their failure to remit real property taxes. Among the real property taxes that had gone unpaid and that the Metropolitan Government sought to collect were those for the Chambers Property. The action is entitled *The Metropolitan Government of Nashville and Davidson County v. Delinquent Taxpayers as Shown on the 2011 Real Property Tax Records of the Metropolitan Government of Nashville and Davidson County, Tennessee*, No. 13-299-II.

35. In the course of the proceedings in action No. 13-299-II, the Chambers Property was sold to satisfy the delinquent taxes that had accrued against it on November 20, 2013. A final decree confirming that sale entered on January 9, 2014.

36. Mr. Walker subsequently, on August 22, 2014, commenced a redemption of the Chambers Property in the name of the "Estate and Heirs of Chambers, Maggie, by and through Charles Walker, Attorney." A decree of redemption was entered on October 7, 2014, confirming that redemption. A true and accurate copy of the copy of that decree as it appears, together with

the related Notice of Redemption Process, in the records of the Register of Deeds for Davidson County, is attached hereto as **Exhibit 2.C** and incorporated herein by reference. (The documents comprising this exhibit are referred to hereinafter as the "Chambers Decree.")

37. On October 10, 2014, a quitclaim deed was presented to the Davidson County Register of Deeds for registration. The quitclaim deeds purports to have been executed on October 10, 2014, by Dorothy M. Fyke (née Luffine), trustee, and purports to convey the Chambers Property to REO. The quitclaim deed contains a footnoted derivation clause (but no call for the footnote) citing to the will found in the Probate Clerk's records at Will Book 88, Page 448. A true and accurate copy of this quitclaim deed is attached hereto as **Exhibit 2.D** and incorporated herein by reference. (This instrument is hereinafter referred to as the "October 10 Quitclaim.")

38. On October 23, 2014, a quitclaim deed was presented to the Davidson County Register of Deeds for registration. The quitclaim deed purports to have been executed on October 22, 2014, by Alice Marie Smith (née Williams) and purports to convey the Chambers Property to REO. The quitclaim deed contains a derivation clause citing to the will found in the Probate Clerk's records at Will Book 88, Page 448. A true and accurate copy of this quitclaim deeds is attached hereto as **Exhibit 2.E** and incorporated herein by reference. (This instrument is hereinafter referred to as the "October 22 Quitclaim.")

39. The will found at Will Book 88, page 448, was indeed executed by a woman named Maggie Chambers, and she did appoint therein Dorothy Luffine as trustee for Alice Williams and convey to said Dorothy Luffine, trustee, real property situated in Davidson County. But that real property is not the Chambers Property, and that testator is not the woman heretofore referred to as the owner of the Chambers Property. A true and accurate copy of the will found at Will Book

88, Page 448, is attached hereto as **Exhibit 2.F** and incorporated herein by reference. (Said will is hereinafter referred to as the "1967 Will.")

40. As can be seen from the 1967 Will, it was not executed by the same individual who executed the 1963 Will and it does not indicate (as the 1963 Will does) that the testator owns any interest in the Chambers Property. The October 10 Quitclaim conveys no interest to the Chambers Property, because it was executed by a woman who bore no relation to the one-time owner of the Chambers Property. The aforementioned redemption of the Chambers Property was, accordingly, falsely and fraudulently effected. The Defendants knew the redemption to be false and the October 10 Quitclaim and October 22 Quitclaim to convey no interest in the Chambers Property, as evidenced by their naming of the true heirs of the Chambers Property's one-time owner in the subsequently filed quiet title action, *REO Holdings, LLC, v. Thomas Chambers et al.*, No. 15-30-III in this Court. A true and accurate copy of the complaint in this action is attached hereto as **Exhibit 2.G** and incorporated herein by reference.

41. Moreover, the October 22 Quitclaim is itself a forgery, in addition to being champertous; the notarization of Jennifer Clark that it purports to bear is false and has been appended to the document by electronic or photostatic means.

3. The Augustine Property

42. On or about November 30, 2006, Annamma Augustine accepted a warranty deed to certain real property situated in Davidson County known as Lots 93 and 94 of the plan of Springdale Subdivision, as shown on a map of record in Plat Book 974, Page 18, the office of the Register of Deeds for Davidson County. A true and accurate copy of this warranty deed is attached hereto as **Exhibit 3.A** and incorporated herein by reference.

43. The aforementioned Lot 93 was subsequently foreclosed upon and sold pursuant to a deed of trust in 2012. (The aforementioned Lot 94 is hereinafter referred to as the "Augustine Property.")

44. In 2013, the Metropolitan Government of Nashville and Davidson County commenced an action in the Tennessee Chancery Court for the Twentieth Judicial District against Miss Augustine as a result of her failure to remit real property taxes accrued against the Augustine Property. Miss Augustine is a named defendant in the case No. 13-299-II referred to in Paragraph 34.

45. On January 22, 2014, in the course of the proceedings in action No. 13-299-II, the Augustine Property was sold to satisfy the delinquent taxes that had accrued against it. A final decree confirming that sale entered on February 28, 2014.

46. On February 26, 2015, a quitclaim deed was presented to the Davidson County Register of Deeds for recording. The quitclaim deed purports to convey the Augustine Property from Annamma K. Augustine to REO. (This instrument is hereinafter referred to as the "Augustine Quitclaim.") A true and accurate copy of the Augustine Quitclaim is attached hereto as **Exhibit 3.B** and incorporated herein by reference.

47. On the basis of the title purportedly conveyed by the Augustine Quitclaim, REO commenced a redemption of the Augustine Property on February 27, 2015. REO subsequently withdrew this redemption in April 2015.

48. The Augustine Quitclaim Deed, however, is a forgery. It purports to have been acknowledged before Frances J. Nord, a California notary public, on February 24, 2015. Frances J. Nord, however, did not notarize the Augustine Quitclaim on February 24, 2015, or at any other time. Indeed, the notarization found on the Augustine Quitclaim does not comply with the

requirements of California law in effect on February 24, 2015, as it omits the notice required by 2014 California Legislative Service Chapter 197, *codified at* Cal. Civ. Code § 1195, Cal. Gov. Code § 8202. Accordingly, REO obtained no title to the Augustine Property by virtue of the Augustine Quitclaim and was not a person entitled to redeem the Augustine Property on February 27, 2015, when it tendered funds for that purpose.

4. The Bottoms Property

49. Vernon Irene Bottoms acquired certain real property situated in Davidson County and commonly known as 3503 Mays Street pursuant to the will of her mother, Rebecca Jane Patterson, some time prior to March 25, 1999. The property (which is hereinafter referred to as the “Bottoms Property”) is more fully described in a warranty deed found in the records of the Davidson County Register of Deeds as instrument number 20150202-0009332.

50. On or about September 17, 2009, Vernon Irene Bottoms died testate, devising the Bottoms Property in trust to David Bottoms, her grandson, for the benefit of her granddaughter, Lani Jade Bottoms. Vernon Bottom’s will was subsequently recorded with the Register of Deeds for Davidson County, among whose records it may be found as instrument number 20100831-0068981. A true and accurate copy of that will is attached hereto as **Exhibit 4.A** and incorporated herein by reference. The will was probated in the Circuit Court for the Twentieth Judicial District in Case No. 10P-1375.

51. Following the death of Vernon Bottoms, if not before, the real property taxes that accrued against the Bottoms Property went unpaid. As a result, the Metropolitan Government of Nashville and Davidson County named Vernon Bottoms’ son, Howard Bottoms, and others as defendants in a tax-enforcement proceeding. *The Metropolitan Government of Nashville and Davidson County v. Delinquent Taxpayers on the 2010 Real Property Tax Records of the Metropolitan Government of Nashville and Davidson County, Tennessee*, No. 12-368-I, in the

Tennessee Chancery Court for the Twentieth Judicial District. This action sought to collect the unpaid property taxes that had accrued against the Bottoms Property.

52. The Bottoms Property was sold on June 19, 2013, to one Terrell Starks pursuant to proceedings had in Case No. 12-368-I. A final decree confirming that sale was entered on August 23, 2013.

53. On August 21, 2014, Mr. Walker tendered funds to the Davidson County Clerk and Master to commence the redemption of the Bottoms Property. A decree for redemption subsequently entered on December 18, 2014, in favor of "[Howard Bottoms] et al., by and through Charles Walker, attorney." This decree for redemption was submitted to the Davidson County Register of Deeds for recording on January 12, 2015. A true and accurate copy of that decree and the related Notice of Redemption Process, as they both appear in the records of the Davidson County Register of Deeds, is attached hereto as **Exhibit 4.B** and incorporated herein by reference.

54. Also on January 12, 2015, Mr. Walker submitted a quitclaim deed to the Davidson County Register of Deeds for recording. The quitclaim deed purports to have been executed on October 5, 2010, by David Bottoms, executor and guardian, and purports to convey the Bottoms Property to Howard Bottoms. A true and accurate copy of this deed (which is hereinafter referred to as the "David Bottoms Quitclaim") is attached hereto as **Exhibit 4.C** and incorporated herein by reference. The Bottoms Quitclaim was purportedly acknowledged to and notarized by Karen D. Norman, a Davidson County notary public.

55. Also on January 12, 2015, Mr. Walker submitted a warranty deed to the Davidson County Register of Deeds for recording. The deed purports to have been executed on March 27, 2014, by Howard Bottoms and purports to convey the Bottoms Property to REO. A true and

accurate copy of this deed (which is hereinafter referred to as the "Howard Bottoms Deed") is attached hereto as **Exhibit 4.D** and incorporated herein by reference. The Howard Bottoms Deed bears a derivation clause citing to an affidavit of heirship on record with the Davidson County Register of Deeds as instrument number 20100729-0059354 and identifying Howard Bottoms as the sole heir of Vernon Bottoms and the owner of the Bottoms Property via intestate succession. REO subsequently purported to convey the Bottoms Property to Eastland Avenue Real Estate, LLC, in exchange for money and other consideration.

56. The David Bottoms Quitclaim is a forgery. David Bottoms did not execute that instrument on or about October 5, 2010, or at any other time. Nor was it acknowledged before, signed, or stamped by Karen D. Norman, who was an employee of Baker, Donelson, Bearman, Caldwell & Berkowitz, PC, at the time. Her stamp and signature, like the signature of David Bottoms, were copied via electronic or photostatic means and affixed in a similar manner to the David Bottoms Quitclaim by the Defendants.

57. Even if the Howard Bottoms Deed were executed by Howard Bottoms, it is void and champertous, and REO accepted it with actual knowledge of its void and champertous character: REO knew, as Howard Bottoms knew, that Vernon Bottoms had devised the Bottoms Property to David Bottoms as trustee. REO and Mr. Walker generated the David Bottoms Quitclaim in an effort to create the impression that the Howard Bottoms Deed conveyed good and marketable title to the Bottoms Property.

5. The Martin/Gomez Property

58. On or about March 25, 1993, Manuel Martin and his wife, Lottie Martin, accepted a warranty deed to certain real property situated in Maury County and commonly known as 3134 Greens Mill Road. (This property is hereinafter known as the "Martin Property.")

59. Manuel Martin and Lottie Martin subsequently died. Manuel Martin died testate, leaving his estate to Lottie Martin and, if she predeceased him, to one Raymond Moss of Independence, Missouri. Mr. Martin's will expressly disinherits a daughter named Clarice Gomez. A true and accurate copy of Mr. Martin's will is attached hereto as **Exhibit 5.A** and incorporated herein by reference.

60. The Martin property was subsequently made the subject of a judicial property-tax collection effort by the State of Tennessee in the proceeding 13-169-DT referred to in Paragraph 24. The Martin Property was sold to G Co Investments, LLC, to satisfy unpaid taxes that had accrued against it pursuant to proceedings in that case.

61. On March 27, 2015, an affidavit of heirship purportedly executed that same day by an individual named Clarisa Gomez was presented to the Maury County Register of Deeds for recording. A true and accurate copy of this instrument (hereinafter referred to as the "Gomez Affidavit") is attached hereto as **Exhibit 5.B** and incorporated herein by reference. The Gomez Affidavit claims that Manuel Martin died intestate and that the affiant was his sole heir at law.

62. Also on March 27, 2015, a quitclaim deed purporting to convey the Martin Property from Clarisa Gomez, as Manuel Martin's heir at law, to REO was presented for recording to the Maury County Register of Deeds. (This instrument is hereinafter referred to as the "Gomez Quitclaim.") A true and accurate copy of the Gomez Quitclaim is attached hereto as **Exhibit 5.C** and incorporated herein by reference.

63. On the basis of the Gomez Affidavit and the Gomez Quitclaim, REO moved to redeem the Martin Property on March 27, 2015.

64. The Gomez Quitclaim and the Gomez Affidavit bear the notary stamps and signatures of Jon Paul Johnson. Mr. Johnson is, along with Mr. Walker, a general partner of C&J

Properties, a Tennessee general partnership. C&J Properties is, or at one time was, a manager, officer, director, member, or affiliate of REO.

65. The Gomez Quitclaim and Gomez Affidavits are forgeries. Clarissa Gomez, if such a person exist, is not Clarice Gomez, the daughter of Manuel Martin, and did not sign the Gomez Quitclaim or the Gomez Affidavit in any event. The Gomez Quitclaim was champertous, void, and ineffectual to convey any interest in the Martin Property to REO; it and the Gomez Affidavit were prepared by REO and Mr. Walker with knowledge of their false and champertous character in an attempt to practice a fraud upon, inter alia, the court in Maury County, the heirs of Manuel Martin, and the tax sale purchaser.

66. As a result of the inherent defects in the Gomez Affidavit and in light of Manuel Martin's will, REO's motion to redeem the Martin Property was subsequently denied.

6. The Burns/Booher Property

67. On or about February 14, 1968, Robert Burns and his wife, Betty Burns, accepted a trustee's deed to certain real property situated in Hamilton County, Tennessee, commonly known as 544 Las Lomas Drive, Chattanooga, and being more particularly described in a deed of record with the Hamilton County Register of Deeds at Record Book 1757, Page 650. (This deed is hereinafter referred to as "Burns Deed.") A true and accurate copy of the Burns Deed is attached hereto as **Exhibit 6.A** and incorporated herein by reference. (The property conveyed by the Burns Deed is hereinafter referred to as the "Burns Property.")

68. Betty Burns died on or about December 12, 2010. Robert Burns predeceased her.

69. Mr. and Mrs. Robert Burns had three children, John Burns, Elizabeth June Burns and Patricia McCaslin (née Burns). Mrs. Burns, by a prior husband, had two other sons, Allen Booher and Larry Booher. The children of Mr. and Mrs. Robert Burns are described in an

adversarial complaint filed in the United States Bankruptcy Court for the Eastern District of Tennessee, styled *Johnson v. Burns (In re McCaslin)*, No. 1:15-ap-1010, on March 12, 2015.

70. The Burns Property was eventually made the subject of an action brought on March 29, 2012, by Hamilton County for the enforcement of unpaid real property taxes, *Hamilton County v. 2010 Delinquent Taxpayers*, No. 11220. On or about June 5, 2014, the Burns Property was sold to Plaintiff Billy Gregory in satisfaction of unpaid property taxes that had accrued against it. A final decree confirming the sale was entered by the Tennessee Chancery Court for the Eleventh District on June 16, 2014.

71. On June 10, 2015, an affidavit of heirship was presented to the Hamilton County Register of Deeds for recording. The affidavit purports to have been executed by one Allen Booker, claims that the affiant resides at 102 Park Avenue, Piscataway, New Jersey, and that the affiant is the son of the Betty Burns who owned the Burns Property. A true and accurate copy of this affidavit of heirship (which is hereinafter called the "Booker Affidavit") is attached hereto as **Exhibit 6.B** and incorporated herein by reference.

72. The Booker Affidavit is false and fraudulent several times over.

73. First, the son of Betty Burns was not named Allen Booker, but was instead named Allen Booher: the Booker Affidavit is thus false as to its principal contention, that the affiant is the son of Betty Burns. Second, no one by either name, Allen Booker or Allen Booher, resides at 102 Park Avenue, Piscataway, New Jersey, 08854; indeed, no one resides at this address, which is a vacant lot. Third, even Allen Booker did not sign the Booker Affidavit: his signature was electronically or photostatically copied from a 1992 deed of record with the Middlesex County, New Jersey, County Clerk at Book 3974, Page 824. A true and accurate, but watermarked, copy of this deed (which is hereinafter referred to as the "1992 Deed") is attached hereto as **Exhibit**

6.C and incorporated herein by reference. Mr. Allen Booker now resides in Georgia and has not been to the State of New Jersey in over a decade. Fourth, the notary's acknowledgment appearing on the Booker Affidavit is a forgery: Mary J. Sims did not witness the acknowledgment of the Booker Affidavit on May 27, 2015, nor affix her signature and stamp thereto on that date or any other. Rather, the signature and stamp of Mary J. Sims were copied via photostatic or electronic means from some other instrument and similarly appended to the Booker Affidavit.

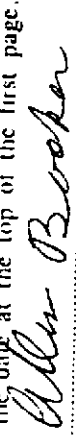
74. Also on June 10, 2015, a quitclaim deed purporting to convey the Burns Property from one Allen Booker to REO was presented to the Hamilton County Register of Deeds. A true and accurate copy of this deed (which is hereinafter referred to as the "Booker Quitclaim") is attached hereto as **Exhibit 6.D** and incorporated herein by reference. Like the Booker Affidavit, the Booker Quitclaim purports to have been executed on May 27, 2015, and notarized by Mary J. Sims. Also like the Booker Affidavit, the Booker Quitclaim is a forgery: it contains the same photostatically or electronically copied signature of Allen Booker and the similarly photostatically or electronically copied signature and stamp of Mary J. Sims.

75. A visual comparison of the signature of Allen Booker on the 1992 Deed with those appearing on the Booker Affidavit and the Booker Quitclaim reveals that the latter two are mere cut-and-paste reproductions of the former, albeit ones guilefully made:

The 1992 Deed:

Signatures. The Grantor signs this Deed as of the date at the top of the first page.

sd by:



ALLEN BOOKER.

The Booker Affidavit:

FURTHER AFFIANT SAYETH NAUGHT.


Allen Booker

The Booker Quitclaim:
first above written.

GRANTOR:

Allen Booker

76. The same comparison can be made with the supposed signatures of Mary Sims on the Booker Quitclaim and the Booker Affidavit:

The Booker Quitclaim:

and seal, this 27th day of May, 2015
A Notary Public of New Jersey 

The Booker Affidavit:

 A Notary Public of New Jersey

77. The task of making the lines on the signatures thinner or thicker can be learned and performed in Photoshop by anyone who devotes three minutes to researching the technique with an internet search engine.

78. Despite the falsity of the Booker Affidavit and the forged and champertous character of the Booker Quitclaim, REO relied upon them to claim an interest in the Burns Property and commenced a redemption of the Burns Property on that basis on June 12, 2015. A true and accurate copy of the documents REO filed with the Hamilton County Clerk and Master for this purpose is attached hereto as **Exhibit 6.E** and incorporated herein by reference.

7. The Woods Property

79. On or about September 8, 1965, upon information and belief, Cara Woods and his wife, Esma Woods, accepted a warranty deed conveying certain real property situated in Hamilton County commonly known as 5270 Rotary Drive, Chattanooga, and more completely described in the warranty deed, which is found in the records of the Hamilton County Register of

Deeds at Book 1642, Page 471. (This property is hereinafter referred to as the "Woods Property.")

80. Cara Woods subsequently died on or about August 25, 1971; his remains are interred in the Chattanooga National Cemetery in Section Qq. site 281.

81. Subsequently, the real property taxes that accrued against the Woods Property went unpaid. On March 29, 2012, Hamilton County commenced the tax-enforcement action referenced in Paragraph 70 and sought to collect the unpaid taxes that had accrued against, inter alia, the Woods Property.

82. On June 5, 2014, the Woods Property was sold in satisfaction of unpaid real property taxes pursuant to proceedings held in the aforementioned action. A final decree confirming that sale entered June 16, 2014.

83. On June 15, 2015, a quitclaim deed was presented to the Hamilton County Register of Deeds for recording. The quitclaim deed bears an execution date of June 2, 2015, and purports to convey the Woods Property from Cara Woods to REO. The quitclaim deed bears the purported signature of Cara Woods and an attestation and stamp purporting to be that of Danita Toone, a notary public for Macomb County, Michigan. A true and accurate copy of this quitclaim deed is attached hereto as **Exhibit 7.A** and incorporated herein by reference. (This instrument is hereinafter referred to as the "Woods Quitclaim.")

84. On the basis of the Woods Quitclaim, REO commenced a redemption of the Woods Property as its owner on June 15, 2015. True and accurate copies of the documents submitted by REO to commence that redemption are attached hereto as **Exhibit 7.B** and incorporated herein by reference.

85. The Woods Quitclaim, of course, is a forgery: Cara Woods died forty years before it was supposedly signed. Danita Toone never witnessed an acknowledgment of the Woods Quitclaim or affixed her signature or stamp thereto. As such, REO owns no interest whatsoever in the Woods Property.

8. The Hixson Property

86. On or about January 21, 1946, William Davis and his wife, Glenna Davis accepted a deed conveying to them as tenants by the entireties certain real property situated in Hamilton County and commonly known as 16 North Parkdale Avenue, Chattanooga. (This property is hereinafter referred to as the "Hixson Property.") A true and accurate copy of the January 21, 1946, deed is attached hereto as **Exhibit 8.A** and incorporated herein by reference.

87. William Davis died sometime prior to April 18, 2004. Glenna Davis died on or about April 18, 2004. Upon information and belief, Glenna Davis died intestate and seized of the Hixson Property.

88. The real property taxes that accrued against the Hixson Property went unpaid at some point during or prior to 2010 and remained unpaid thereafter during 2011 and 2012. As a result, Hamilton County made the owner or owners of the Hixson Property defendants in Case No. 11220 described in Paragraph 70 for the purpose of collecting the unpaid taxes that had accrued against that property.

89. Pursuant to proceedings in case no. 11220, the Hixson Property was sold on June 5, 2014, in satisfaction of the accrued and unpaid taxes. A decree confirming the sale entered on June 16, 2014.

90. On June 2, 2015, Mr. Walker presented an affidavit of heirship to the Hamilton County Register of Deeds for recording. The affidavit purports to have been executed by James Hixson and claims that the affiant resides at 795 Lay Avenue, Red Bluff, California. The affidavit

claims that Mr. Hixson is the sole heir at law of Glenna Davis and, accordingly, sole owner of the Hixson Property. A true and accurate copy of this affidavit (hereinafter referred to as the "Hixson Affidavit") is attached hereto as **Exhibit 8.B** and incorporated herein by reference.

91. The Hixson Affidavit purports to have been sworn to, executed, and acknowledged before Jesse Berber, a notary public for Orange County, California, on May 28, 2015, and bears his purported signature and stamp.

92. Also on June 2, 2015, Mr. Walker presented a quitclaim deed to the Hamilton County Register of Deeds for recording. The quitclaim deed purports to have been executed on May 28, 2015, by James Hixson and purports to convey the Hixson Property to REO. A true and accurate copy of this quitclaim deed (which is hereinafter referred to as the "Hixson Quitclaim") is attached hereto as **Exhibit 8.C** and incorporated herein by reference.

93. Like the Hixson Affidavit, the Hixson Quitclaims bears the purported signature and stamp of Jesse Berber, a California notary public.

94. Invoking the Hixson Affidavit and the Hixson Quitclaim, REO commenced a redemption of the Hixson Property on June 5, 2015.

95. The Hixson Affidavit and the Hixson Quitclaim, however, are forgeries created by Mr. Walker in cooperation with the other Defendants. Jesse Berber notarized neither of these documents. Indeed, the notarizations found on the Hixson Quitclaim and Hixson Affidavit do not comply with the requirements of California law in effect on May 28, 2015, as each omits the notice required by 2014 California Legislative Service Chapter 197, *codified at* Cal. Civ. Code § 1195, Cal. Gov. Code § 8202. The signature and stamp of Jesse Berber and, upon information and belief, the signature of James Hixson, appearing on each of these documents is a copy made by electronic or photostatic means from some other document and appended by similar means to

the Hixson Affidavit and the Hixson Quitclaim. As such, the Hixson Affidavit and Hixson Quitclaim are void, and REO has obtained no title to the Hixson Property.

D. CLASS ACTION ALLEGATIONS

96. Plaintiffs bring this action on behalf of themselves and all persons similarly situated, pursuant to Tennessee Rule of Civil Procedure 23.02(2) and 23.02(3).

97. The Plaintiffs seek to represent Classes consisting of:

- a. all persons who owned an interest in real property fraudulently redeemed from a tax sale by the Defendants, and
- b. all persons who purchased at tax sale real property subsequently fraudulently redeemed, or attempted to be redeemed, by the Defendants.

Excluded from the Classes are the Defendants, their officers, members, shareholders, directors, managers, and employees, the Chancellor assigned to this case, and the attorneys of record in this case. Plaintiffs reserve the right to amend the Class definitions if discovery and further investigation reveal that any of the Classes should be expanded or otherwise modified.

98. The Defendants have engaged in the criminal enterprise at issue in this Complaint far beyond the instances recounted herein. Moreover, many of the properties to which the Defendants have obtained pretended titles through this enterprise are truly owned by assorted tenants in common. Accordingly, the members of the Classes are so numerous that joinder of all members would be impracticable.

99. There are common questions of law and fact that predominate over any questions affecting only individual members of each Class. These common questions of law and fact include, but are not limited to, the following:

- a. Whether the Defendants are engaged in a criminal enterprise directed at obtaining tax-sale properties via fraud;
- b. Whether the Defendants are liable for violation of the Racketeering Influenced and Corrupt Organizations Act, 18 U.S.C. §§ 1961-68;
- c. Whether the Defendants have violated the Tennessee Consumer Protection Act;
- d. Whether the Defendants have violated the statutes governing acknowledgments, oaths, and notaries public;
- e. Whether the Defendants have engaged in a tortious civil conspiracy; and
- f. Whether the Defendants obtained title to property, or otherwise damaged the member of the Class, by affixing a forged signature or notary stamp to an instrument.

100. The representative Plaintiffs' claims are typical of the claims of the members of the Classes. Plaintiffs and all Class members have been injured by the same criminal enterprise operated by the Defendants. Plaintiffs' claims arise from the same practices and course of conduct as give rise to the claims of the Class members and are based on the same legal theories.

101. Plaintiffs are representatives who will fully and adequately assert and protect the interests of the Classes and have retained experienced and qualified class counsel. Neither Plaintiffs nor their attorneys have any interests contrary to or in conflict with those of the Classes.

102. A class action is superior to all other available methods for the fair and efficient adjudication of this lawsuit, because individual litigation of the claims of all Class members is unfeasible and procedurally impracticable. The Defendants' enterprise entails ongoing unlawful conduct affecting unwitting victims across the State. Individual members of the Classes do not

have a significant interest in individually controlling the prosecution of separate actions. The likelihood of individual Class members prosecuting their own respective claims is remote; even if every Class member could afford individual litigation, the court system would be unduly burdened by individual litigation of these cases. This is especially true given the need for broad-ranging injunctive relief: the Defendants have acted on grounds generally applicable to the Classes and, as such, not only is injunctive or declaratory relief appropriate as to the Classes as a whole, but individual cases would result in varying, inconsistent, or contradictory judgments and orders and would magnify the delay and expense to all parties and the judiciary.

103. Plaintiffs know of no difficult to be encountered in the management of this action that would preclude its maintenance as a class action.

104. Defendants have, or have access to, information regarding the Class members that may be used for the purpose of providing notice of the pendency of this action. Such information, to the extent not in the possession of or accessible to the Defendants, may be ascertained from publicly available sources.

E. THE PLAINTIFFS' INTERESTS

105. The Plaintiff FTS is the owner of the claims arising from the Moore Property as the assignee of Jack Moore.

106. The Plaintiff Billy Gregory is the owner of claims arising from the Burns Property as a result of his purchase of that property at the tax sale at which it was sold.

F. PREDICATE ACTS

1. Wire Fraud: Remote Recording

107. The Defendants engaged in the acts described and alleged in this Complaint in the course of a scheme or artifice to defraud and to obtain money and property by means of false or

fraudulent pretenses. In particular, but without limitation, the Defendants have operated an enterprise aimed at securing titles to real property by means of false and forged documents, of selling real property to unsuspecting third parties on the basis of titles so secured, and of borrowing money against real property on the basis of titles so secured.

108. The recordation of muniments of title with the various registers of deeds throughout Tennessee has been an essential element of the Defendants' scheme and enterprise.

109. In furtherance and pursuit of the aforementioned scheme, artifice, and enterprise, Mr. Walker has, with the knowledge and cooperation and at the behest of the other Defendants, transmitted documents and communications to various Registers of Deeds via the online service Simplifile.

110. Documents transmitted to a register's office via Simplifile, including those transmitted by the Defendant, are uploaded from the filing user's computer to Simplifile's servers and then transmitted from those servers to the destination register's office. Simplifile maintains three servers, none of which is located in the State of Tennessee. Two are located in the State of Utah, and Simplifile's system uses built-in redundancy routines that, upon information and belief, entail any uploaded document being stored on more than one of these servers. Accordingly, all transmissions made via Simplifile that originate in Tennessee travel across state lines, and this would be the case even if the third Simplifile server were located in this State (which it is not).

111. Mr. Walker has filed numerous documents via Simplifile in furtherance of the aforementioned scheme, artifice, and enterprise, including but not limited to the Augustine Quitclaim, the Woods Quitclaim, the Hixson Quitclaim, the Booker Quitclaim, and the Booker Affidavit.

112. Each of the foregoing transmissions constitutes fraud by wire in violation of 18 U.S.C. § 1343.

2. Wire Fraud: Retrieval of Foreign Documents

113. In order to execute their scheme or artifice to defraud and to obtain money and property by means of false or fraudulent pretenses, the Defendants affixed false signatures and notary stamps to instruments they then submitted to courts and to registers of deeds. Many of the false signatures and notary stamps were photostatically or electronically copied from instruments maintained of record in other states.

114. In order to obtain images of the stamps and signatures to be copied, the Defendants caused electronic copies of the documents to which they were originally appended to be transmitted by means of a wire, over the internet, from the office of an out-of-state officer charged with recording real-estate instruments (or the third-party servicer of such officer's online records service) to Tennessee.

115. Each such act of obtaining an out-of-state instrument was carried out for the purpose of executing the scheme or artifice and enterprise described in this complaint.

116. In particular, but without limitation, the Defendants caused the 1992 Deed to be transmitted over a wire from the State of New Jersey to a location in Tennessee, specifically, upon information and belief, the Walker Law Offices at 69 Thompson Lane, Nashville, for the purpose of carrying out the scheme or artifice and enterprise herein described. The signature from the 1992 Deed was then copied and falsely affixed to the Booker Quitclaim and Booker Affidavit.

117. The Defendants similarly caused the unidentified instruments from which the other false notary signatures and stamps were copied to be similarly transmitted over a wire in interstate commerce. These instruments include that (obtained from New Jersey) from which the

notarization imagery on the Booker Affidavit and Booker Quitclaim was copied, that (obtained from California) from which the notarization imagery on the Augustine Quitclaim was copied, that (obtained from Texas) from which the notarization imagery on the October 22 Quitclaim was copied, that (obtained from Michigan) from which the notarization imagery on the Woods Quitclaim was copied; and that (obtained from California) from which the notarization imagery on the Hixson Quitclaim and Hixson Affidavit was copied.

118. Each of the foregoing transmissions was effected in furtherance of the aforementioned scheme, artifice, and enterprise.

119. Each of the foregoing transmissions constitutes fraud by wire in violation of 18 U.S.C. § 1343.

3. Mail Fraud

120. The Moore Quitclaim (Exhibit 1.D) was recorded by the Maury County, Tennessee, Register of Deeds on March 30, 2015. Mr. Walker, in cooperation with and at the behest of REO, either in person or via an agent, submitted the Moore Quitclaim to the Maury County Register of Deeds in furtherance of and for the purpose of executing the artifice, scheme, or enterprise described in this complaint.

121. The Moore Affidavit (Exhibit 1.E), likewise, was recorded by the Maury County, Tennessee, Register of Deeds on April 6, 2015. Mr. Walker, in cooperation with and at the behest of REO, either in person or via an agent, submitted the Moore Quitclaim to the Maury County Register of Deeds in furtherance of and for the purpose of executing the artifice, scheme, or enterprise described in this complaint.

122. The Gomez Affidavit (Exhibit 5.B) and Gomez Quitclaim (Exhibit 5.C) were presented by Mr. Walker, either in person or via an agent, to the Maury County Register of Deeds for recording on or about March 27, 2015. Mr. Walker made that presentation in

cooperation with and at the behest of REO in furtherance of and for the purpose of executing the artifice, scheme, or enterprise described in this complaint.

123. When he delivered the Moore Quitclaim, the Moore Affidavit, the Gomez Quitclaim, and the Gomez Affidavit to the Maury County Register of Deeds, Mr. Walker requested, either personally or via an agent, that the Register mail the originals to him after they had been recorded.

124. Based on Mr. Walker's request, the Maury County Register of Deeds did, in fact, on or about March 30, 2015, place the original Moore Quitclaim in a United States post office or authorized depository for mail matter, addressed for delivery via the United States Postal Service to "Walker Law Office, 69 Thompson Lane, Nashville, TN 37211." The United States Postal Service did, upon information and belief, convey the Moore Quitclaim to Mr. Walker at that address, and Mr. Walker received the Moore Quitclaim from the Postal Service.

125. In a similar manner, based on Mr. Walker's request, the Maury County Register of Deeds did, in fact, on or about April 6, 2015, place the original Moore Affidavit in a United States post office or authorized depository for mail matter, addressed for delivery via the United States Postal Service to "Walker Law Office, 69 Thompson Lane, Nashville, TN 37211." The United States Postal Service did, upon information and belief, convey the Moore Affidavit to Mr. Walker at that address, and Mr. Walker received the Moore Affidavit from the Postal Service.

126. In a similar manner, based on Mr. Walker's request, the Maury County Register of Deeds did, in fact, on or about March 27, 2015, place the original Gomez Affidavit in a United States post office or authorized depository for mail matter, addressed for delivery via the United States Postal Service to "Walker Law Office, 69 Thompson Lane, Nashville, TN 37211." The United States Postal Service did, upon information and belief, convey the Gomez Affidavit to

Mr. Walker at that address, and Mr. Walker received the Gomez Affidavit from the Postal Service.

127. In a similar manner, based on Mr. Walker's request, the Maury County Register of Deeds did, in fact, on or about March 27, 2015, place the original Gomez Quitclaim in a United States post office or authorized depository for mail matter, addressed for delivery via the United States Postal Service to "Walker Law Office, 69 Thompson Lane, Nashville, TN 37211." The United States Postal Service did, upon information and belief, convey the Gomez Quitclaim to Mr. Walker at that address, and Mr. Walker received the Gomez Quitclaim from the Postal Service.

128. The return of original recorded instruments is a standard part of the practice of each register of deeds in this State. The Defendants sought to obtain and retain the original copies of documents recorded by them, including the Moore Quitclaim, Moore Affidavit, Gomez Affidavit, and Gomez Quitclaim, in order to create the impression of normalcy in their fraudulent transactions and so that they would have the best evidence of their (false) muniments of title. For these and other reasons, the transmission of the Moore Quitclaim, Moore Affidavit, Gomez Quitclaim, and Gomez Affidavit from the Maury County Register of Deeds to Mr. Walker through the mail, and Mr. Walker's receipt of those instruments from the mail, were carried out for the purpose of executing the scheme, artifice, or enterprise described in this complaint.

129. Mr. Walker's acts of receiving each of the aforementioned instruments constituted mail fraud in violation of 18 U.S.C. § 1341.

G. LEGAL CLAIMS

COUNT I: VIOLATION OF THE RACKETEERING INFLUENCED AND CORRUPT ORGANIZATIONS ACT

130. The averments set forth in Paragraphs 1 through 129 are incorporated herein by reference.

131. Defendants' actions violated RICO.

132. Defendants, together, are part of an "association in fact" enterprise. Defendants have formed an ongoing organization and function as a unit. The purpose of the enterprise is to obtain title to real property and to obtain money in exchange for real property on the basis of forged and pretended deeds and other instruments of title. The enterprise is separate from the pattern of racketeering activity in which defendants are engaged.

133. Defendants' enterprise has affected, and continues to affect, interstate commerce.

134. Defendants REO, Walker, Johnson, Coone and Ibrahim, individually, are associated with the enterprise, which has engaged in the criminal activity detailed supra. Each defendant participated directly in the conduct and affairs of the association-in-fact enterprise.

135. Defendants participated in the association in fact enterprise through a pattern of racketeering activity by committing multiple acts of wire and mail fraud.

136. As a direct and proximate result of Defendants' conduct in violation of RICO, plaintiffs, and members of the putative classes, have been damaged.

COUNT II: VIOLATION OF THE TENNESSEE CONSUMER PROTECTION ACT

137. The averments contained in Paragraphs 1 through 136 are incorporated herein by reference.

138. The Defendants have, in connection with the acts set forth in this Complaint, engaged in numerous violations of the provisions of Tennessee Code Title 8, Chapter 16. In

particular, but without limitation, (A) Defendant Jon Paul Johnson violated the provisions of Section 8-16-112 in notarizing the Gomez Affidavit, the Gomez Quitclaim, the Booker Affidavit's true copy certification, the Booker Quitclaim's true copy certification, the Hixson Affidavit's true copy certification, the Hixson Quitclaim's true copy certification, the Woods Quitclaim's true copy certification; (B) Defendant Charles Walker violated the provisions of Section 8-16-112 in notarizing the October 10 Quitclaim; and (C) Defendant Julie Coone violated Section 8-16-112 in notarizing the Moore Quitclaim. Each of those documents was materially false and was not, as the attestations thereon claimed, "executed and authenticated according to law."

139. The Defendants' violations of Section 8-16-112 constitute unfair and deceptive acts pursuant to Tennessee Code Sections 8-16-403 and 47-18-104. As a result of the Defendants' unfair and deceptive acts, the Plaintiffs, and the other members of the class, have suffered ascertainable losses of money or property.

COUNT III: SLANDER OF TITLE

140. The averments set forth in Paragraphs 1 through 139 are incorporated herein by reference.

141. Defendants have published false statements concerning plaintiff Gregory's title to the Burns Property and plaintiff FTS's title to the Moore Property. Defendants have likewise published false statements concerning the title absent class members hold in other real property in Tennessee, including but not limited to the property described above.

142. Defendants published all such false statements maliciously in order to interfere with plaintiffs' title to such property and with that of absent members of the plaintiff class.

143. Defendants knew their statements were false when made and knew that such statements would likely harm the plaintiffs.

144. Defendants' publication of such maliciously false statements has, in fact, interfered with plaintiffs' title and that of absent members of the plaintiff class, and has proximately caused damage to the named plaintiffs and to other members of the plaintiff class.

COUNT IV: FRAUD

145. The averments set forth in Paragraphs 1 through 144 are incorporated herein by reference.

146. Defendants falsely represented a claim to, and the status of Plaintiff Gregory's title to, the Burns Property. Defendants further misrepresented a claim to, and the status of Plaintiff FTS's title to, the Moore property. Defendants have likewise misrepresented the title and claim of themselves and of absent class members to other real property located in the State of Tennessee, including the property listed above.

147. Defendants' misrepresentations were intentional and material.

148. Defendants' misrepresentations constitute a scheme or artifice to defraud. Plaintiffs, and others, reasonably relied upon Defendants' misrepresentations to their detriment.

149. As a direct and proximate result of such reliance, plaintiffs and absent members of the plaintiff class had been damaged.

COUNT V: RELIEF FROM JUDGMENT

150. The averments set forth in Paragraphs 1 through 149 are incorporated herein by reference.

151. The Defendants have, through the fraudulent and criminal means described herein, obtained numerous judgments finalizing redemptions and quieting title in their respective names.

152. Each such judgment obtained by fraud is void.

153. As such, the Court may, and should, enter a declaration setting aside every such judgment entered by the Tennessee Chancery Court or the Tennessee Circuit Court, in whatever judicial district it may have been sitting at the time, vesting title in one of the Defendants, or in any grantee of a Defendant other than a good-faith purchaser for value, that resulted from fraud and forgery executed in the manner described in this complaint.

COUNT VI: VIOLATION OF TENNESSEE CODE § 30-2-712

154. The averments set forth in Paragraphs 1 through 153 are incorporated herein by reference.

155. The Defendants' criminal enterprise has, as described herein, entailed the recording with the Davidson County Register of Deeds and use of numerous false affidavits of heirship pursuant to Tennessee Code Section 30-2-712.

156. The Defendants have employed and recorded such false affidavits in other counties as well.

157. The Plaintiffs and absent members of the Plaintiff Classes have suffered injuries as a result of the Defendants' acts.

158. The false affidavits heretofore described, and those that will by means of discovery and proof be shown hereafter to be false should be expunged from the records of the Register of Deeds for Davidson County and those of this Court pursuant to Tennessee Code Section 30-2-712(e)(1).

COUNT VII: LIABILITY PURSUANT TO TENNESSEE CODE § 66-22-113.

159. The averments set forth in Paragraphs 1 through 158 are incorporated herein by reference.

160. The Defendants Charles Walker, Julie Coone, and Jon Paul Johnson have each executed forged or fraudulent documents and witnessed false oaths and certifications as described in this Complaint.

161. In so doing, those Defendants have either intentionally or through the failure to exercise reasonable care failed to discharge the duties and obligations of a notary public imposed by Tennessee Code Title 66, Chapter 22.

162. As a result of the Defendants' conduct, the Plaintiffs and the absent members of the Plaintiff Classes have suffered injuries.

163. Accordingly, these Defendants are liable to the Plaintiffs and the absent members of the Plaintiff Classes pursuant to Tennessee Code Section 66-22-113.

COUNT VIII: TRESPASS AND EJECTMENT

164. The averments set forth in Paragraphs 1 through 163 are incorporated herein by reference.

165. As a result of the Defendants' enterprisc, scheme, and artifice, they have obtained and presently retain possession of real property properly belonging to the Plaintiffs and to absent members of the Plaintiff Classes.

166. As a consequence, the Plaintiffs and the absent members of the Plaintiff Classes have suffered damages and are entitled to reclaim possession of their respective lands.

COUNT IX: CIVIL CONSPIRACY

167. The averments set forth in Paragraphs 1 through 166 are incorporated herein by reference.

168. Defendants entered into an agreement to commit an unlawful act, namely, to obtain real property and money through the sale or mortgage of real property on the basis of forged and pretended deeds.

169. Pursuant to such agreement, Defendants committed the numerous tortious and wrongful acts detailed above. Specifically, Defendants used forged deeds and other instruments to obtain title to the Burns Property, to the Moore Property, and to the other property described above.

170. As a direct and proximate result of the commission of Defendants' tortious and wrongful acts, named plaintiffs and absent members of the plaintiff class have been damaged.

WHEREFORE, premises considered, the Plaintiffs pray as follows:

- A. That the Court certify the Classes described herein pursuant to Tennessee Rule of Civil Procedure 23.02 and 23.03, appoint the Plaintiffs representatives of the Classes, and appoint the Plaintiffs' counsel as counsel for the Classes;
- B. That the Court preliminarily and permanently enjoin the Defendants from conveying or encumbering any real property located in Tennessee;
- C. That the Court set aside each judgment or decree obtained by the Defendants through the fraudulent enterprise described herein;
- D. That the Court, pursuant to Tennessee Code § 30-2-712, expunge the false affidavits of heirship recorded by the Defendants;
- E. That the Court preliminarily and permanently enjoin the Defendants' fraudulent and criminal conduct pursuant to Tennessee Rules of Civil Procedure 65 and 23.02(2), 18 U.S.C. § 1964, and Tennessee Code § 47-18-109(b);
- F. That the Court declare the Defendants' abuse of the notarization system an unfair and deceptive practice pursuant to Tennessee Code § 47-18-109(b);

- G. That the Court pierce the corporate veil of REO Holdings, LLC, and hold its members individually liable on the basis of their use of the entity as a means to perpetrate fraud and operate a criminal enterprise;
- H. That the Court enter a judgment of compensatory damages against the Defendants and in favor of the Plaintiffs and the absent members of the Plaintiff Classes pursuant to Tennessee Rule of Civil Procedure 23.02 in an amount in excess of \$500,000;
- I. That the Court enter a judgment of punitive damages against the Defendants and in favor of the Plaintiffs and the absent members of the Plaintiff Classes pursuant to Tennessee Rule of Civil Procedure 23.02 in an amount in excess of \$2,000,000;
- J. That the Court enter a judgment of treble damages against the Defendants and in favor of the Plaintiffs and the absent members of the Plaintiff Classes pursuant to Tennessee Code 47-18-109(a)(3) and Tennessee Rule of Civil Procedure 23.02;
- K. That the Court award the Plaintiffs their reasonable attorney's fees pursuant to, inter alia, Tennessee Code Sections 47-18-109(c)(1) and 66-22-113 and 18 U.S.C. § 1964;
- L. That the Court award the Plaintiffs their attorney's fees and expenses, prejudgment interest, and the costs of this action; and
- M. That the Court award the Plaintiffs all such other relief as may be just, equitable, and proper.

Respectfully submitted:
LEADER, BULSO & NOLAN, PLC

By: LN Bul

Eugene N. Bulso, Jr. (No. 12005)
Paul J. Krog (No. 29263)
414 Union Street, Suite 1740
Nashville, Tennessee 37219
(615) 780-4115

*Attorneys for Plaintiffs, Family Trust Services,
LLC, and Billy Gregory*

[illegible]

CONFIDENTIAL IN ORIGIN
I hereby certify that this is a copy of the
document and that the title of document of the
document is as shown herein.
W. J. [Signature]
Baltimore, Md., Aug. 1915

This instrument prepared by Bobby W. Sands, Attorney at Law, P. O. Box 90, Columbia, Tennessee, 38402-0090

MA:1
Jack Moore
102 E. 17th St.
Columbia, TN 38401

QUIT-CLAIM DEED

For and in consideration of the sum of One Dollar (\$1.00), cash in hand paid, I, KAREN

MOORE, do hereby sell, transfer, quitclaim and convey unto JACK K. MOORE, his heirs and assigns, the following described real property located in Maury County, Tennessee, bounded and described as follows:

TRACT # I Located in the Ninth (9th) Civil District of Maury County, Tennessee and being designated as Lot 17 on the Stockyard plat of record in Book N, Volume 3, Page 478, Register's Office of Maury County, Tennessee, and more particularly described as follows

Beginning at an iron pin set on the South side of the sidewalk of West 12th Street at a common corner to the Stockyards Subdivision, Lot 16, thence leaving the street and with the East boundary of Lot 15, South 06 deg. 30 min. West 241.00 feet to an iron pin, South 83 deg. 42 min. East 73.00 feet to an iron pin, thence, North 06 deg. 30 min. East 240.75 feet to an iron pin set on the South side of the sidewalk of West 12th Street, thence North 83 deg. 30 min. West 73.00 feet with the South margin of West 12th Street to the point of beginning containing 0.40 acres, the same to be more or less, according to survey of Ace Hensley, dated August 5, 1988.

Tax ID: 09-1001-B-100F-3.00

Being the same property conveyed to Jack Moore by deed of record in Book 1302, Page 704, Register's Office, Maury County, Tennessee

TRACT # II Located in the Ninth (9th) Civil District of Maury County, Tennessee and being more particularly described as follows

A house and lot fronting on the west margin of High Street for a distance of 49.96 feet and extending back westwardly between parallel lines 198 feet, being bounded on the North by Cranford (formerly Aydelett), South by Brook (formerly White) on the East by High Street and on the West by Peck (formerly Fry)

Tax ID: 09-100F-C-100I-25.00

Being the same property conveyed to Jack K. Moore and wife, Karen Moore, by deed of record in Book 1302, Page 900, Register's Office, Maury County, Tennessee

TRACT # III Located in the Eight (8th) Civil District of Maury County, Tennessee

Tract I: Being Tract 1 of Harlan Acres, according to plat of record in Plat Book 4, Page 129, Register's Office of Maury County, Tennessee. Said tract contains 1.72 acres according to survey of John J. Harris

Tract 2: Being lot No. 1, Armour Acres Subdivision, Section 1, as shown on plat of record in Plat Book 4, Page 133, Register's Office of Maury County, Tennessee, said subdivision being a Revision of Tracts 4-9 of the Ramsey Electric Company Subdivision as shown on plat of record in Plat Book 4, Page 129, Register's Office of Maury County, Tennessee (also known as the Harlan Acres property). Said lot fronts 105 feet on the southern side of Steve Drive and extends back S. 36 deg. 45 min. E. between parallel lines 450 ft. in length to a common line in the rear having a length of 105 ft. and containing 1.085 acres according to said plat. This lot being a portion of Tract 4 of the Ramsey Electric Company Subdivision referred to above

TRACT 3 Being Tracts Nos. 2 and 3 of Harlan Acres, according to plat of record in Plat Book 4, Page 129, Register's Office of Maury County, Tennessee

BK R1489 PG 279

FILED
JUN 30 AM 11:17
REGISTER
CLERKERY CT
DC&M

Tax ID: 08-078-078-54.00

Being the same property conveyed to Jack Moore and wife, Karen Moore, by deed of record in Book 1350, Page 93, Register's Office, Maury County, Tennessee

These descriptions are taken from prior deeds

This deed has been prepared solely upon information furnished by the Grantor and Grantee. There has been no examination of the title by the preparer who assumes no responsibility for the accuracy of the information shown herein.

TO HAVE AND TO HOLD said tract or parcel unto the Grantee, his heirs and assigns, together with all of the rights, titles, interests, easements and appurtenances thereunto belonging

IN WITNESS WHEREOF, I have hereunto set my hand, this 12th day of

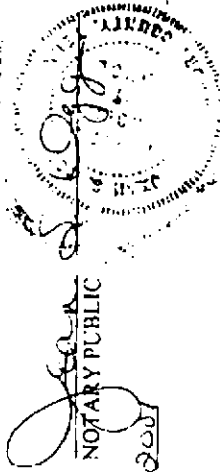
May, 2000

Karen Moore
KAREN MOORE

STATE OF TENNESSEE
COUNTY OF MAURY

Personally appeared before me, the undersigned authority, a Notary Public in and for the above County and State, the within named KAREN MOORE, the bargainor, with whom I am personally acquainted (or proved to me on the basis of satisfactory evidence), and who acknowledged that she executed the foregoing instrument for the purposes therein contained and expressed

Witness my hand and seal at office in Columbia, Tennessee, this 12th day of May, 2000



MY COMMISSION EXPIRES 12-31-2001

STATE OF TENNESSEE
COUNTY OF MAURY

This conveyance is made pursuant to settlement of marital rights in a divorce action and therefore exempt from taxation pursuant to T.C.A. §67-4-409(a)(3)(E).

Karen Moore
AFFIANT

Subscribed and sworn to before me, this 12th day of May, 2000

Karen Moore
NOTARY PUBLIC

My Commission Expires 12-31-2001

Real Property Taxes Will Be Paid By

Jack K. Moore
2413 Steve Drive
Columbia, TN 37618
BK R1489 PG 280

State of Tennessee, County of Maury
Received for record the 15 day of
JUNE 2000 at 11:42 AM. (REC# 40582)
Recorded in official records
Book R1489 Pages 279-280
State Tax \$.00 Clerks Fee \$.00
Recording Fee \$ 10.00 Total \$ 10.00

IN THE CHANCERY COURT FOR MAURY COUNTY, TENNESSEE

AT COLUMBIA

STATE OF TENNESSEE, F/B/O)

CITY OF COLUMBIA,)

CITY OF MT. PLEASANT,)

CITY OF SPRING HILL,)

Z MAURY COUNTY,)

PLAINTIFFS)

VERSUS)

20 // DELINQUENT TAXPAYERS,)

DEFENDANTS.)

MOTION AND NOTICE TO REDEEM PROPERTY
PURSUANT TO T.C.A. §67-5-2701 ET SEQ.

Comes now your Movant, REO Holdings, LLC, and files
this Motion to Redeem the property described as follows:

Map and Parcel No 8-78-5400, more commonly known as:

(Address of Parcel): Steve Dr., Columbia, TN

The property was sold at the delinquent real property tax sale held on:

March 20, 2014

The Final Decree Confirming the Sale was entered on:

March 28, 2014

I have the right to redeem the property because:

REO Holdings, LLC, obtained the right of
redemption by deed dated 5-28-15 Book R 2313
Page 919-920 Maury County Register of Deeds

Amount paid by the redeeming party: \$11620

Date of Recording of Interest in the Register of Deeds Office of Party claiming an interest in
excess sale proceeds: 8-28-15 (this should be 30 days prior to the
day the Motion is scheduled to be heard, see T.C.A. §67-5-2702(d).

FILED

2015 JUN 30 AM 11:17

CLERK AND MASTER
OF THE CHANCERY COURT

DC&M

NO. 13-169

2015 MAR 30 PM 2:44

CLERK
OF THE CHANCERY COURT
MAURY COUNTY, TN

SCANNED

MAR 30 2015

Print Name of Redeeming Party REO Holdings, LLC
Mailing Address 69 Thompson Lane Nashville, TN 37211
Telephone Number 615-367-5111
Signature of Redeeming Party [Signature]

NOTICE OF HEARING

PLEASE TAKE NOTICE THAT THIS MOTION WILL BE HEARD ON THE

27 DAY OF April, 2015 AT 9:00 A.M. OR AS SOON AS

COUNSEL MAY BE HEARD BY THE COURT. *** hearing date must be at least

30 days from the date of the mailing of this Motion.

[Signature]
CLERK AND MASTER

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing MOTION AND NOTICE OF HEARING has been served on the following:

REO HOLDINGS LLC, 121 POPLAR ST OWENSBORO KY 42301

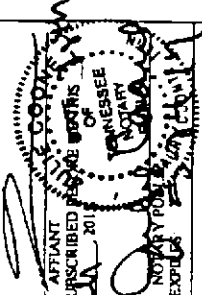
PORT ROYAL LLC P O BOX 148743 NASHVILLE TN 37214

JACK MOORE, 517 SHILOAH CIR COLUMBIA TN 38401

DANIEL MURPHY, P O BOX 90 COLUMBIA TN 38402

by placing the same in the U.S. Mail, postage pre-paid, this 30 day of
March, 2015.

[Signature]
CLERK AND MASTER

QUITCLAIM DEED BE/PG: R2313/919-920 15003389 		OATH OF CONSIDERATION: SS STATE OF TENNESSEE COUNTY OF DAVIDSON THE ACTUAL CONSIDERATION OR FAIR MARKET VALUE, WHICHEVER IS GREATER FOR THIS TRANSFER IS \$ <u>15,000.00</u>	
3 Fee 1 M - QUITCLAIM DEED 01/26/2015 2:01:03 PM 15000.00 0.00 15000.00 15.00 15.00 3.00 1.00 TOTAL AMOUNT \$0.00 STATE OF TENNESSEE - MAURY COUNTY JOHN FLEMING REGISTER OF DEEDS		AFFIANT SWORN TO AND SUBSCRIBED BEFORE ME THIS <u>15</u> DAY OF <u>MARCH</u> , 2015  MY COMMISSION EXPIRES <u>03-15-2017</u>	
THIS INSTRUMENT PREPARED BY: WALKER LAW OFFICES 69 THOMPSON LANE NASHVILLE, TENNESSEE 37211 OFFICE: (615) 461-3760			
ADDRESS OF NEW OWNER(S): REO Holdings, LLC 121 Poplar St Owensboro, Kentucky 42301		SEND TAX BILLS TO: Same	MAP-PARCEL NUMBER(S): 8-78-54.00

QUITCLAIM DEED

THIS INSTRUMENT, made and entered into this 15 day of March, 2015, by and between Jack Moore, ("Grantor") and REO Holdings, LLC, a Tennessee Limited Liability Company ("Grantee");

WITNESSETH:

FOR AND IN CONSIDERATION of the sum of ten dollars (\$10) and other good and valuable consideration, the receipt and legal sufficiency of which are hereby acknowledged, Grantor does hereby convey, transfer, remise, release, relinquish and quitclaim unto Grantee, Grantee's heirs and assigns, all of Grantor's right, title and interest, specifically including his statutory right of redemption arising from the tax sale confirmed by Decree of the Maury County Chancery Court¹, in and to the following described real estate in Maury County, State of Tennessee, to-wit:

SITUATE in the Eighth (8th) civil district of Maury County, Tennessee, and more particularly described as:

Tract 1: Being Tract 1 of Harlan Acres, according to plat of record in Plat Book 4, Page 129, Register's Office of Maury County, Tennessee. Said Tract contains 1.72 acres according to survey of John J. Harris.

Tract 2: Being Tracts Nos. 2 and 3 of Harlan Acres, according to plat of record in Plat Book 4, Page 129, Register's Office of Maury County, Tennessee.

Less and Except: A tract of land located in the Eighth Civil District of Maury County, Tennessee more particularly described as follows:

Beginning at an iron pin set in the southeast right-of-way of Steve Dr; said pin being located North 53 deg. 15 min. East 135 feet from the northwest corner of James R. Walter Deed Book 643, Page 682 and the southwest corner of Jack K. Moore; thence with the southeast right-of-way of Steve Drive North 53 deg. 15 min. East 140.00 feet to an existing iron pin set at a point of curvature; thence with a curve to the left having a radius of 274.54 feet a distance of 43.31 feet (chord North

FILED
2015 JUN 30 AM 11:17

CLERK OF COURT
MAURY COUNTY, CHANCERY CT.

DC&M

¹ STATE OF TENNESSEE, V. THE FOLLOWING DELINQUENT TAXPAYERS AS SHOWN ON THE 2011 REAL PROPERTY DELINQUENT TAX RECORDS OF MAURY COUNTY TENNESSEE, Case No. 13-169-OT, sets date, March 20, 2014, ORDER dated, March 24, 2014.

48 deg. 28 min. East 43.27 feet) to an iron pin set; thence leaving Steve Drive and with Jack K. Moore remaining lands as follows: South 45 deg. 30 min. East 246.28 feet to an iron pipe set, South 55 deg. 20 min. West 190.00 feet to an iron pin set and North 44 deg. 15 min. West 234.90 feet to the point of beginning and containing 1.01 acres as surveyed June 6, 2001 by William J. Reischman RLS # 1315, 6225 Cayce Lane, Columbia, TN. Phone 931-381-9384.

BEING part of the same property conveyed to Jack K. Moore from Karen Moore by deed of record in Book R1489 Page 279, Maury County, Tennessee Register of Deeds.

The above-described property is unimproved property known as: **Steve Dr, Columbia, Tennessee.**

IN WITNESS WHEREOF, Grantor has caused this instrument to be executed on the date first above written.

GRANTOR:

Jack K. Moore
Jack Moore

SS.

STATE OF TENNESSEE)
COUNTY OF DAVIDSON)

BEFORE ME, the undersigned Notary Public of the State and County aforementioned, personally appeared Jack Moore, with whom I am personally acquainted, or proved to me on the basis of satisfactory evidence, and who, upon oath, acknowledged himself to be the within named bargainer, and that he executed the foregoing instrument for the purpose therein contained.

WITNESS my hand and seal, this 28th day of March, 2015.

Julie Coone
Notary Public
My Comm. Exp.: 5-24-17



100% Recycled



30% PCW



100% Recycled 90% PCW



Book No. 1142

WHEREAS, EDD CHAMBERS AND WIFE, MAGGIE CHAMBERS, OUR FATHER AND MOTHER, RESPECTIVELY, WERE FORMERLY THE OWNERS, AS TENANCY BY ENTIRETY OF THE PROPERTY HEREINAFTER DESCRIBED, AND AS SUCH OWNERS THEY DID BY DEED RECORDED IN BOOK 1925, PAGE 317, OF THE REGISTER'S OFFICE FOR DAVIDSON COUNTY, TENNESSEE, CONVEY SAID PROPERTY IN SHARES TO THE UNDERSIGNED ACCORDING TO THE PROVISIONS SET FORTH IN SAID DEED, WHICH DEED AND PROVISIONS IS HEREBY REFERRED TO, AND BY SAID DEED A LIFE ESTATE WAS RESERVED TO THE SAID EDD CHAMBERS AND MAGGIE CHAMBERS, AND

WHEREAS, THE SAID EDD CHAMBERS DIED ON THE 15TH DAY OF SEPTEMBER, 1937, AND OUR MOTHER, MAGGIE CHAMBERS, IS STILL ALIVE AND RESIDING UPON SAID PROPERTY,

NOW THEREFORE, FOR AND IN CONSIDERATION OF THE LOVE AND AFFECTION WHICH WE BEAR TO OUR MOTHER, MAGGIE CHAMBERS, AND IN ORDER TO VEST THE ABSOLUTE TITLE OF SAID PROPERTY IN THE SAID MAGGIE CHAMBERS, AND, FOR AND IN CONSIDERATION OF THE SUM OF ONE (\$1.00) DOLLAR, CASH IN HAND PAID AND THE RECEIPT ON WHICH IS HEREBY ACKNOWLEDGED, BE, THOMAS CHAMBERS, JESSIE CHAMBERS, MARGARET GREGORY AND MARY C. TURNER, HAVE BARGAINED AND SOLD AND DO HEREBY TRANSFER AND CONVEY UNTO THE SAID MAGGIE CHAMBERS, HER HEIRS AND ASSIGNS, ALL OF OUR RIGHT, TITLE AND INTEREST IN AND TO THE FOLLOWING REAL ESTATE IN DAVIDSON COUNTY, TENNESSEE, AS FOLLOWS:

BEING PART OF LOT NO. 29 IN OWEN'S BUENA VISTA PLAN OF LOTS, AS OF RECORD IN BOOK 57 PAGE 26, REGISTER'S OFFICE FOR SAID COUNTY, DESCRIBED AS FOLLOWS:

Said part of lot 29 BEGINS at the southwest corner of 18th AVENUE NORTH and the first ALLEY SOUTH OF SPRING STREET, THENCE WITH THE WESTERLY MARGIN OF SAID AVENUE, SOUTHERLY, 50 FEET; THENCE WESTERLY, PARALLEL WITH SAID ALLEY, 100 FEET; THENCE NORTHERLY, PARALLEL WITH SAID AVENUE, 50 FEET TO THE SOUTHERLY MARGIN OF SAID ALLEY; THENCE EASTERLY, WITH THE SOUTHERLY MARGIN OF SAID ALLEY, 150 FEET TO THE BEGINNING.

BEING THE SAME PROPERTY CONVEYED TO EDD CHAMBERS AND WIFE, MAGGIE CHAMBERS, BY DEED FROM RICHARD D. JONES OF RECORD IN BOOK 869 PAGE 316 OF THE REGISTER'S OFFICE FOR SAID COUNTY.

To Have and to Hold the real tract or parcel of land, with the appurtenances, estate, title, and interest therein belonging to the said,

MAGGIE CHAMBERS, HER

heirs and assigns, forever, even

THE UNDERSIGNED ARE ALL OVER TWENTY-ONE YEARS OF AGE AND ARE THE GRANTEEES IN SAID DEED RECORDED IN BOOK 1925, PAGE 317, OF SAID REGISTER'S OFFICE. IN SAID LATTER DEED MARGARET CHAMBERS IS THE SAME PERSON AS MARGARET GREGORY, HEREIN, AND MARY FLORENCE CHAMBERS IS THE SAME PERSON AS MARY C. TURNER, HEREIN.

WITNESSETH the legal solemnity of this conveyance.

Witness OUR hand S. the 21 day of FEBRUARY 1942

WITNESSETH
THOMAS CHAMBERS JESSIE CHAMBERS
MARGARET C. GREGORY MARY C. TURNER

STATE OF TENNESSEE, DAVIDSON COUNTY.

Personally appeared before me, JAS. K. HEAD, a Notary Public in and for said County and State, the within named THOMAS CHAMBERS MARGARET C. GREGORY AND MARY C. TURNER.

the foregoing S., with whom I am personally acquainted, and who acknowledged to me that they executed the within instrument for the purposes therein contained.

And X wife of the said, having appeared before me privately and apart from the said, jointly, voluntarily, and understandingly, without compulsion or

acknowledging the contents of the said instrument to have been done by the said, jointly, voluntarily, and understandingly, without compulsion or

WITNESS my hand and official seal at Nashville, Tennessee, this 2ND day of MARCH 1942.

Commission Expires - day 10-4-42 JAS. K. HEAD (Seal) Notary Public.

STATE OF ILLINOIS, COUNTY OF COOK
PERSONALLY APPEARED BEFORE ME, WILLIAM J. LAWSON, A NOTARY PUBLIC IN AND FOR SAID COUNTY AND STATE, THE WITHIN NAMED JESSIE CHAMBERS, ONE OF THE BARGAINORS, WITH WHOM I AM PERSONALLY ACQUAINTED AND WHO UPON OATH ACKNOWLEDGED THAT HE EXECUTED THE WITHIN INSTRUMENT FOR THE PURPOSES THEREIN CONTAINED.

WITNESS MY HAND AND OFFICIAL SEAL AT CHICAGO, COOK COUNTY, ILLINOIS, THIS THE 21 DAY OF FEBRUARY, 1942.

(SEAL) WILLIAM J. LAWSON, NOTARY PUBLIC
COM-EX. MCH 1943
2939 W. ADAMS ST, CHICAGO, ILL

REC'D MCH 12, 1942 AT 12:30 P.M.

Book No. 1142

For and to consideration of the sum of \$1.00 ONE AND NO/100 DOLLARS CASH PAID, AND THE FURTHER

CONSIDERATION OF THE GRANTEE ASSUMING AND AGREEING TO PAY A FIRST MORTGAGE OF SIX THOUSAND SEVEN HUNDRED FIFTY AND NO/100 (\$6,750.00) DOLLARS, DATED MARCH 10, 1941, AND BEING SECURED BY A DEED OF TRUST TO MARVIN K. BARRY, TRUSTEE, OF RECORD IN BOOK 1167, PAGE 611 OF THE REGISTER'S OFFICE FOR DAVIDSON COUNTY, TENNESSEE, TOGETHER WITH INTEREST THEREON, AND FURTHER THAT SAID GRANTEE ASSUMES AND AGREES TO PAY A MORTGAGE INDEBTEDNESS OF ONE THOUSAND TWO HUNDRED FIFTY AND NO/100 (\$1,250.00) DOLLARS, DATED MARCH 10, 1941, SECURED BY A DEED OF TRUST TO MARVIN K. BARRY, TRUSTEE, OF RECORD IN BOOK 1178, PAGE 138 SAID REGISTER'S OFFICE, WL. W. P. ROSE AND WIFE, RUTHA BELLE ROSE HAVE BARGAINED AND GOLD, AND BY THESE PRESENTS DO TRANSFER AND CONVEY UNTO THE SAID F. B. OVERTON AND WIFE, FAITH H. OVERTON, THEIR HEIRS AND ASSIGNS, A CERTAIN TRACT OR PARCEL OF LAND IN DAVIDSON COUNTY, TENNESSEE, STATE OF TENNESSEE, DESCRIBED AS FOLLOWS, TO WIT:

BEING THE SOUTHERLY 125 FEET OF LOT NO. 21 ON THE MAP OF FOREST PARK LAND & IMPROVEMENT COMPANY'S SUBDIVISION, OF RECORD IN BOOK 161, PAGE 144, OF THE REGISTER'S OFFICE FOR SAID COUNTY.

SAID PART OF SAID LOT NO. 21 FRONTS 125 FEET ON THE WESTERLY SIDE OF MAPLEWOOD AVENUE AND RUNS BACK BETWEEN PARALLEL LINES 430 FEET TO A DEAD LINE.

BEING THE SAME PROPERTY CONVEYED TO W. P. ROSE AND WIFE, RUTHA BELLE ROSE, BY DEED FROM ARCH BISHOP AND WIFE, ELIZABETH H. BISHOP, OF RECORD IN BOOK 1128, PAGE 648 SAID REGISTER'S OFFICE.

THIS CONVEYANCE IS SUBJECT TO RESTRICTIVE COVENANTS AS SET OUT IN A GENERAL AGREEMENT MADE BY ARCH BISHOP, ET AL, OF RECORD IN BOOK - - PAGE - - SAID REGISTER'S OFFICE.

To Have and to Hold the real tract or parcel of land, with the appurtenances, estate, title, and interest therein belonging to the said,

F. B. OVERTON AND WIFE, FAITH H. OVERTON, THEIR

heirs and assigns, forever, and

F. B. OVERTON AND WIFE, FAITH H. OVERTON

lawfully agreed and proposed of said land to be made, have a good right to convey it, and the same is unencumbered EXCEPT TAXES FOR 1942, WHICH THE GRANTEE HEREIN ASSUMES AND AGREES TO PAY

And WE, W. P. ROSE AND WIFE, RUTHA BELLE ROSE do further covenant and bind OURSELVES, OUR heirs and representatives, to warrant and forever defend the title to said land to the said F. B. OVERTON AND WIFE, FAITH H. OVERTON, THEIR heirs and assigns.

against the lawful claims of all persons whatsoever.

Witness OUR hand S. the 16TH day of JANUARY 1942

WITNESSETH W. P. ROSE

RUTHA BELLE ROSE

STATE OF TENNESSEE, DAVIDSON COUNTY.

Personally appeared before me, MARVIN K. BARRY, a Notary Public in and for said County and State, the within named W. P. ROSE AND WIFE, RUTHA BELLE ROSE.

the foregoing S., with whom I am personally acquainted, and who acknowledged that THEY executed the within instrument for the purposes therein contained.

And X wife of the said, having appeared before me privately and apart from the said, jointly, voluntarily, and understandingly, without compulsion or

acknowledging the contents of the said instrument to have been done by the said, jointly, voluntarily, and understandingly, without compulsion or

WITNESS my hand and official seal at Nashville, Tennessee, this 16 day of JANUARY 1942.

Commission Expires 7 day of JAN 1946 (Seal) MARVIN K. BARRY Notary Public.

REC'D MAR 18, 1942 AT 2:10 P.M.

Last Will and Testament

I, MRS. MAGGIE CHAMBERS, a resident of Nashville, Davidson County, Tennessee, being of sound mind and disposing memory, and considering the uncertainty of this frail and transitory life, do therefore, make, ordain, publish and declare, this to be my LAST WILL AND TESTAMENT.

FIRST I order and direct that my Executor hereinafter named, pay all of my just debts and funeral expenses as soon after my demise as conveniently may be.

SECOND After the payment of such funeral expenses and debts, I Will and Devise my homeplace located at 2131 Eleventh

Avenue North in Nashville, Tennessee, to my son, Jesse Chambers for and during his natural life. The remainder,

I Will and Devise to my daughters, Mary Chambers Turner and Margaret Chambers Gregory, and my son, Thomas Chambers a one-fourth interest each. To my sons, Howard William Chambers and Y. C. Chambers I Will and Devise a one-fourth interest to be divided equally between them.

THIRD I Will and Bequeath all of my household furnishings, cash money and other personal property which I might die seized and possessed of to my children, Mary Chambers Turner, Margaret Chambers Gregory, Jesse Chambers, Thomas Chambers, Howard William Chambers and Y. C. Chambers in equal moieties, share and share alike.

FOURTH I do hereby make, constitute and appoint my son, Jesse Chambers, Executor of this, my LAST WILL AND TESTAMENT, and it is my wish, and I do hereby request that he not be compelled to give any bond as such Executor, and I do hereby revoke all and every former Will by me made.

FILED
2015 JUN 30 AM 11:17

CLERK OF COURT
DAVIDSON COUNTY, TENNESSEE

DC&M

IN WITNESS WHEREOF, I have hereunto subscribed my name,
 this twenty-third day of July in the year of Our Lord, One Thousand
 Nine Hundred and Sixty-three.

Maggie Chambers
 TESTATRIX

This instrument was on the day of the date thereof
 signed, published and declared by the Testatrix, MRS. MAGGIE
 CHAMBERS, to be her LAST WILL AND TESTAMENT, in the presence of
 us who at her request have subscribed our names thereto as wit-
 nesses in her presence, and in the presence of each other.

Lamine Dargatzis
 Witness

333 1/2 4th Ave. N.
 Nashville, Tennessee

L.D. Dargatzis
 Witness

333 1/2 4th Ave. N.
 Nashville, Tennessee

IN THE CHANCERY COURT FOR DAVIDSON COUNTY, TENNESSEE

THE METROPOLITAN GOVERNMENT OF
NASHVILLE AND DAVIDSON COUNTY IN
ITS OWN CAPACITY AND FOR THE USE
AND BENEFIT OF THE STATE OF TENNESSEE,

Plaintiff,

v.

DELINQUENT TAXPAYERS AS SHOWN ON
THE 2011 REAL PROPERTY TAX RECORDS
OF THE METROPOLITAN GOVERNMENT OF
NASHVILLE AND DAVIDSON COUNTY,
TENNESSEE

ESTATE & HEIRS OF CHAMBERS, MAGGIE

Bill No: 67203

Map & Parcel No: 08103024100

RECEIVED

SEP 28 2011

Sec Co. Chancery Court

REAL PROPERTY

Tax Civil Action
No. 13-299-II

2014 OCT -7 PM 2:24
JS

DECREE FOR REDEMPTION

It appearing to this Honorable Court that **ESTATE & HEIRS OF CHAMBERS, MAGGIE**, by and through **CHARLES WALKER, ATTORNEY**, has exercised the right of redemption in accordance with Tenn. Code Ann. § 67-5-2701 and paid into the Court the amount required in order to redeem the property described as:

2131 11TH AVE, NASHVILLE 37208
Map & Parcel No: 08103024100

1. That all the right, title and interest of the purchaser(s), **UP DEVELOPMENT, LLC**, and said parcel of land be divested out of **UP DEVELOPMENT, LLC** and be vested into **ESTATE & HEIRS OF CHAMBERS, MAGGIE**.

2. That, upon request, the Clerk and Master will provide a certified copy of this decree for recording with the Register of Deeds.

The costs of the certified decree will be paid by Defendant and upon application, a writ of possession will issue to put the Defendant in possession of said parcel of land at Defendant's cost.

3. That the purchaser(s) be refunded the purchase amount, interest as called for by law, and all other lawful charges.

THE AMOUNT PAID TO REDEEM
THIS PROPERTY IS \$ 2184.69

Davidson County	ROS
Recvd: 10/10/14 14:21	4 pgs
Fees: 23.00 Taxes: 8.12	
20141010-0094287	

2015 JUN 30 AM 11:18

CLERK AND MASTER
CO. CHANCERY CT.
DC&M

Carol M. Cox
CHANCELLOR

Approved for Entry:

THE DEPARTMENT OF LAW OF THE METROPOLITAN
GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY
SAUL SQUIMON, #11689, DIRECTOR OF LAW

Jason P. Bobo
J. Brooks Fox, # 16096
Margaret O. Darby, #20701
Jason P. Bobo, #29756
Assistant Metropolitan Attorneys
Metropolitan Courthouse, Suite 108
P. O. Box 196300
Nashville, TN 37219
(615) 862-6343
Attorneys for Plaintiff

I hereby certify that this is a true copy
of original instrument filed in my office.

This 9th day of October, 2014
By CRISTI SCOTT, Clerk
Deputy

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing *Decree for Redemption* were forwarded by U.S. Mail
to the following this 25th day of September, 2014.

[ESTATE & HEIRS OF CHAMBERS, MAGGIE
C/O CHARLES WALKER, ATTORNEY
69 THOMPSON LANE Sandra Taylor
NASHVILLE, TN 37211 New Owner]

UP DEVELOPMENT, LLC
5810 VINE RIDGE DR
NASHVILLE, TN 37205

ESTATE & HEIRS OF CHAMBERS, MAGGIE
2412 EDEN ST
C/O THOMAS CHAMBERS
NASHVILLE, TN 37208

METRO MAIL
Metropolitan Assessor
Metropolitan Trustee

Jason P. Bobo
JASON P. BOBO

CLANCY COURT
DAVIDSON COUNTY
OFFICE OF CLERK AND MASTER
NASHVILLE, TENNESSEE

METROPOLITAN GOVERNMENT, ETC

13-299-II VS. 08103024100 67203

DELINQUENT TAXPAYERS ETC.
(MAGGIE CHAMBERS)

TO: UP DEVELOPMENT, LLC
5810 VINE RIDGE DRIVE
NASHVILLE, TN 37208

2014 AUG 22 PM 4: 06

CLERK & MASTER
CL. CHANCERY CT
CP DC&M

NOTICE OF REDEMPTION PROCESS

YOU ARE HEREBY NOTIFIED THAT ON 8/22/2014, FUNDS WERE TENDERED TO REDEEM THE PROPERTY SOLD IN THIS CAUSE. You have 30 days from the date of the tender to file the attached claim requesting additional amounts to be paid to compensate you for any lawful charges or monies you have expended to preserve the value of the property. If you protest the redemption on other grounds, you must explain your objection in papers filed with the Clerk and Master pursuant to the Tennessee Rules of Civil Procedure.

CRISTI SCOTT, CLERK & MASTER

BY Cristi Scott
Deputy Clerk and Master

DATE 8/22/14

Payer of Funds to Redeem:
CHARLES WALKER, ATTORNEY FOR
ESTATE OF MAGGIE CHAMBERS
69 THOMPSON LANE
NASHVILLE, TN 37211

Purchase Price: \$4,000.00
Date Purchase Paid: 11/27/13
Redemption Date: 8/22/14
Redemption Amount Paid: \$2,219.99
Interest to Date: \$295.90

2014 SEP -8 AM 9:33
METRO DEPT. OF LAW

OATH OF CONSIDERATION:

SS.
STATE OF TENNESSEE
COUNTY OF DAVIDSON
THE ACTUAL CONSIDERATION FOR THIS TRANSFER IS \$

2194.99

SWORN TO AND SUBSCRIBED BEFORE ME THIS 9th DAY OF October 2014.

AFFIANT

Julie Coone
NOTARY PUBLIC
MY COMMISSION EXPIRES: 5-24-17



CERTIFICATE OF AUTHENTICITY

I, Charles Walker, do hereby make oath that I am a licensed attorney and/or the custodian of the electronic version of the attached document tendered for registration herewith and that this is a true and correct copy of the original document executed and authenticated according to law.

State of Tennessee
County of Davidson

CHARLES WALKER

Personally appeared before me, Julie Coone, a notary public for this county and state, Charles Walker, who acknowledges that this certification of an electronic document is true and correct and whose signature I have witnessed.



Julie Coone
JULIE COONE, NOTARY PUBLIC
My commission expires: May 24, 2017

QUITCLAIM DEED Davidson County DEEDOC 3 pgs Recvd: 10/10/14 15:30 Fee: 12.00 Taxes: 37.00 20141010-0094357		OATH OF CONSIDERATION: SS. STATE OF TENNESSEE COUNTY OF DAVIDSON THE ACTUAL CONSIDERATION FOR THIS TRANSFER IS \$ <u>10,000</u>	
THIS INSTRUMENT PREPARED BY: WALKER, CHAMBERS & GREGORY 69 THOMPSON LANE NASHVILLE, TENNESSEE 37211 OFFICE (615) 463-3760		MAP-PARCEL NUMBER(S): 08103024100	
ADDRESS OF NEW OWNER(S): REO Holdings, LLC 69 Thompson Lane Nashville, Tennessee 37211		SEND TAX BILLS TO: Same	

QUITCLAIM DEED

THIS INSTRUMENT, made and entered into this 10th day of October, 2014, by and between Dorothy M. Fyke a/k/a Dorothy Turner Luffine, duly appointed, qualified and acting Trustee under the terms of the will of Maggie Merritt Turner Chambers ("Grantor") and REO Holdings, LLC, a Tennessee Limited Liability Company ("Grantee");

WITNESSETH:

FOR AND IN CONSIDERATION of the sum of ten dollars (\$10) and other good and valuable consideration, the receipt and legal sufficiency of which are hereby acknowledged, Grantor does hereby convey, transfer, remise, release, relinquish and quitclaim unto Grantee, Grantee's heirs and assigns, all of Grantors' right, title and interest, in and to the following described real estate in Davidson County, State of Tennessee, to-wit:

Being part of Lot No. 29 in Owen's Buena Vista Plan of Lots, as of record in Book 57 Page 26, Register's Office for Davidson County, Tennessee, described as follows: Said part of Lot No. 29 begins at the Southwest corner of 11th Avenue North and the first alley South of Spring Street; Thence with the Westerly margin of said avenue, Southerly, 50 feet; Thence Westerly parallel with said alley, 140 feet; Thence Northerly, parallel with said Avenue, 50 feet to the Southerly margin of said alley; Thence Easterly, with the Southerly margin of said alley, 140 feet to the beginning.

Being the same property conveyed to Maggie Chambers by Deed recorded on March 12, 1942, from Thomas Chambers, Margaret C. Gregory, Jessie Chambers and Mary C. Turner in Book 1142 Page 682, Register's Office for Davidson County, Tennessee; Decree for Redemption recorded at Instrument # 20141010-00094287, Register's Office for Davidson County, Tennessee.

The above-described property is unimproved property known as: 2131 11th Avenue North, Nashville, Tennessee

FILED
 2015 JUN 30 AM 11:18
 CLERK AND MASTER
 DAVIDSON CO. CHANCERY CT.
 DC&M

IN WITNESS WHEREOF, Grantor has caused this instrument to be executed on the date first above written.

GRANTOR:

Dorothy M. Fyke
Dorothy M. Fyke
Trustee of the Trust created by
Will of Maggie Merritt Turner Chambers'

STATE OF TENNESSEE

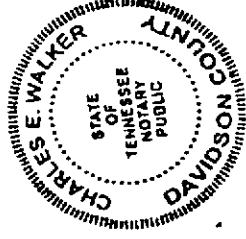
COUNTY OF DAVIDSON

Personally appeared before me, Charles E. Walker, a Notary Public in and for said County and State, Dorothy M. Fyke, the within named bargainer, with whom I am personally acquainted (or proved to me on the basis of satisfactory evidence), and who acknowledged that he/she executed the within instrument for the purposes therein contained.

Witness my hand, at office, this 10th day of October, 2014

My Commission Expires: July 3, 2017

Notary Public



¹ Probate Court of Davidson County, Tennessee entered an order on July 28, 1969, order and will appear of Record in Will Book 88, Page 448, Probate Court Clerk's Office for Davidson County, Tennessee, to which reference is here made.

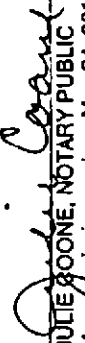
CERTIFICATE OF AUTHENTICITY

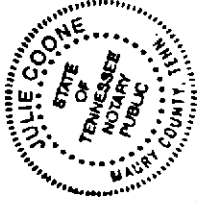
I, Charles Walker, do hereby make oath that I am a licensed attorney and/or the custodian of the electronic version of the attached document tendered for registration herewith and that this is a true and correct copy of the original document executed and authenticated according to law.


CHARLES WALKER

State of Tennessee
County of Davidson

Personally appeared before me, Julie Coone, a notary public for this county and state, Charles Walker, who acknowledges that this certification of an electronic document is true and correct and whose signature I have witnessed.


JULIE COONE, NOTARY PUBLIC
My commission expires: May 24, 2017



QUITCLAIM DEED 		OATH OF CONSIDERATION: SS. STATE OF TENNESSEE COUNTY OF DAVIDSON THE ACTUAL CONSIDERATION FOR THIS TRANSFER IS \$ <u>2300</u> SWORN TO AND SUBSCRIBED BEFORE ME THIS <u>23rd</u> DAY OF <u>DECEMBER</u>, 2014. MY COMMISSION EXPIRES: <u>5-24-17</u> <i>Julie C. Come</i> NOTARY PUBLIC
THIS INSTRUMENT PREPARED BY: WALKER LAW OFFICES 69 THOMPSON LANE NASHVILLE, TENNESSEE 37211 OFFICE: (615) 463-3760		
ADDRESS OF NEW OWNER(S): REO Holdings, LLC 69 Thompson Lane Nashville, Tennessee 37211	SEND TAX BILLS TO: Same	MAP-PARCEL NUMBER(S): 08103024100

QUITCLAIM DEED

THIS INSTRUMENT, made and entered into this 23 day of December, 2014, by and between Alice Marie Smith a/k/a Alice Marie Williams ("Grantor") and REO Holdings, LLC, a Tennessee Limited Liability Company ("Grantee");

WITNESSETH:

FOR AND IN CONSIDERATION of the sum of ten dollars (\$10) and other good and valuable consideration, the receipt and legal sufficiency of which are hereby acknowledged, Grantor does hereby convey, transfer, remise, release, relinquish and quitclaim unto Grantee, Grantee's heirs and assigns, all of Grantors' right, title and interest, in and to the following described real estate in Davidson County, State of Tennessee, to-wit:

Being part of Lot No. 29 in Owen's Buena Vista Plan of Lots, as of record in Book 57 Page 26, Register's Office for Davidson County, Tennessee, described as follows: Said part of Lot No. 29 begins at the Southwest corner of 11th Avenue North and the first alley South of Spring Street; Thence with the Westerly margin of said avenue, Southerly, 50 feet; Thence Westerly parallel with said alley, 140 feet; Thence Northerly, parallel with said Avenue, 50 feet to the Southerly margin of said alley; Thence Easterly, with the Southerly margin of said alley, 140 feet to the beginning.

Source of Grantor's equitable interest is Will Book 88, Page 448, Probate Clerk's Office for Davidson County, Tennessee.

The above-described property is unimproved property known as: 2131 11th Avenue North, Nashville, Tennessee

IN WITNESS WHEREOF, Grantor has caused this instrument to be executed on the date first above written.

Davidson County	DEEDQC
Rec'd: 10/23/14 13:30	2 pgs
Fees: 12.00 Taxes: 0.00	
20141023-0097973	

GRANTOR:

Alice Marie Smith
Alice Marie Smith

FILED

2015 JUN 30 AM 11:18

CLERK AND MASTER
DAVIDSON CO. CHANCERY CT.

WJ DC&M

STATE OF TEXAS

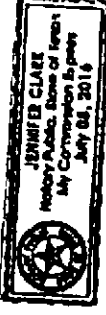
COUNTY OF DENTON

Personally appeared before me, Jennifer Clark, a Notary Public in and for said County and State, Alice Smith, the within named bargainer, with whom I am personally acquainted (or proved to me on the basis of satisfactory evidence), and who acknowledged that he/she executed the within instrument for the purposes therein contained.

Witness my hand, at office, this 22 day of October, 2014.

My Commission Expires: July 5, 2016

Notary Public



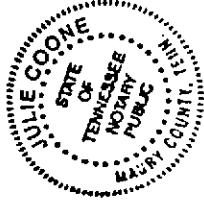
CERTIFICATE OF AUTHENTICITY

I, Charles Walker, do hereby make oath that I am a licensed attorney and/or the custodian of the electronic version of the attached document tendered for registration herewith and that this is a true and correct copy of the original document executed and authenticated according to law.

State of Tennessee
County of Davidson

CHARLES WALKER

Personally appeared before me, Julie Coons, a notary public for this county and state, Charles Walker, who acknowledges that this certification of an electronic document is true and correct and whose signature I have witnessed.



Julie Coons
JULIE COONS, NOTARY PUBLIC
My commission expires: May 24, 2017

100% Recycled



50% PCW



Maggie Morritt Turner Chambers, Probated July 28, 1967

Last Will and Testament

MAGGIE MORRITT TURNER CHAMBERS

I, Maggie Morritt Turner Chambers, a resident citizen of Davidson County, Tennessee, do hereby make, publish, and declare this to be my last Will and Testament, and I hereby revoke all former wills and codicils made by me.

ITEM ONE: All estate, inheritance, and succession taxes assessable by reason of my death, and all funeral expenses and other expenses relative to administering my estate, shall be paid by my executor, or executrix, as soon as practicable after my death.

ITEM TWO: I give, devise and bequeath to my daughter, Dorothy Turner Haffino, if she survives me, Twenty Five and no/100 (\$25.00) Dollars.

ITEM THREE: I give, devise and bequeath to my daughter, Hazel Johnson, if she survives me, Twenty Five and no/100 (\$25.00) Dollars.

ITEM FOUR: I give, devise, and bequeath to my son, Hardy Turner, if he survives me, Twenty Five and no/100 (\$25.00) Dollars.

ITEM FIVE: I give, devise and bequeath to one of my grand daughters, Alice Marie Williams, who is about nine years of age at the time of the making of this Will, all the rest, residue and remainder of my property, both real and personal, and mixed, of whatever nature, and wherever situated, after the satisfaction of Items One, Two, Three, Four, above, and specifically my house and lot at 518 South 14th Street, Nashville, Davidson County, Tennessee, and my home trailer, a Chevy II, which measures 12 feet by 43 feet, to be hers absolutely.

However, if the said Alice Marie Williams has not reached the age of twenty one (21) years at the time of my death, then all property enumerated in this Item Five shall vest in the Trustee hereinafter named for the use and benefit of said granddaughter, upon the following uses, trusts, and conditions:

My Trustee shall hold the trust property and in my Trustee's discretion shall maintain said property, and/or sell such parts thereof as she may deem reasonable or necessary. My Trustee shall rent said house and home trailer at the highest and best advantage, and

PAGE ONE OF THE LAST WILL AND TESTAMENT OF

MAGGIE MORRITT TURNER CHAMBERS

paying all necessary expenses incident thereto, and retaining the rents and profits therefrom in a Federal Savings and Loan Association until Alice Marie Williams shall have reached the age of twenty one (21) years, at which time the corpus of said trust, together with the profits thereof, shall be delivered, free of the trust which shall end, to the said Alice Marie Williams, or her descendants or natural heirs.

I direct that the interests of the beneficiary of the trust herein created shall not be subject to, or liable in any manner to or for any pledge, assignment, debt, contract, or engagement or liability incurred by said beneficiary.

ITEM SIX: It is my intention that all of the assets of my estate, specifically including any insurance proceeds which may become a part of my estate, be distributed according to the terms of this Last Will and Testament,

and that I not die partially intestate.

WITNESSES I hereby nominate and appoint my daughter, Dorothy Turner Rufflee, an executrix of my estate. In event she predeceases me, or refuses or ceases to serve for any reason, I then appoint, nominate and constitute my attorney, Leslie Dale, to serve as Executor of this estate. If it is necessary that the trust be created as hereinbefore provided, I then nominate and appoint Dorothy Turner Rufflee as Trustee under this Will. I excuse my executrix, executor, and trustee from giving bond and surety and from making reports to, or qualifying in any court. Successor executors and trustees shall have the same powers and limitations as the executors and trustees first named herein, but my trust in appointing a successor or substitute trustee not herein named my regular or reserve bond in its discretion.

I express my authority and empower my executrix, executor, and or trustee to sell, execute, sign, or otherwise transfer my and my heirs of real estate or personal property by bill of sale, deed, or other instrument necessary to carry out the terms of this Will.

This Will is typewritten on three (3) pages, (including the attestation page) each identified by my "X" mark.

In witness whereof, I have hereunto set my hand and seal to this, my last will, and testament, at Nashville, Tennessee, on the 29th day of April, 1967.

Elisette Morris (X) Turner Chambers
WIDOW, RESIDENT 10424 CHURCH, NASHVILLE

BACK TWO OF THE LAST WILL AND TESTAMENT OF

WIDOW, RESIDENT 10424 CHURCH

The foregoing instrument was signed, published and declared by the

said Elisette Morris Turner Chambers, as and for her last will and testament,

in the joint sight and presence of the undersigned, who at her request, and in her sight and presence, and in the sight and presence of each other, have hereunto subscribed our names as attesting witnesses thereto the day and year last then mentioned.

Mrs. Ralph E. Owsen, Jr.
Name

1520 Huntington Lane
Address

Stephen W. Jackson
Name

907 Thomas St
Address

W. C. Wolfe
Name

1211 Montross Dr.
Address

PAGE THREE OF THE LAST WILL AND TESTAMENT OF

WIDOW, RESIDENT 10424 CHURCH

IN THE CHANCERY COURT FOR DAVIDSON COUNTY, TENNESSEE
PART III

REO HOLDINGS, LLC, a Tennessee Limited
Liability Company,

PLAINTIFF,

v.

THOMAS CHAMBERS,
2412 Eden Street, Nashville, Tennessee,

VINDA CHAMBERS,
2412 Eden Street, Nashville, Tennessee,

JESSEE CHAMBERS,

MARY CHAMBERS TURNER,

MARGARET CHAMBERS GREGORY,

HOWARD WILLIAM CHAMBERS,

Y.C. CHAMBERS,

UNNAMED OR UNKNOWN HEIRS OF
MAGGIE CHAMBERS,

DEFENDANTS.

IN REM:

MAP & PARCEL NO. 08103024100 m/K/a 2131
11th Avenue North
Nashville, Tennessee, 37208

COMPLAINT FOR DECLARATORY JUDGMENT TO QUIET TITLE

COMES NOW the Plaintiff, REO Holdings, LLC, a Tennessee Limited Liability Company (hereinafter "REO") and files this Complaint for Declaratory Judgment to Quiet Title to unimproved land in Davidson County, Tennessee, Map and Parcel No. 08103024100, municipally known as 2131 11th Avenue North, Nashville, Tennessee 37208, in Petitioner, REO, as follows:



ORIGINAL

CASE NO.: 15-30-III

2015 JAN -9 AM 10:10
CLERK OF COURT
DC&M

DECLARATORY
JUDGMENT

2015 JUN 30 AM 11:18
CLERK OF COURT
DC&M

PARTIES:

1. REO is, and at all times mentioned herein, a Tennessee Limited Liability Company, with its principal office in Davidson County, Tennessee.
2. REO is the fee simple owner of the property municipally known as 2131 11th Avenue North, Nashville, Tennessee, 37208, evidenced by Exhibit A hereto.
3. Thomas Chambers, upon information and belief, resides in Davidson County, Tennessee, at 2412 Eden Street, Nashville, Tennessee, 37208.
4. Vinda Chambers, upon information and belief, resides in Davidson County, Tennessee, at 2412 Eden Street, Nashville, Tennessee, 37208.
5. Jesse Chambers, upon information and belief, son of Maggie Chambers, his address is unknown and remains unknown after diligent inquiry.
6. Mary Chambers Turner, upon information and belief, daughter of Maggie Chambers, her address is unknown and remains unknown after diligent inquiry.
7. Margaret Chambers Gregory, upon information and belief, daughter of Maggie Chambers, her address is unknown and remains unknown after diligent inquiry.
8. Howard William Chambers, upon information and belief, son of Maggie Chambers, his address is unknown and remains unknown after diligent inquiry.
9. Y.C. Chambers, upon information and belief, son of Maggie Chambers, his address is unknown and remains unknown after diligent inquiry.

10. Known and unknown heirs of Maggie Chambers deceased December 18, 1971, delinquent inquiry has been made to ascertain the identity and residence of other potential heirs, if any.

JURISDICTION:

11. This Court has jurisdiction pursuant to Tennessee Code Annotated § 29-14-101 through §113.

VENUE:

12. Venue is proper in Davidson County, Tennessee, pursuant to Tennessee Code Annotated § 16-11-114.

PREDICATE FACTS:

13. REO Holdings, LLC, received the fee simple estate in the property described in (¶ 2) herein from The Estate and Heirs of Maggie Chambers out of a delinquent tax sale proceeding, Davidson County Chancery Court, Tax Civil Action, No. 13-299-II.

ACTIONABLE FACTS:

14. Subsequently, an examination of the title revealed that the above Defendants may have a legal or equitable interest in or claim to the property described in (¶ 2).

WHEREFORE, the Petitioner, REO, requests judgment as follows:

- A. THAT this court adjudge and decree REO Holdings, LLC, is the true and lawful owner in fee simple of the property described in (¶ 2).
- B. THAT **THOMAS CHAMBERS, VINDA CHAMBERS. JESSEE CHAMBERS, MARY CHAMBERS TURNER, MARGARET**

CHAMBERS GREGORY, HOWARD WILLIAM CHAMBERS, Y.C.
CHAMBERS, UNNAMED OR UNKNOWN HEIRS OF MAGGIE
CHAMBERS, be adjudged to have no right, title, estate, lien or interest in or
to the property described in (§ 2).

C. THAT this court grant all other and further relief deemed proper.

DATED: January 9, 2015



Charles Walker, BPR #021277
Attorney for Plaintiff
69 Thompson Lane
Nashville, Tennessee 37211
Office: (615) 463-3760
Fax: (615) 383-1154

VERIFICATION OF COMPLAINT:

S.S.
State of Tennessee
County of Davidson

Comes now my Affiant and having first been duly sworn does hereby depose and say:

I, John Davidson, am the duly authorized acting member for REO Holdings, LLC, a Tennessee Limited Liability Company, and do hereby declare that I am authorized to act on behalf of REO Holdings, LLC, and I have personal knowledge of the facts set forth herein and do make oath the same is true and correct to the best of my knowledge and belief.

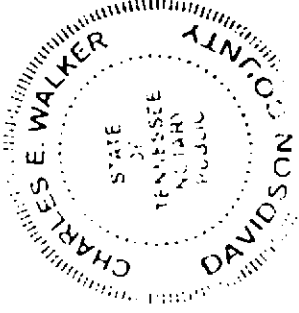
REO HOLDINGS, LLC

By: [Signature]
Its Duly Authorized Acting Member

Sworn to and subscribed before me this 6th day of January, 2015.

[Signature]

Notary Public
My Commission Expires: 7-3-2017



**I AM SURETY FOR COSTS
NOT TO EXCEED \$1,000:**

[Signature]

Charles Walker, BPR # 021277
69 Thompson Lane
Nashville, Tennessee 37211
Office: (615) 463-3760
Fax: (615) 383-1154

100% Recycled 30% PCW



WARRANTY DEED  G-KW-06-2501		STATE OF Tennessee COUNTY OF Davidson THE ACTUAL CONSIDERATION OR VALUE, WHICHEVER IS GREATER, FOR THIS TRANSFER IS \$95,000.00 Subscribed and sworn to before me, the 30th day of November, 2006 Affiant: <i>Daniel Z. Heller</i> Notary Public MY COMMISSION EXPIRES 5/22/10 (AFFIX SEAL)	
THIS INSTRUMENT WAS PREPARED BY Rudy Tyle and Escrow 2012 21st Ave South Nashville, TN 37212			
ADDRESS NEW OWNERS AS FOLLOWS (NAME) Annamma K. Augustine		SEND TAX BILLS TO Realty Mortgage Corporation	MAP/PARCEL NUMBERS
2501 Inga Street ADDRESS Nashville, TN 37206	(CITY) (STATE) (ZIP) 215 Katherine Drive ADDRESS Flowood, MS 39232	(NAME) 72-9-357.00	

For and in consideration of the sum of TEN DOLLARS, cash in hand, paid hereinafter named Grantee(s), and other good and valuable considerations, the receipt of which is hereby acknowledged, we DANIEL Z. HELLER, *WITNESSES*, hereinafter called the Grantor(s), have bargained and sold, and by these presents do transfer and convey unto ANNAMMA K. AUGUSTINE hereinafter called the Grantee(s), their heirs and assigns, that certain tract or parcel of land in DAVIDSON COUNTY, STATE OF TENNESSEE, described as follows, to wit:

SITUATED IN DAVIDSON COUNTY, TENNESSEE AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS: LOTS 93 AND 94 OF THE PLAN OF SPRINGDALE SUBDIVISION, AS SHOWN BY A MAP OF RECORD IN PLAT BOOK 974 AT PAGE 18 IN THE DAVIDSON COUNTY, TENNESSEE REGISTER OF DEEDS OFFICE, ALONG WITH A 25 FOOT ADJOINING STRIP LYING TO THE SOUTH OF SAID LOTS WHICH FRONTS 25 FEET ON THE WEST BOUNDARY OF INGA STREET AND GOES BACK BETWEEN PARALLEL LINES 137 FEET MORE OR LESS, TO A LINE IN THE REAR MEASURING 25 FEET THEREON

BEING THE SAME PROPERTY CONVEYED TO DANIEL Z. HELLER BY GENERAL WARRANTY DEED FROM CECILIA M. MARTIN, RECORDED ON THE 21ST DAY OF AUGUST, 2002 IN INSTRUMENT NO. 20020821-0101033, IN THE REGISTER'S OFFICE OF DAVIDSON COUNTY, TENNESSEE.

This conveyance is subject to a) 2006 property taxes; b) instruments of record in Book 974, Page 18, said Register's Office; and c) any and all existing easements and restrictions as shown of record not stated herein.

* *unmarried*

unimproved ()

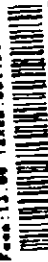
This is improved (X) property, known as 2501 Inga Street, Nashville, Tennessee 37206
 (House Number) (Street) (P.O. Address) (City or Town) (Postal ZIP)

TO HAVE AND TO HOLD the said tract or parcel of land, with the appurtenances, estate, title and interest thereto belonging to the said GRANTEE(S), their heirs and assigns forever, and we do covenant with the said GRANTEE(S) that we are lawfully seized and possessed of said land in fee simple, have a good right to convey it and the same is unencumbered, unless otherwise herein set out, and we do further covenant and bind ourselves, our heirs and representatives, to warrant and forever defend the title to the said land to the said GRANTEE(S), their heirs and assigns, against the lawful claims of all persons whomsoever. Wherever used, the singular number shall include the plural, the plural the singular, and the use of any gender shall be applicable to all genders.

Witness my four hands this 30th day of November, 2006.

Daniel Z. Heller
 Daniel Z. Heller

Davidson County DEEDBOOK
 Rec'd: 12/05/06 12:05 2 pgs
 Fees: 13.00 Taxes: 351.56



20061205-0149942

FILED
 2005 JUN 30 AM 11:18
 CLERK AND MASTER
 DAVIDSON COUNTY, TENNESSEE
[Signature] DC&M

STATE OF Tennessee
COUNTY OF Davidson

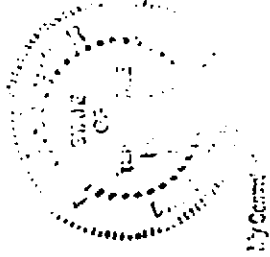
Personally appeared before me, the undersigned, a Notary Public in and for said County and State, Daniel Z. Heller, the within named bargainer, with whom I am personally acquainted (or proved to me on the basis of satisfactory evidence), and who acknowledged that he/she/they executed the within instrument for the purposes therein contained.

Witness my hand and official seal, this the 30th day of November, 2008


Notary Public

My Commission Expires:
(SEAL)

RETURN TO:
Rudy Title and Escrow
2012 21st Ave South
Nashville, TN 37212
Phone: (615)383-2903



QUITCLAIM DEED

Davidson County DEEDQC
Rec'd: 02/26/15 14:27 2 pgs
Fees: 13.00 Taxes: 25.90
20150226-0016785

OATH OF CONSIDERATION:

SS. STATE OF TENNESSEE
COUNTY OF DAVIDSON
THE ACTUAL CONSIDERATION OR FAIR MARKET
VALUE WHICHEVER IS GREATER FOR THIS TRANSFER
IS \$ 3000.00

AFFIANT

SWORN TO AND SUBSCRIBED BEFORE ME THIS 27th
DAY OF FEBRUARY 2015.

NOTARY PUBLIC

MY COMMISSION EXPIRES

THIS INSTRUMENT PREPARED BY:

WALKER LAW OFFICES
69 THOMPSON LANE
NASHVILLE, TENNESSEE 37211
OFFICE: (615) 463-3760

ADDRESS OF NEW OWNER(S):

REO Holdings, LLC
69 Thompson Ln
Nashville, Tennessee 37211

SEND TAX BILLS TO:

Same

MAP-PARCEL NUMBER(S):

07209035900

QUITCLAIM DEED

THIS INSTRUMENT, made and entered into this 27th day of February, 2015, by
and between, Annamma K. Augustine, ("Grantor") and REO Holdings, LLC, a
Tennessee Limited Liability Company, ("Grantee");

WITNESSETH:

FOR AND IN CONSIDERATION of the sum of ten dollars (\$10) and other good and
valuable consideration, the receipt and legal sufficiency of which are hereby
acknowledged, Grantor does hereby convey, transfer, remise, release, relinquish and
quitclaim unto Grantee, Grantee's heirs and assigns, all of Grantor's right, title and
interest, specifically including his statutory right of redemption arising from the tax sale
confirmed by Decree of the Davidson County Chancery Court entered on January 22,
2014¹, in and to the following described real estate in Davidson County, State of
Tennessee, to-wit:

LOT 94 of the Plan of Springdale Subdivision, as shown by a map of
record in Plat Book 974 at Page 18 in the Davidson County, Tennessee,
Register of Deeds Office, along with a 25 foot adjoining strip lying to
the south of said lot which fronts 25 feet on the west boundary of Inga
Street and goes back between parallel lines 137 feet more or less, to a
line in the rear measuring 25 feet thereon.

Being the same property conveyed to Annamma K. Augustine, from
Daniel Z. Heller, unmarried, dated November 30th, 2006, recorded on
December 5, 2006, in Instrument # 20061205-0149942, Register's
Office of Davidson County, Tennessee.

The above-described property is unimproved property known as: 0 Inga Street
Nashville, Tennessee.

IN WITNESS WHEREOF, Grantor has caused this instrument to be executed on the
date first above written.

FILED
2015 JUN 30 AM 11:18

CLERK OF COURT
DAVIDSON COUNTY, TENNESSEE
CHANCERY COURT
0 Inga Street

¹ Davidson County Chancery Court Tax Civil Action No. 13-299-11, recorded in Instrument No. 20140624-0055151, Register's Office
of Davidson County, Tennessee.

GRANTOR:

Annamma K. Augustine
ANNAMMA K. AUGUSTINE

SS.
STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES)

BEFORE ME, the undersigned Notary Public of the State and County aforementioned, personally appeared ANNAMMA K. AUGUSTINE, with whom I am personally acquainted, or proved to me on the basis of satisfactory evidence, and who, upon oath, acknowledged herself to be the within named bargainer, and that she executed the foregoing instrument for the purpose therein contained.

WITNESS my hand and seal, this 24 day of FEBRUARY, 2015.

Francis J. Mond
NOTARY PUBLIC

MY COMMISSION EXPIRES:



CERTIFICATE OF AUTHENTICITY

I, Charles Walker, do hereby make oath that I am a licensed attorney and/or the custodian of the electronic version of the attached document tendered for registration herewith and that this is a true and correct copy of the original document executed and authenticated according to law.

Charles Walker
CHARLES WALKER

State of Tennessee
County of Davidson

Personally appeared before me, Julie Coone, a notary public for this county and state, Charles Walker, who acknowledges that this certification of an electronic document is true and correct and whose signature I have witnessed.

Julie Coone
JULIE COONE, NOTARY PUBLIC
My commission expires: May 24, 2017





Last Will and Testament

BILL GARRETT, Davidson County
Trans: T20100054210 WILL
Recvd: 00/31/10 10:10 5 pss
Fees: 27.00 Taxes: 0.00

VERNON IRENE BOTTOMS



20100831-0068981

I, VERNON IRENE BOTTOMS, a resident of Nashville, Davidson County, Tennessee, being of lawful age, sound and disposing mind and memory, do hereby make, publish and declare this my Last Will and Testament, revoking and rendering null and void all other prior wills and codicils heretofore made by me.

SECTION ONE

FAMILY AND/OR BENEFICIARIES

Paragraph 1.1 **FAMILY**. At the time of the execution of this will, I have no spouse. My family consists of my son, Howard Bottoms. I also have two grandchildren, David Bottoms and Joshua Bottoms and four great-grandchildren. By my own decision, I am leaving the property to those listed herein and am specifically choosing not to leave any of my property to my some of my heirs except as set forth herein.

SECTION TWO

APPOINTMENT OF PERSONAL REPRESENTATIVE Paragraph 2.1: APPOINTMENT OF PERSONAL REPRESENTATIVE.

I hereby appoint David Bottom, my grandson, as the Personal Representative of my Last Will and Testament. I authorize and empower said Personal Representative to sell, convey, mortgage, invest, reinvent, exchange, manage control or otherwise deal with any and all property, whether real, personal or mixed, comprising my estate,

15 JUN 30 AM 11:18

CLERK OF SUPERIOR COURT
DAVIDSON COUNTY, TENNESSEE

DC & M

FILED

intending to grant such powers over such property as I might exercise if I were alive provided that such is in the best interest of the beneficiaries of this my Last Will and Testament. I authorize and empower my Personal Representative to exercise, any or all of the powers set forth in Tennessee Code Annotated Section 35-50-110, or any amendment thereto, which is incorporated herein by reference as fully as though set out verbatim. My Personal Representative shall serve without bond and inventory and an accounting expressly waived.

SECTION THREE

PAYMENT OF DEBTS, EXPENSES AND TAXES

Paragraph 3.1 I direct my Personal Representative to pay all my just debts including my funeral expenses, as well as the costs of expenses of administering my estate, as soon after my death as practicable. I further direct the Personal Representative to pay all estate, inheritance and death taxes that shall be imposed and which shall be payable out of my estate.

SECTION FOUR

DISPOSITION OF REAL, PERSONAL AND

HOUSEHOLD EFFECTS

Paragraph 4.1 **DISPOSITION OF REAL PROPERTY.** To my grandson David Bottoms I convey my property at 3501 and 3503 Mays Street, Nashville, Davidson County, Tennessee, 37211 to hold the same as Trustee for the benefit of my great granddaughter Lani Jade Bottoms until such time that she reaches the age of eighteen (18) at which time the property shall be conveyed to her.

Paragraph 4.2. **SPECIFIC BEQUEST.** Upon my death, I convey to the following individuals the personal property listed beside their name:

A. Howard Bottoms: the sum of Three Hundred dollars (\$300.00);

B. Joshua Bottoms: All of my Jeff Gordon memorabilia.

Paragraph 4.3 **RESIDUARY DISPOSITION OF PROPERTY.** All the rest and residue of my estate, of every kind and character, whether the same be real, personal or mixed, and wherever situated, I give, devise and bequeath to my grandson David Bottoms.

Paragraph 4.4 **COMMON DISASTER.** In the event that any beneficiary under this Will and I or any other person upon whose death such beneficiary shall become entitled to receive part of my estate under this Will, shall die in a common accident, disaster or epidemic, or under such circumstances that it is difficult or impractical to determine who survived the other, then I direct that for the purposes of this Will, such beneficiary shall be deemed to have predeceased me or any other person upon whose death such beneficiary shall become entitled to receive part of my estate under this Will. Further, in the event that any beneficiary under this Will does not survive me by ten (10) days, then I direct that for the purposes of this Will, such beneficiary shall be treated under this Will in the same manner as if they had predeceased me.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal on this the 2nd day of September, 2009 at Nashville, Tennessee.

Vernon Bottoms
VERNON IRENE BOTTOMS

AFFIDAVIT OF WITNESSES

State of Tennessee

County of Davidson

We, the undersigned, having been duly sworn, depose and say that

VERNON IRENE BOTTOMS on this the 2ND day of September, 2009

(hereinafter referred to as "Testator") presented to us this document which she acknowledged to be her Last Will and Testament. She signed and subscribed her name as Testator thereto in our sight and presence. The Testator published and declared this document to be her Last Will and Testament and requested that we subscribe our names thereto and attest his execution of the same. All of us, in the Testator's sight and presence and in the sight and presence of each other, signed and subscribed our names thereto as such attesting and subscribing witnesses. The Testator was more than eighteen (18) years of age and appeared to be of sound mind and disposing memory at the time she executed said instrument as her Last Will and Testament. The two of us were each more than eighteen (18) years of age when we signed as such attesting and subscribing witnesses. A copy of this Affidavit is attached to said Last Will and Testament and the Affidavit has been executed pursuant to Tennessee Code Annotated Section 32-1-104 and at the request of the

Testator.

Marsha Kinster
Name

Shirley McEulen
Name

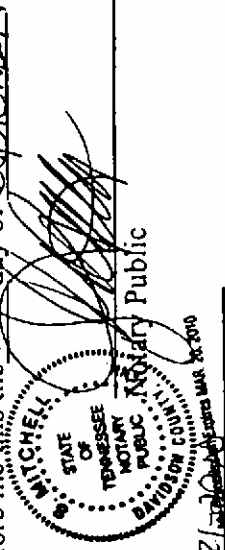
519 Snyder Ave
Street Address

5700 Maxon Ave
Street Address

Nash TN 37209
City, State and Zip Code

Nash TN 37209
City, State and Zip Code

Sworn to and subscribed before me this the 27th day of September, 2009.



My Commission Expires: 3-27-2010

THIS DOCUMENT WAS PREPARED BY:

Mr. Patrick Johnson, Esq.
BPRN 7339
Johnson, Scruggs & Barfield
95 White Bridge Road
Suite 508, Cavalier Building
Nashville, Tennessee 37205
615-352-8326

IN THE CHANCERY COURT FOR DAVIDSON COUNTY, TENNESSEE

THE METROPOLITAN GOVERNMENT OF
NASHVILLE AND DAVIDSON COUNTY IN
ITS OWN CAPACITY AND FOR THE USE
AND BENEFIT OF THE STATE OF TENNESSEE,

Plaintiff,

v.

Davidson County	ROS
Recvd: 01/12/15 11:41	4 PGS
Fees: 23.00 Taxes: 19.05	
20150112-0003053	

REAL PROPERTY

Tax Civil Action
No. 12-368-I

DELINQUENT TAXPAYERS AS SHOWN ON
THE 2010 REAL PROPERTY TAX RECORDS
OF THE METROPOLITAN GOVERNMENT OF
NASHVILLE AND DAVIDSON COUNTY,
TENNESSEE

BOTTOMS, HOWARD ET AL

Bill No: 166142

Map & Parcel No: 13301026200

DECREE FOR REDEMPTION

It appearing to this Honorable Court that **BOTTOMS, HOWARD ET AL** by and through
CHARLES WALKER, ATTORNEY, has exercised the right of redemption in accordance with
Tenn. Code Ann. § 67-5-2701 and paid into the Court the amount required in order to redeem the property
described as:

3503 MAYS ST NASHVILLE 37211
Map & Parcel No: 13301026200

1. That all the right, title and interest of the purchaser(s), **TERRELL STARKS**, and
said parcel of land be divested out of **TERRELL STARKS** and be vested into **BOTTOMS,
HOWARD & BOTTOMS, LANI JADE**.

2. That, upon request, the Clerk and Master will provide a certified copy of this
decree for recording with the Register of Deeds.

The costs of the certified decree will be paid by Defendant and upon application, a writ of
possession will issue to put the Defendant in possession of said parcel of land at Defendant's
cost.

3. That the purchaser(s) be refunded the purchase amount, interest as called for by
law, and all other lawful charges.

THE AMOUNT PAID TO REDEEM
THIS PROPERTY IS \$ 3068.48

Patricia Nelson
DEPUTY CLERK & MASTER

RECEIVED

DEC 12 2014

Davidson County Court

2014 DEC 18 AM 10:30

FILED

LAND MASTER
DAVIDSON COUNTY CHANCERY COURT

DO NOT
RECORD

Charles Boy
CHANCELLOR

Approved for Entry:

THE DEPARTMENT OF LAW OF THE METROPOLITAN
GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY
SAUL SOLOMON, #11689, DIRECTOR OF LAW

Jason P. Bobo
J. Brooks Fox, # 16096
Margaret O. Darby, #20701
Jason P. Bobo, #29756
Assistant Metropolitan Attorneys
Metropolitan Courthouse, Suite 108
P. O. Box 196300
Nashville, TN 37219
(615) 862-6343
Attorneys for Plaintiff

I HEREBY CERTIFY THAT THIS IS A TRUE COPY
OF ORIGINAL INSTRUMENT FILED IN MY OFFICE.

THIS 7th DAY OF January, 2015
CRISTI SCOTT, CLERK & MASTER

BY Jason P. Bobo DEPUTY

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Decree for Redemption were forwarded by U.S. Mail
to the following this 12th day of December, 2014.

Name + Address of New Owner + Tax Bills:
* BOTTOMS, HOWARD *
* 3503 MAYS MAYS ST. *
NASHVILLE, TN 37211

TERRELL STARKS
526 BAYPOINT DR
GALLATIN, TN 37066

CHARLES WALKER, ATTORNEY
69 THOMPSON LANE
NASHVILLE, TN 37211

METRO MAIL
Metropolitan Assessor
Metropolitan Trustee

Jason P. Bobo
JASON P. BOBO

CHANCERY COURT
DAVIDSON COUNTY
OFFICE OF CLERK AND MASTER
NASHVILLE, TENNESSEE

METROPOLITAN GOVERNMENT, ETC
12-368-J VS. 13301026200 166142
DELINQUENT TAXPAYERS ETC.
(HOWARD B BOTTOMS ET AL)

TO: TERRELL STARKS
526 BAYPOINT DR
GALLATIN, TN 37066

DC&M

CLERK AND MASTER
DAVIDSON CO. CHANCERY CT.

2014 AUG 21 PM 3:51

FILED

NOTICE OF REDEMPTION PROCESS

YOU ARE HEREBY NOTIFIED THAT ON 8/21/2014, FUNDS WERE TENDERED TO REDEEM THE PROPERTY SOLD IN THIS CAUSE. You have 30 days from the date of the tender to file the attached claim requesting additional amounts to be paid to compensate you for any lawful charges or monies you have expended to preserve the value of the property. If you protest the redemption on other grounds, you must explain your objection in papers filed with the Clerk and Master pursuant to the Tennessee Rules of Civil Procedure.

CRISTI SCOTT, CLERK & MASTER

BY

Clair D. Porter

Deputy Clerk and Master

DATE

8/21/14

Payer of Funds to Redeem:

CHARLES WALKER, ATTORNEY FOR HOWARD B BOTTOMS
69 THOMPSON LANE
NASHVILLE, TN 37211

Purchase Price:	\$5,500.00
Date Purchase Paid:	6/25/2013
Redemption Date:	8/21/2014
Redemption Amount Paid:	\$3,093.48
Interest to Date:	\$638.73

2014 DEC -4 AM 8:45
METRO DEPT. OF LAW

OATH OF CONSIDERATION:

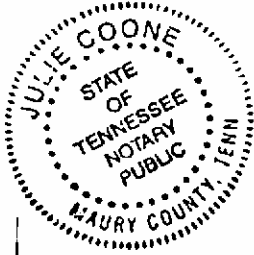
The actual consideration for this transfer is \$5,149.89

[Signature]
Affiant

SS
State of Tennessee
County of Davidson

Sworn to and subscribed before me this 17th day of January, 2015.

[Signature]
Notary Public
My comm exp: 5-24-17



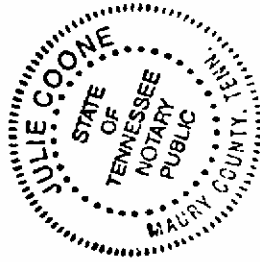
CERTIFICATE OF AUTHENTICITY

I, Charles Walker, do hereby make oath that I am a licensed attorney and/or the custodian of the electronic version of the attached document tendered for registration herewith and that this is a true and correct copy of the original document executed and authenticated according to law.

State of Tennessee
County of Davidson

[Signature]
CHARLES WALKER

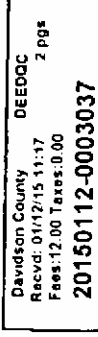
Personally appeared before me, Julie Coone, a notary public for this county and state, Charles Walker, who acknowledges that this certification of an electronic document is true and correct and whose signature I have witnessed.



[Signature]
JULIE COONE, NOTARY PUBLIC
My commission expires: May 24, 2017

Address of New Owner:
Howard B. Bottoms
420 Welshwood Drive Apt 5
Nashville, TN 37211

Send Tax Bills To:
Owner
Map & Parcel:
13301026200



Prepared By:
Howard B. Bottoms

THIS TRANSFER IS EXEMPT FROM TRANSFER TAX T.C.A. § 67-4-409(a)(3)(D)

QUITCLAIM DEED

I, David Bottoms, Executor of the Estate of Vernon Irene Bottoms, by letters testamentary in Case No. 10P1375, Davidson County Probate Court, and as Guardian for Lani Jade Bottoms, for and in consideration of (\$10) dollars the receipt of which is hereby acknowledged, and to settle any and all controversies regarding the disposition of the property of the Estate of Vernon Irene Bottoms, and confirm the vesting of title in **Howard B. Bottoms**, do hereby quitclaim to **Howard B. Bottoms**, an unmarried man, his Heirs and Assigns, all rights, title and interest in the following land located in Davidson County, Tennessee described as follows: To-Wit:

Being Lot No. 448 on the Final Plat Resubdivision of Lots 448 & 449 Sunrise Heights Second Plan of record in Instrument No. 20070206-0015587, Davidson County Register of Deeds, to which plan reference is made for a more complete and accurate description.

Being the same property devised to Howard B. Bottoms by Affidavit of Heirship recorded in Instrument No. 20100729-0059354, Davidson County Register of Deeds.

This is unimproved property known as 3103 Mays Street, Nashville, Tennessee, 37211.

Witness my hand this the 5th day of October, 2010.

David Bottoms

David Bottoms Executor of the Vernon Irene Bottoms Estate and as Guardian for Lani Jade Bottoms

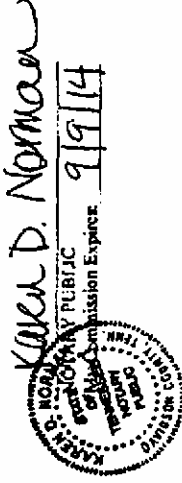
FILED
JUN 30 AM 11:19

CLERK AND MASTER
NEW CO. CHANCERY CT.

STATE OF TENNESSEE)
COUNTY OF DAVIDSON) ss.

Before me, the undersigned authority, a Notary Public in and for said County and State, personally appeared DAVID BOTTOMS, with whom I am personally acquainted or proven to me on the basis of satisfactory evidence, and who acknowledged that he executed the foregoing instrument for the purposes therein contained.

SWORN TO AND SUBSCRIBED this 5th day of October, 2010.



CERTIFICATE OF AUTHENTICITY

I, Charles Walker, do hereby make oath that I am a licensed attorney and/or the custodian of the electronic version of the attached document tendered for registration herewith and that this is a true and correct copy of the original document executed and authenticated according to law.


CHARLES WALKER

State of Tennessee
County of Davidson

Personally appeared before me, Julie Coone, a notary public for this county and state, Charles Walker, who acknowledges that this certification of an electronic document is true and correct and whose signature I have witnessed.


JULIE COONE, NOTARY PUBLIC
My commission expires: May 24, 2017



Davidson County DEEDWARR
Rec'd: 01/12/15 13:54 3 PGS
Fees: 18.00 Taxes: 55.50
20150112-0003158

ADDRESS OF NEW OWNER(S) REO Holdings, LLC 1217 W. 2 nd Street Owensboro, KY 42301	SEND TAX BILLS TO: Same	MAP-PARCEL NUMBER(S) 13301026200
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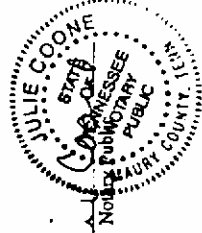
OATH OF CONSIDERATION:

SS.
STATE OF TENNESSEE
COUNTY OF DAVIDSON

The actual consideration or true value, whichever is greater for this transfer is \$15,000.00.


Affiant

Sworn to and Subscribed before me this 27th day of March, 2014.



My Commission Expires: 5-24-17

WARRANTY DEED

FOR AND IN CONSIDERATION OF ten dollars (\$10) and other good and valuable consideration, the receipt and legal sufficiency of all of which are hereby acknowledged, **Howard B. Bottoms, an unmarried man, (hereinafter called the "Grantor")**, has this day bargained and sold, transferred and conveyed and by these presents does bargain, sell, transfer and convey unto **REO Holdings, LLC, a Tennessee Limited Liability Company, (hereinafter called "Grantee")**, a certain tract or parcel of land in Davidson County, State of Tennessee, described as follows, to-wit:

Being Lot No. 448 on the Final Plat Resubdivision of Lots 448 & 449 Sunrise Heights Second Plan of record in Instrument No. 20070206-0015587, Davidson County Register of Deeds, to which plan reference is made for a more complete and accurate description.

Source of Grantor's title is an Affidavit of Heirship executed by Raymond Rowe recorded in Instrument No. 20100729-0059354, Register's Office for Davidson County, Tennessee.

The above-described property is unimproved property known as 3103 Mays Street, Nashville, Tennessee, 37211.

THIS CONVEYANCE IS SUBJECT TO:

- Current and prior year's property taxes which have been assumed by the Grantee;
- All restrictions, easements and matters appearing on the plan of record in Book 421, Page 46, and Instrument No. 20070206-0015587, Register's Office for Davidson County, Tennessee;
- All applicable government and zoning regulations;

TO HAVE AND TO HOLD, upon the entry of a Decree for Redemption by the Davidson County Chancery Court redeeming the above described property from the delinquent tax sale in Tax Civil Action No. 12-368-1, or, if a Decree for Redemption is not entered by February 1, 2015, then title shall vest on February 1, 2015, in the aforesaid real estate, together with all appurtenances and hereditaments thereto appertaining unto Grantee, its successors and assigns in fee simple forever.

FILED
2015 JUN 30 AM 11:19
JAN. MASTER
DAVIDSON COUNTY CHANCERY CT.

DC&M

Grantor covenants that Grantor is lawfully seized and possessed of said real estate, has full power and lawful authority to sell and convey the same; that the title thereto is free, clear and unencumbered except as aforesaid; and, Grantor will forever warrant and defend the same against the lawful claims of all persons whomsoever.

The words "Grantor" and "Grantee" shall include their respective successors and assigns where the context requires or permits.

IN WITNESS WHEREOF, the Grantor has caused this instrument to be executed on this 27th day of March, 2014.

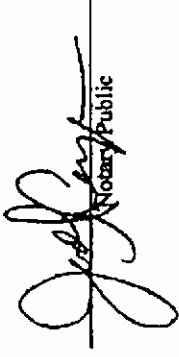
GRANTOR:


Howard B. Bottoms

SS.
STATE OF TENNESSEE
COUNTY OF DAVIDSON

On this the 27 day of March, 20 14, before me personally appeared Howard B. Bottoms, to me known to be the person, (or persons) described in and who executed the foregoing instrument, and acknowledged that he/she/they executed the same as his/hcr/their free act and deed.

My commission expires: 8-23-16


Notary Public



CERTIFICATE OF AUTHENTICITY

I, Charles Walker, do hereby make oath that I am a licensed attorney and/or the custodian of the electronic version of the attached document tendered for registration herewith and that this is a true and correct copy of the original document executed and authenticated according to law.


CHARLES WALKER

State of Tennessee
County of Davidson

Personally appeared before me, Julie Coone, a notary public for this county and state, Charles Walker, who acknowledges that this certification of an electronic document is true and correct and whose signature I have witnessed.


JULIE COONE, NOTARY PUBLIC
My commission expires: May 24, 2017







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LAST WILL AND TESTAMENT

I, MANUEL E. MARTIN, JR., a resident of Calaveras County, California, of lawful age and of sound and disposing mind and memory, and not acting under duress, menace, fraud or undue influence of any person whomsoever, do make, publish and declare this to be my Last Will and Testament, in the manner following, that is to say:

FIRST: I direct my Executor to pay all my just debts and the expenses of my last illness, funeral and burial as soon after my demise as can lawfully and conveniently be done.

SECOND: I declare that I am married and that the name of my wife is LOTTIE E. MARTIN, and that we have no children the issue of this marriage, but I have a child by a previous marriage, namely, CLARICE ANN GOMES, a daughter.

THIRD: I give, devise and bequeath to my wife, LOTTIE E. MARTIN, all property of every kind or character and wheresoever situated, owned or possessed by me, or in which I may have any interest at the time of my death.

In the event that my said wife, LOTTIE E. MARTIN, should predecease me, then, and in that event, I give, devise and bequeath all property of every kind or character and wheresoever situated, owned or possessed by me, or in which I may have any interest at the time of my death to RAYMOND MOSS, whose address is 17208 East 51st Street, Independence, Missouri 64051.

FOURTH: I have intentionally made no provision in this Will for any inheritance to my daughter, CLARICE ANN GOMES, or to my step-son, WILLIAM GOMES, the child of my deceased wife, TILLIE MARTIN, by a prior marriage.

FIFTH: I hereby authorize my Executor, hereinafter named, to sell the whole or any part of my estate at either public or private sale, with or without notice, but subject to such

1 confirmation as may be required by law.

2 SIXTH: I direct that my Executor, hereinafter named,
3 shall have full power and authority to settle, collect and
4 compromise all claims and demands belonging to my estate, to
5 accept any security for any debt, to allow such time for payment
6 as shall seem proper, and to settle, adjust, compromise, pay or
7 discharge any claim which may be made against or in favor of my
8 estate upon such terms and conditions and in such manner as may
9 to such Executor, in his discretion, seem advisable.

10 SEVENTH: I hereby nominate, constitute and appoint my
11 wife, LOTTIE E. MARTIN, as Executor of this, my Last Will and
12 Testament, and so far as I have the power, I order and direct that
13 she may qualify and act as such Executor without giving any bond
14 or other security.

15 In the event that my said wife, LOTTIE E. MARTIN,
16 should be unwilling or unable to act as such Executor, then I
17 hereby nominate, constitute and appoint RAYMOND MOSS as Executor
18 of this, my Last Will and Testament, and so far as I have the
19 power, I order and direct that he may qualify and act as such
20 Executor without giving any bond or other security.

21 EIGHTH: I hereby revoke all other and former Wills and
22 Codicils by me heretofore made.

23 IN WITNESS WHEREOF, I have hereunto set my hand this
24 14th day of August, 1985, at San Andreas, California.

25
26 Manuel E. Martin, Jr.
27 MANUEL E. MARTIN, JR.

1 The foregoing instrument, consisting of three (3) pages,
2 including this page, was, on the date thereof, to wit, the 12/14
3 day of August, 1985, signed by MANUEL E. MARTIN, JR., in our
4 presence after his Will, this instrument, had been read to him in
5 the presence of each of us, and at the time of his subscribing
6 said instrument he declared this to be an instrument expressing
7 his desires and he declared this said instrument to be his Last
8 Will and Testament, in the presence of us, who, at his request
9 and in his presence and in the presence of each other, have signed
10 the same as subscribing witnesses thereto.

11 *F. D. [Signature]*

12
13
14 Residing at: *Manuel E. Martin, Jr.*

15
16
17 *[Signature]*

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19 Residing at: *[Signature]*

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AFFIDAVIT OF HEIRSHIP

OATH OF CONSIDERATION:
T.C.A. § 67-4-109(a)(3)(D) exempts this instrument from tax and T.C.A. § 67-4-109(a)(5) further provides the valuation oath is unnecessary, the affidavit being used to evidence transfer of title to the property to a beneficiary.

THIS INSTRUMENT PREPARED BY:

WALKER LAW OFFICES
69 THOMPSON LANE
NASHVILLE, TENNESSEE 37211
OFFICE (615) 461-3760

ADDRESS OF NEW OWNER(S):

Clarisa Gomez
c/o Walker Law Offices
69 Thompson Lane
Nashville, Tennessee 37211

SEND TAX BILLS TO:

Same

MAP-PARCEL NUMBER(S):

03-50-34.14

AFFIDAVIT OF HEIRSHIP

S.S.
STATE OF TENNESSEE
COUNTY OF DAVIDSON

COMES NOW my affiant, Clarisa Gomez, and after first being duly sworn does hereby depose and say:

My name is Clarisa Gomez and I am an adult citizen and resident of the State of Tennessee, having reached the age of majority. I, Clarisa Gomez, am also known as Clarisa Gomez.

I currently reside at 5353 Lane Ridge Rd. Nolichucky, TN 37623

I have personal knowledge of the matters set forth herein.

Manuel E. Martin Jr was a resident and citizen of Maury County, Tennessee, at the time of his death on October 18, 2013.

Mr. Manuel E. Martin Jr was widowed at the time of his death and had only one living relative, Clarisa Gomez, his daughter, that survived him. At the time of Mr. Manuel E. Martin Jr death he had no surviving parents or grandparents. Mr. Manuel E. Martin Jr had one non blood relative, a step-son named Raymond Moss. The only surviving heir of his children is Clarisa Gomez.

Mr. Manuel E. Martin Jr died without a will. Since there was no probate estate to administer, all known claims having been paid and no inheritance tax being due, this Affidavit is being filed in lieu of probate.

This Affidavit of Heirship is freely given pursuant to Section 30-2-712, et seq., of the Tennessee Code Annotated, based on the personal knowledge of the affiant, to help establish and reflect the heirship with respect to any real or personal property owned by Manuel E. Martin Jr in Maury County, Tennessee, or elsewhere, and particularly to confirm the vesting of title in fee simple to certain real property in Maury County, Tennessee, described as follows:

SITUATE in the Third (3rd) civil district of Maury County, Tennessee,
and more particularly described as all of Tract 3 of the Mark R. Ide

property, containing 1.01 acres, as shown by a map of record in Plat Book 8 at page 194 in the Maury County, Tennessee Register of Deeds office.

BEING the same property conveyed to Manuel Martin, and wife Lottie Martin by instrument dated March 25, 1993 of record in Book 1176 at page 398 in the Maury County, Tennessee Register of Deeds Office. Further, Lottie Martin predeceased Manuel Martin and her interest was passed to him by operation of law. Manuel Martin is also known as Manuel E. Martin Jr.

This is improved property known as 3134 Greens Mill Rd, Spring Hill, TN.

This is to confirm the vesting of the above described property in Clarisa Gomez for simple absolute.

FURTHER AFFIANT SAYETH NAUGHT.

Clarisa Gomez
Clarisa Gomez

**S.S.
STATE OF TENNESSEE
COUNTY OF DAVIDSON**

Before me, a Notary Public, duly appointed, commissioned and qualified in and for the State and County aforesaid, personally appeared Clariza Gomez, the within named bargainer, with whom I am personally acquainted or proved to me on the basis of satisfactory evidence to be the person described in the foregoing, who signed, sealed and delivered the foregoing instrument in my presence, and who, upon oath, acknowledged that she executed the foregoing instrument for the purposes therein contained as her free act and deed.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal at my office in said County, on this 27 day of March, 2015.

Notary Public

My commission expires: 7-3-17



BK/PG:R2313/544-545

15003299

15003299	1 PERS AL - AFFILIATION 20 MAR 1972	0 30
	2000 MAR 19 1972	0 00
	03 13 1211 - 03 10 04	3 00
	VALUE	0 00
	WESTLIME FAX	0 00
	FRANKLIN FAX	0 00
	SECOND IN PZ	18 00
	OP FAX	2 00
	REGISTER 9 PZ	0 00
	TOTAL SHOOT	17 00

GRANTOR:

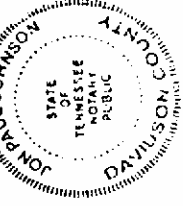
Clarisa Gomez
Clarisa Gomez

SS.
STATE OF TENNESSEE)
COUNTY OF DAVIDSON)

BEFORE ME, the undersigned Notary Public of the State and County aforementioned, personally appeared Clarisa Gomez, with whom I am personally acquainted, or proved to me on the basis of satisfactory evidence, and who, upon oath, acknowledged himself to be the within named bargainor, and that he executed the foregoing instrument for the purpose therein contained.

WITNESS my hand and seal, this 27 day of March, 2015.

Cheryl R. R. R.
Notary Public
My Comm. Exp.: 7-3-17





650

G-19327

IN CONSIDERATION of One (\$1.00) Dollar and other valuable considerations paid, the receipt of all of which is hereby acknowledged, I, ELGIN SMITH, Trustee, hereby declaring that I am not the sole beneficiary under my Trusteeship, do hereby sell, transfer and convey unto ROBERT D. BURNS, and wife, BETTY J. BURNS, the following described real estate located in the City of Chattanooga, Hamilton County, Tennessee:

Lot Eighteen (18), Block "B", Amended Map of Blocks "A" and "B", Brainerd Terrace Subdivision, as shown by plat of record in Plat Book 14, Page 136, in the Register's Office of Hamilton County, Tennessee. According to said plat, said lot is more particularly described as follows: BEGINNING on the Southern line of Los Lomas Drive one hundred forty-four and eight-tenths (144.8) feet Eastwardly as measured along the Southern line of Los Lomas Drive from its intersection with the Eastern line of Benham Drive if both are extended; thence Eastwardly along the Southern line of Los Lomas Drive seventy-five (75) feet to the Northwest corner of Lot Seventeen (17); thence Southwardly along the dividing line of Lots Seventeen (17) and Eighteen (18) one hundred forty-two and seven-tenths (142.7) feet to the Northeast corner of Lot Twenty-three (23); thence Westwardly along the dividing line of Lots Eighteen (18) and Twenty-three (23) one hundred five (105) feet to the Southeast corner of Lot Nineteen (19); thence Northwardly along the dividing line of Lots Eighteen (18) and Nineteen (19), one hundred twenty-nine and seven-tenths (129.7) feet to the point of beginning (according to plat, one hundred thirty and six-tenths (130.6) feet).

Being a part of the same property conveyed to Elgin Smith, Trustee, by deed of record in Book 1681, Page 310, in the said Register's Office.

SUBJECT to Sanitary Sewer Easement executed by Brainerd Hills Club, dated December 3, 1963 and filed for record September 14, 1965 in Book 1644, Page 224, in the said Register's Office.

SUBJECT to restrictions as set out in the instrument executed by Brainerd Hills Company, Inc., dated March 12, 1940 and filed for record March 28, 1940 in Book 793, Page 683, in the said Register's Office; and as modified by instrument executed by Brainerd Hills Club, Inc., et al, dated May 24, 1966 and filed for record May 26, 1966 in Book 1679, Page 312, in the said Register's Office.

SUBJECT to any governmental zoning and subdivision ordinances or regulations in effect thereon.

RECORDED
IN THE REGISTER'S OFFICE
OF HAMILTON COUNTY, TENN.
MAY 24 1968

By *Elgin Smith*
Elgin Smith
Trustee

THIS INSTRUMENT
WAS PREPARED BY
WOODS & BRILEY
ATTORNEYS AT LAW
110 PROVIDENT BLDG.
CHATTANOOGA, TENN.
37403

The grantees herein assure and agree to pay all taxes assessed against said real estate for the year 1968.

651

TO HAVE AND TO HOLD the same unto the said ROBERT D. BURNS and wife, BETTY

J. BURNS, their heirs and assigns, forever in fee simple

I covenant that I, as such Trustee, am lawfully seized and possessed of

said real estate; have full power and lawful authority to sell and convey the

same; that the title therein is clear, free and unencumbered, except as herein-

above mentioned; and I, as such Trustee, will forever warrant and defend the

same against all lawful claims

WITNESS my hand on this the 14th day of February 1968.

Elgin Smith Trustee
Elgin Smith, Trustee



STATE OF TENNESSEE
COUNTY OF HAMILTON

I, on this the 16th day of February 1968, before me personally appeared ELGIN SMITH, Trustee, to me known to be the person described in and who executed the foregoing instrument and acknowledged that he, as such Trustee executed the same as his free act and deed.

WITNESS my hand and Notarial Seal.

James H. Smith
Notary Public

My Commission Expires July 5, 1971

STATE OF TENNESSEE
COUNTY OF HAMILTON

I hereby swear or affirm that the actual consideration for this transfer or value of the property transferred, whichever is greater, is \$30,000.00, which amount is equal to or greater than the amount which the property transferred would command at a fair and volum-

Robert D. Burns, Jr.
Affiant

Subscribed and sworn to before me this 16th day of February 1968.

James H. Smith
Notary Public

My Commission Expires July 5, 1971

TAX \$4.00 REC \$4.00 TOTAL \$8.00



STATE OF TENNESSEE, HAMILTON COUNTY:
The above Instrument and Certificate were filed Feb. 21, 1968
2:59 PM entered in Note Book No. 61 Page 24 and
recorded in Record Book 1757 Page 650
WITNESS my hand at office in Chattanooga, Tennessee.

Donalby R. Gorman
Register

FILED

1968 JUN 30 AM 11:19

CLERK OF COURT MASTER
HAMILTON CO. CHANCERY CT.

DC&M

DocuPage **GI 10488 / 906**

Instrument 2015061000085

3 Page AFFIDAVIT Value of SC
Recorded by KML on 6/13/2015 at 10:58 AM

Data Processing Fee \$2.00
Map Recording Fee \$15.00
Other Fee \$2.00

TOTAL FEES \$19.00

State of Tennessee Hamilton County
Register of Deeds
Electronically Recorded by **PAM HURST**

AFFIDAVIT OF HEIRSHIP	OATH OF CONSIDERATION: T.C.A. § 67-4-409a(3)(D) exempts this instrument from tax and T.C.A. § 67-4-409a(3)(S) further provides the valuation oath is unnecessary, the affidavit being used to evidence transfer of title to the property to a beneficiary.
THIS INSTRUMENT PREPARED BY: WALKER LAW OFFICES 49 THOMPSON LANE NASHVILLE, TENNESSEE 37211 OFFICE (615) 463-3786	
ADDRESS OF NEW OWNER(S): Allen Booker, c/o Charles Walker, Attorney 49 Thompson Lane Nashville, Tennessee 37211	SEND TAX BILLS TO: Same MAP/PARCEL NUMBER(S): 1581 F 016

AFFIDAVIT OF HEIRSHIP

S.S.
STATE OF NEW JERSEY
COUNTY OF MIDDLESEX

COMES NOW my affiant, Allen Booker, and after first being duly sworn does hereby depose and

say:

My name is Allen Booker and I am an adult citizen and resident of the State of New Jersey, having reached the age of majority.

I currently reside at 102 Park Ave, Piscataway, NJ 08854

I have personal knowledge of the matters set forth herein.

I am the son of Betty J. Burns

Betty J. Burns was a resident and citizen of Hamilton County, Tennessee, at the time of her death on December 12, 2010

Betty J. Burns survived her spouse, Robert Burns. Robert Burns died on December 31, 2008, leaving Betty J. Burns, his wife, as the sole heir to his estate.

Betty J. Burns died without a will. Betty J. Burns daughter, Patricia A. McCaslin, filed a Petition for Intestate Administration, Hamilton County Chancery Court Probate File No. 13-P-270. Other heirs listed are: Patricia A. McCaslin, daughter, John R. Burns, son, Elizabeth June Burns, daughter, Allen Booker, son, and Larry Booker, son.

Allen Booker is an heir of Betty J. Burns.

FILED
JUN 30 AM 11:20

CLERK AND MASTER
COURT OF CHANCERY CT.

OC&M

This Affidavit of Heirship is freely given pursuant to Section 30-2-712, et seq., of the Tennessee Code Annotated, based on the personal knowledge of the affiant, to help establish and reflect the heirship with respect to any real or personal property owned by Betty J. Burns in Hamilton County, Tennessee, or elsewhere, and particularly to confirm the vesting of title in fee simple to certain real property in Hamilton County, Tennessee, described as follows:

BEING LOT EIGHTEEN (18), BLOCK "B", (AMENDED MAP OF BLOCKS "A" AND "B", BRAINERD TERRACE SUBDIVISION, AS SHOWN BY PLAT OF RECORD IN PLAT BOOK 14, PAGE 136 IN THE REGISTER'S OFFICE OF HAMILTON COUNTY, TENNESSEE.

ACCORDING TO SAID PLAT, SAID LOT IS MORE PARTICULARLY DESCRIBED AS FOLLOWS: BEGINNING ON THE SOUTHERN LINE OF LOS LOMAS DRIVE ONE HUNDRED FORTY-FOUR AND EIGHT-TENTHS (144.8) FEET EASTWARDLY AS MEASURED ALONG THE SOUTHERN LINE OF LOS LOMAS DRIVE FROM ITS INTERSECTION WITH THE EASTERN LINE OF BENHAM DRIVE IF BOTH ARE EXTENDED, THENCE EASTWARDLY ALONG THE SOUTHERN LINE OF LOS LOMAS DRIVE SEVENTY-FIVE (75) FEET TO THE NORTHWEST CORNER OF LOT SEVENTEEN (17); THENCE SOUTHWARDLY ALONG THE DIVIDING LINE OF LOTS SEVENTEEN (17) AND EIGHTEEN (18) ONE HUNDRED FORTY-TWO AND SEVEN TENTHS (142.7) FEET TO THE NORTHEAST CORNER OF LOT TWENTY-THREE (23); THENCE WESTWARDLY ALONG THE DIVIDING LINE OF LOTS EIGHTEEN (18) AND TWENTY-THREE (23) ONE HUNDRED FIVE (105) FEET TO THE SOUTHEAST CORNER OF LOT NINETEEN (19); THENCE NORTHWARDLY ALONG THE DIVIDING LINE OF LOTS EIGHTEEN (18) AND NINETEEN (19), ONE HUNDRED TWENTY-NINE AND SEVEN-TENTHS (129.7) FEET TO THE POINT OF BEGINNING (ACCORDING TO PLAT, ONE HUNDRED THIRTY AND SIX-TENTHS (130.6) FEET.

BEING THE SAME PROPERTY CONVEYED TO ROBERT D. BURNS & BETTY J. BURNS, BY DEED OF RECORD, DATED 02/16/1968, AND RECORDED ON 02/21/1968 IN THE REGISTER'S OFFICE OF HAMILTON COUNTY, STATE OF TENNESSEE, IN DEED BOOK 1757, PAGE 650.

This is improved property known as 544 Las Lomas Drive, Chattanooga, TN.

This is to confirm the vesting of Betty J. Burns' interest in the above described property into Allen Booker, Larry Booker, Patricia McCaslin, John Burns, and Elizabeth Burns fee simple absolute.

FURTHER AFFIANT SAYETH NAUGHT.

Allen Booker
Allen Booker

S.S.
STATE OF NEW JERSEY
COUNTY OF MIDDLESEX

Before me, a Notary Public, duly appointed, commissioned and qualified in and for the State and County aforesaid, personally appeared Allen Booker, the within named bargainer, with whom I am personally acquainted or proved to me on the basis of satisfactory evidence to be the person described in the foregoing, who signed, sealed and delivered the foregoing instrument in my presence and who, upon oath, acknowledged that he/she executed the foregoing instrument for the purposes therein contained as his/her free act and deed.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal, at my office in said County, on this 27th day of May, 2015.

Mary J. Sims A Notary Public of New Jersey

MARY J. SIMS
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Dec 21, 2016

True Copy Certification

I, Charles Walker, do hereby make oath that I am a licensed attorney and/or the custodian of the electronic version of the attached document tendered for registration herewith and that this is a true and correct copy of the original document executed and authenticated according to law.



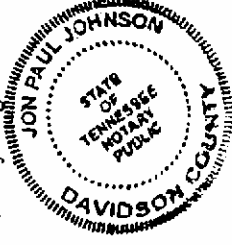
Signature

State of Tennessee
County of Davidson

Personally appeared before me, Jon Johnson, a notary public for this county and state, Charles Walker, who acknowledges that this certification of an electronic document is true and correct and whose signature I have witnessed.



Notary's Signature



My Commission Expires: 7/3/17

DEED

This Deed is made on

April

15th 19 92

BETWEEN

ALLEN BOOKER and EMMA L. BOOKER, his wife

whose address is 201 Park Avenue, Piscataway, New Jersey 08854

referred to as the Grantor,

AND MILAGROS BETANCOURT, unmarried

about to be residing at 201 Park Avenue, Piscataway, New Jersey 08854
whose first office address is

The words "Grantor" and "Grantee" shall mean all Grantors and all Grantees listed above
referred to as the Grantor.

Transfer of Ownership. The Grantor grants and conveys (transfers ownership of) the property
described below to the Grantee. This transfer is made for the sum of

Ninety Thousand and 00/100-----
The Grantor acknowledges receipt of this money,

Tax Map Reference. (N.J.S.A. 46:15-2) Municipality of Piscataway Township
Block No. 811
1 of No. 1
Account No.

☐ No property tax identification number is available on the date of this deed (check box if applicable)

Property. The property consists of the land and all the buildings and structures on the land in
the Township of Piscataway
County of Middlesex and State of New Jersey. The legal description is

BEING KNOWN AND DESIGNATED as Lots 1, 2, 3 and 4 in Block 42 as
shown on a certain map entitled, "Map of New Brunswick Highlands,
Section A, dated March 1920 and filed in the Office of the Clerk
of Middlesex County on December 26, 1922 as Map No. 1002 File 582.

BEGINNING at a point at the intersection of the Southorly sideline
of Park Avenue and the Easterly sideline of Fifth Street; thence

- (1) Along said sideline of Park Avenue, North 76 degrees 35 minutes
East, a distance of 100.00 feet to a point; thence
- (2) South 13 degrees 25 minutes East, a distance of 100.00 feet to
a point; thence
- (3) South 76 degrees 35 minutes West, a distance of 100.00 feet to
a point in the aforesaid Easterly sideline of Fifth Street; thence
- (4) Along said sideline of Fifth Street, North 13 degrees 25 minutes
West, a distance of 100.00 feet to the point and place of
BEGINNING.

Premises commonly known as 201 Park Avenue, Piscataway, NJ 08854.

SUBJECT to easements, restrictions and covenants of record, if any.

BEING the same premises conveyed to Allen Booker and Lizzie Bell
Booker, his wife, under Deed from Ann J. Spadafora and Fred Spadafora,
her husband, dated June 3, 1963 and recorded June 5, 1963 in Deed
Book 2412 Page 571. The said Lizzie Bell Booker died August 27,
1970 leaving Allen Booker sole surviving tenant by the entirety.

BOOK 3974 PAGE 824

RECEIVED/RECORDED
MIDDLESEX COUNTY 04/24/92 12534
CONSIDERATION \$10,000.00 131
DEED REC. FEE \$72.00
INSTRUMENT DEED 4425
NAME JLB

\$15.00

BOOK 3974 PAGE 824

FILED

APR 30 AM 11:20
CLERK AND MASTER
MIDDLESEX CO. CLERKERY CT.

DC&M

Promises by Grantor. The Grantor promises that the Grantor has done no act to encumber the property. This promise is called a "covenant as to grantor's acts" (N.J.S.A. 46:4-6). This promise means that the Grantor has not allowed anyone else to obtain any legal rights which affect the property (such as by making a mortgage or allowing a judgment to be entered against the Grantor).

Signatures. The Grantor signs this Deed as of the date at the top of the first page.

Witnessed by:

Anthony J. Marra Jr.
ANTHONY J. MARRA JR.

Allen Booker (Seal)
ALLEN BOOKER
Emma L. Booker (Seal)
EMMA L. BOOKER

STATE OF NEW JERSEY, COUNTY OF MIDDLESEX SS.

I CERTIFY that on April 15th 1992

Allen Booker and Emma L. Booker, his wife personally came before me and acknowledged under oath, to my satisfaction, that (his person (or if more than one, each person)

- (a) is named in and personally signed this Deed;
- (b) signed, sealed and delivered this Deed as his or her act and deed; and
- (c) made this Deed for \$ 90,000.00 as the full and actual consideration paid or to be paid for the transfer of title. (Such consideration is defined in N.J.A. 48:15.3)

Anthony J. Marra Jr.
ANTHONY J. MARRA JR.
ATTORNEY AT LAW OF NEW JERSEY

DEED

RETURNED

ALLEN BOOKER AND EMMA L. BOOKER,
his wife

Dated April 15th 19 92

Record and return to:

GARCES, GRABLER & CRAYSON, ESQS.
415 Watchung Avenue
Plainfield, NJ 07060

TO

Grantee

MILAGROS BETANCOURT, unmarried

Grantee

BOOK 3974 PAGE 826

END OF DOCUMENT

QUITCLAIM DEED GI 10489 / 155 Book/Page 2015061000124 3 Page QUITCLAIM DEED Value of \$30000.00 Recorded by TLF on 6/10/2015 at 2:42 PM		OATH OF CONSIDERATION: SS STATE OF TENNESSEE COUNTY OF HAMILTON THE ACTUAL CONSIDERATION OR FAIR MARKET VALUE WHEREBY IS GREATER FOR THIS TRANSFER IS \$ 30,000.00	
Conveyance Tax \$11.00 Deed Recording Fee \$15.00 Data Processing Fee \$2.00 Probate Fee \$1.00 Office Fee \$2.00 TOTAL FEES \$131.00 State of Tennessee Hamilton County Register of Deeds Electronic Recorded to Smoke PAM HURST		SWORN TO AND SUBSCRIBED BEFORE ME, JUDITH COONE, Notary Public in and for the State of Tennessee, on this 22nd day of May, 2015. AFFDANT MY COMMISSION EXPIRES 5-28-2017	
THIS INSTRUMENT PREPARED BY: WALKER LAW OFFICES 69 THOMPSON LANE NASHVILLE, TENNESSEE 37211 OFFICE (615) 463-3760		MAP-PARCEL NUMBER(S): 1381 F 016	
ADDRESS OF NEW OWNER(S): REO Holdings, LLC c/o Charles Walker, Attorney 69 Thompson Lane Nashville, TN 37211		SEND TAX BILLS TO: Same	

QUITCLAIM DEED

THIS INSTRUMENT, made and entered into this 22nd day of May, 2015, by and between Allen Booker, a single person, ("Grantor") and REO Holdings, LLC, a Tennessee Limited Liability Company ("Grantee");

WITNESSETH:

FOR AND IN CONSIDERATION of the sum of ten dollars (\$10) and other good and valuable consideration, the receipt and legal sufficiency of which are hereby acknowledged, Grantor does hereby convey, transfer, remise, release, relinquish and quitclaim unto Grantee, Grantee's heirs and assigns, all of Grantor's right, title and interest, specifically including his statutory right of redemption arising from the tax sale confirmed by Decree of the Hamilton County Chancery Court, in and to the following described real estate in Hamilton County, State of Tennessee, to-wit:

IN THE CITY OF CHATTANOOGA, HAMILTON COUNTY, TENNESSEE:

BEING LOT EIGHTEEN (18), BLOCK "B" (AMENDED MAP OF BLOCKS "A" AND "B", BRAINERD TERRACE SUBDIVISION, AS SHOWN BY PLAT OF RECORD IN PLAT BOOK 14, PAGE 136 IN THE REGISTER'S OFFICE OF HAMILTON COUNTY, TENNESSEE.

ACCORDING TO SAID PLAT, SAID LOT IS MORE PARTICULARLY DESCRIBED AS FOLLOWS: BEGINNING ON THE SOUTHERN LINE OF LOS LOMAS DRIVE ONE HUNDRED FORTY-FOUR AND EIGHT TENTHS (144.8) FEET EASTWARDLY AS MEASURED ALONG THE SOUTHERN LINE OF LOS LOMAS DRIVE FROM ITS INTERSECTION WITH THE EASTERN LINE OF BENHAM DRIVE IF BOTH ARE EXTENDED; THENCE EASTWARDLY ALONG THE SOUTHERN LINE OF LOS

¹ HAMILTON COUNTY, AND PUB OF THE STATE OF TENNESSEE, ET AL VERSUS TAX YEAR 2010 DELINQUENT TAXPAYERS, CHANCERY COURT, REAL ESTATE SALE, CONSOLIDATED TAX CAUSE, COUNTY DOCKET # 01210, Item # 1307, sales date, June 5, 2014, ORDER dated, June 16, 2011

FILED
 JUN 30 AM 11:20
 CLERK AND MASTER
 HAMILTON CHANCERY CT.
 DC&M

LOMAS DRIVE SEVENTY-FIVE (75) FEET TO THE NORTHWEST CORNER OF LOT SEVENTEEN (17); THENCE SOUTHWARDLY ALONG THE DIVIDING LINE OF LOTS SEVENTEEN (17) AND EIGHTEEN (18) ONE HUNDRED FORTY-TWO AND SEVEN TENTHS (142.7) FEET TO THE NORTHEAST CORNER OF LOT TWENTY-THREE (23); THENCE WESTWARDLY ALONG THE DIVIDING LINE OF LOTS EIGHTEEN (18) AND TWENTY-THREE (23) ONE HUNDRED FIVE (105) FEET TO THE SOUTHEAST CORNER OF LOT NINETEEN (19); THENCE NORTHWARDLY ALONG THE DIVIDING LINE OF LOTS EIGHTEEN (18) AND NINETEEN (19), ONE HUNDRED TWENTY-NINE AND SEVEN-TENTHS (129.7) FEET TO THE POINT OF BEGINNING (ACCORDING TO PLAT, ONE HUNDRED THIRTY AND SIX-TENTHS (130.6) FEET.

SUBJECT TO AND TOGETHER WITH:

Sanitary Sewer Easement executed by Braintreed Hills Club dated December 2, 1963 and filed for record September 14, 1965 in Book 1644, Page 224, in the said Register's Office.

Restrictions as set out in the instrument executed by Braintreed Hills Company, Inc., dated March 12, 1940 and filed for record March 28, 1940 in Book 793, Page 683, in the said Register's Office; and as modified by instrument executed by Braintreed Hills Club, Inc., et al, dated May 24, 1966 and filed for record May 26, 1966 in Book 1679, Page 312, in the said Register's Office. But omitting any covenant or restriction based on race, color, religion, sex, handicap, familial status or national origin unless and only to the extent that said covenant (a) is exempt under Chapter 42, Section 3607, of the United States Code or (b) relates to handicap but does not discriminate against handicapped persons.

Any governmental zoning and subdivision ordinances in effect thereon.

Being the same property devised to Allen Booker by Affidavit of Heirship recorded in Instrument # Book 1644, Page 706, Register's Office of Hamilton County, Tennessee; Further, being the same property conveyed to Robert D. Burns, and wife, Betty J. Burns by Deed dated February 16, 1964, and recorded on February 21, 1964, in Book 1757 Page 650, Register's Office for Hamilton County, Tennessee; said Betty J. Burns, having husband Robert D. Burns, predeceased her, deceased on December 12, 2012, her interest passed to her surviving children by operation of law.

The above-described property is improved property known as: 544 Las Lomas Dr, Chattanooga, Tennessee.

IN WITNESS WHEREOF, Grantor has caused this instrument to be executed on the date first above written.

GRANTOR:

Allen Booker

SS.
STATE OF NEW JERSEY)
COUNTY OF MIDDLESEX)

BEFORE ME, the undersigned Notary Public of the State and County aforementioned, personally appeared Allen Booker, with whom I am personally acquainted, or proved to me on the basis of satisfactory evidence, and who, upon oath, acknowledged himself to be the within named bargainer, and that he executed the foregoing instrument for the purpose therein contained.

WITNESS my hand and seal, this 27th day of May, 2015.

A Notary Public of New Jersey

MARY J. SIMS
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Dec. 31, 2018

True Copy Certification

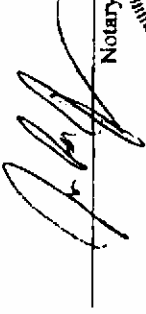
I, Charles Walker, do hereby make oath that I am a licensed attorney and/or the custodian of the electronic version of the attached document tendered for registration herewith and that this is a true and correct copy of the original document executed and authenticated according to law.



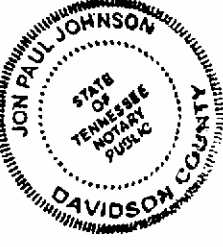
Signature

State of Tennessee
County of Davidson

Personally appeared before me, Jon Johnson, a notary public for this county and state, Charles Walker, who acknowledges that this certification of an electronic document is true and correct and whose signature I have witnessed.



Notary's Signature



My Commission Expires: 2/3/17

IN THE CHANCERY COURT OF HAMILTON COUNTY, TENNESSEE		STATEMENT OF PERSON REDEEMING PROPERTY		ACTION No. PART 1	11220
		SOLD AT TAX SALE T.C.A. § 67-5-2704.		CONSOLIDATED TAX ACTION	
STATE OF TENNESSEE F/B/O ☐ CITY OF CHATTANOOGA ☒ HAMILTON COUNTY, Plaintiffs		VS.		20 <u>10</u> DELINQUENT TAXPAYERS, DEFENDANTS	
PROPERTY TO BE REDEEMED					
ITEM #	MAP/GROUP/PARCEL	TAX SALE DATE	PURCHASER		
8307	158I F 016	6/05/2014	Billy Gregory		
NAME OF REDEEMING PERSON					
REO Holdings, LLC					
ADDRESS OF REDEEMING PERSON					
121 Poplar Street, Owensboro, KY 42301					
PHONE NO.					
800-875-7992					
PROPERTY TO BE REDEEMED					
DOCKET NO.	ITEM NO.	MAP NO.	TAX SALE DATE		
11220	8307	158I F 016	06/05/2014		
544 Las Lomas Dr, Hamilton County, TN Deed Book 1757, Page 650					
I VERIFY I AM ENTITLED TO REDEEM THIS PROPERTY FOR THE FOLLOWING REASON(S):					
☐ I am the delinquent taxpayer. ☐ I am making this redemption for the use and benefit of the delinquent taxpayer. OR (Check each applicable reason): [T.C.A. § 67-5-2701.] ☒ I own a legal interest in the property. Describe: REO Holdings, LLC has the right to redeem pursuant to State v. Delinquent Taxpayers 					
M2002-00718-COA-RS-CV and Marsh v. Stone 373 6 W. 3d 553. See attached proof recorded in Book 10438 Page 806, and Book 10488 Page 155, Hamilton County Register's Office.					
☒ I own an equitable interest in the property. Describe: See above ☐ I have a lien on the property as a creditor of the taxpayer. Describe:					
DATE 06/12/2015 PRINTED NAME Charles Walker, Attorney for REO Holdings, LLC #021277 SIGNATURE 					

FILED
15 JUN 30 AM 11:20
HAMILTON COUNTY CLERK & MASTER

NOTICE OF REDEMPTION TO TAX SALE PURCHASER T.C.A. § 67-5-2704

FROM: ROBIN MILLER, CLERK & MASTER (423) 209-6600
 CHANCERY COURT OF HAMILTON COUNTY, COURTHOUSE STE 300, CHATTANOOGA, TN 37402

DATE: PURCHASER: **BILLY GREGORY**

TO: ADDRESS: **2433 LEANN CIRCLE**
 DOCKET:

RE: **11220 8307 1581-F-016 06/05/2015** REDEMPTION EXPIRATION DATE: * **06/16/2015**

TAKE NOTICE THAT:

Money to redeem this property was tendered 06/12/2015 in the amount of \$11,923.80

DATE OF TENDER AMOUNT TENDERED

You have thirty (30) days from the DATE OF TENDER to file **REDEMPTION PROTEST WAIVER, OR MOTIONS, FORM 271T**, (attached) whereby you may: ❶ waive protest of the redemption, which will allow your refund to be processed immediately; ❷ file a motion to protest the redemption; or ❸ file a motion requesting additional amounts, if any, to be paid to compensate you as purchaser for any other lawful charges or money, including but not limited to property taxes due or delinquent on the property, reasonable payments made for required maintenance and insurance, expended to preserve the value of the property ("LAWFUL CHARGES"). The Motion for Lawful Charges on Form 271T (attached) shall be supported by appropriate receipts and be duly sworn before a notary public. If the Court finds you have LAWFUL CHARGES, the Court will order the redeeming person to pay such additional LAWFUL CHARGES to the CLERK & MASTER. After any additional sums have been paid to the CLERK & MASTER, the Court will order the redemption properly made, and the CLERK & MASTER will disburse the money pursuant to the order. If the Court finds no LAWFUL CHARGES are owing in order to redeem, or upon expiration of the 30-day period for you to file the motion, (Form 271T attached) the court will order redemption properly made, and the CLERK & MASTER will disburse the purchase price, plus interest at a rate of 10% per annum computed from the date of the sale, and any other moneys so ordered by the court to the purchaser.

Judgment (Opening Bid)	L1	\$10,374.14
Annualized 10% interest on bid (Interest does not accrue after redemption)	L2	\$ 1,524.66
Current County Taxes Paid, if applicable	L3	0.00
Current City Taxes Paid, if applicable	L4	0.00
Recording fee, if applicable	L5	0.00
Redemption Fee	L6	25.00
Subtotal (Add L1 through L6)	L7	\$11,923.80
Overbid, if applicable	L8	\$4,625.86
Subtotal (Add L7 and L8)	L9	\$16,549.66
Redemption cost retained by Clerk & Master	L10	25.00
Total to be paid to Purchaser (L9 minus L10)	L11	\$16524.66

*The one year redemption period starts the day after the entry of the court order confirming the sale.

IN THE CHANCERY COURT
OF HAMILTON COUNTY,
TENNESSEE

STATE OF TENNESSEE F/B/O
CITY OF CHATTANOOGA
XX HAMILTON COUNTY, Plaintiffs

ITEM #

8307

MAP/GROUP/PARCEL
1581-F-016

VS. 2010 DELINQUENT TAXPAYERS, DEFENDANTS

REDEMPTION PROTEST WAIVER
OR MOTIONS

[T.C.A. § 67-5-2701, et seq.]

ACTION NO. 11220
PART 1

CONSOLIDATED TAX ACTION

PART ① WAIVER OF PROTEST

To waive both
Parts ② and ③
check here ☐ and
complete only this

PART ① →

I purchased this property at a delinquent tax sale. I understand the property has now been duly redeemed. I have no interest in contesting the redemption (PART A) or seeking other Lawful Charges (PART C). I want to have the amount due me paid to me pursuant to T.C.A. § 67-5-2703.

DATE

PURCHASER'S SIGNATURE

PART ② MOTION TO PROTEST REDEMPTION

Pursuant to T.C.A. § 67-5-2704, I protest the redemption and move the Court for an order setting aside the tendered redemption, and for grounds would show as follows:

To file a motion to
object only to the
redemption, check
here ☐ and
complete only this

PART ② →

DATE

PURCHASER'S SIGNATURE

PART ③ VERIFIED MOTION FOR LAWFUL CHARGES

I understand this property has now been duly redeemed, and I have no interest in contesting the redemption. In addition to the amount due me pursuant to T.C.A. § 67-5-2703, I move the Court pursuant to T.C.A. § 67-5-2704 for an order granting the following Lawful Charges to be paid to compensate me for other money expended to preserve the value of the property. I attach receipts in support of these listed expenses.

DATE

ITEM

AMOUNT

To waive PART ②,
but to file a motion
for Lawful Charges,
check here ☐ and
complete only this

PART ③ →

(Add extra pages as needed.) TOTAL LAWFUL CHARGES DUE

STATE OF _____ COUNTY OF _____

Purchaser makes oath this claim for Lawful Charges is a correct, just, and valid obligation of the redeeming party, that neither Purchaser nor any other person on behalf of Purchaser has received payment or security therefor, in whole or in part, except as is above credited or stated.

This _____ day of _____, 20____

Sworn to and subscribed before me this _____ day of _____, 20____

My commission expires: _____

Purchaser's Signature

NOTARY PUBLIC

DocuPage: **GI 10488 / 906**

Instrument: 2015061000085

3 Page AFFIDAVIT Value of \$0

Recorded by KAL on 6/10/2015 at 10:58 AM

Data Processing Fee \$2.00

Misc Recording Fee \$15.00

eFile Fee \$2.00

TOTAL FEES \$19.00

State of Tennessee Hamilton County
Register of Deeds
Electronically Recorded by Taretha
PAM HURST

AFFIDAVIT OF HEIRSHIP	OATH OF CONSIDERATION: T.C.A. § 67-4-409(a)(3)(D) exempts this instrument from tax and T.C.A. § 67-4-409(a)(5) further provides the valuation oath is unnecessary, the affidavit being used to evidence transfer of title to the property to a beneficiary.
THIS INSTRUMENT PREPARED BY: WALKER LAW OFFICES 69 THOMPSON LANE NASHVILLE, TENNESSEE 37211 OFFICE: (615) 463-3760	
ADDRESS OF NEW OWNER(S): Allen Booker c/o Charles Walker, Attorney 69 Thompson Lane Nashville, Tennessee 37211	SEND TAX BILLS TO: Same MAP-PARCEL NUMBER(S): 1501 F 016

AFFIDAVIT OF HEIRSHIP

S.S.
STATE OF NEW JERSEY
COUNTY OF MIDDLESEX

COMES NOW my affiant, Allen Booker, and after first being duly sworn does hereby depose and say:

My name is Allen Booker and I am an adult citizen and resident of the State of New Jersey, having reached the age of majority.

I currently reside at 102 Park Ave, Piscataway, NJ 08854.

I have personal knowledge of the matters set forth herein.

I am the son of Betty J. Burns.

Betty J. Burns was a resident and citizen of Hamilton County, Tennessee, at the time of her death on December 12, 2010.

Betty J. Burns survived her spouse, Robert Burns. Robert Burns died on December 31, 2008, leaving Betty J. Burns, his wife, as the sole heir to his estate.

Betty J. Burns died without a will. Betty J. Burns daughter, Patricia A. McCaslin, filed a Petition for Intestate Administration; Hamilton County Chancery Court Probate File No. 13-P-270. Other heirs listed are: Patricia A. McCaslin, daughter, John R. Burns, son, Elizabeth June Burns, daughter, Allen Booker, son, and Larry Booker, son.

Allen Booker is an heir of Betty J. Burns.

2015 JUN 12 AM 11:08

FILED
HAMILTON CO CLERK & MASTER

cc: [Signature]

This Affidavit of Heirship is freely given pursuant to Section 30-2-712, et seq., of the Tennessee Code Annotated, based on the personal knowledge of the affiant, to help establish and reflect the heirship with respect to any real or personal property owned by Betty J. Burns in Hamilton County, Tennessee, or elsewhere, and particularly to confirm the vesting of title in fee simple to certain real property in Hamilton County, Tennessee, described as follows:

BEING LOT EIGHTEEN (18), BLOCK "B", (AMENDED MAP OF BLOCKS "A" AND "B", BRAINERD TERRACE SUBDIVISION, AS SHOWN BY PLAT OF RECORD IN PLAT BOOK 14, PAGE 136 IN THE REGISTER'S OFFICE OF HAMILTON COUNTY, TENNESSEE.

ACCORDING TO SAID PLAT, SAID LOT IS MORE PARTICULARLY DESCRIBED AS FOLLOWS: BEGINNING ON THE SOUTHERN LINE OF LOS LOMAS DRIVE ONE HUNDRED FORTY-FOUR AND EIGHT-TENTHS (144.8) FEET EASTWARDLY AS MEASURED ALONG THE SOUTHERN LINE OF LOS LOMAS DRIVE FROM ITS INTERSECTION WITH THE EASTERN LINE OF BENHAM DRIVE IF BOTH ARE EXTENDED, THENCE EASTWARDLY ALONG THE SOUTHERN LINE OF LOS LOMAS DRIVE SEVENTY-FIVE (75) FEET TO THE NORTHWEST CORNER OF LOT SEVENTEEN (17); THENCE SOUTHWARDLY ALONG THE DIVIDING LINE OF LOTS SEVENTEEN (17) AND EIGHTEEN (18) ONE HUNDRED FORTY-TWO AND SEVEN TENTHS (142.7) FEET TO THE NORTHEAST CORNER OF LOT TWENTY-THREE (23); THENCE WESTWARDLY ALONG THE DIVIDING LINE OF LOTS EIGHTEEN (18) AND TWENTY-THREE (23) ONE HUNDRED FIVE (105) FEET TO THE SOUTHEAST CORNER OF LOT NINETEEN (19); THENCE NORTHWARDLY ALONG THE DIVIDING LINE OF LOTS EIGHTEEN (18) AND NINETEEN (19), ONE HUNDRED TWENTY-NINE AND SEVEN-TENTHS (129.7) FEET TO THE POINT OF BEGINNING (ACCORDING TO PLAT, ONE HUNDRED THIRTY AND SIX-TENTHS (130.6) FEET.

BEING THE SAME PROPERTY CONVEYED TO ROBERT D. BURNS & BETTY J. BURNS, BY DEED OF RECORD, DATED 02/16/1968, AND RECORDED ON 02/21/1968 IN THE REGISTER'S OFFICE OF HAMILTON COUNTY, STATE OF TENNESSEE, IN DEED BOOK 1757, PAGE 630.

This is improved property known as 544 Las Lomas Drive, Chattanooga, TN.

This is to confirm the vesting of Betty J. Burns' interest in the above described property into Allen Booker, Larry Booker, Patricia McCaslin, John Burns, and Elizabeth Burns fee simple absolute.

FURTHER AFFIANT SAYETH NAUGHT.


Allen Booker

S.S.
STATE OF NEW JERSEY
COUNTY OF MIDDLESEX

Before me, a Notary Public, duly appointed, commissioned and qualified in and for the State and County aforesaid, personally appeared Allen Booker, the within named bargainor, with whom I am personally acquainted or proved to me on the basis of satisfactory evidence to be the person described in the foregoing, who signed, sealed and delivered the foregoing instrument in my presence, and who, upon oath, acknowledged that he/she executed the foregoing instrument for the purposes therein contained as his/her free act and deed.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal at my office in said County, on this 27th day of May, 2015.


A Notary Public of New Jersey

MARY J. SIMS
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Dec. 21, 2016

QUITCLAIM DEED GI 10489 / 155 Book/Page: 2015061000124 Instrument: 3 Page QUITCLAIM DEED Value of \$30000.00 Recorded by TLF on 6/10/2015 at 2:42 PM Convenience Tax \$111.00 Data Recording Fee \$15.00 Data Processing Fee \$2.00 Preregister Fee \$1.00 eFile Fee \$2.00 TOTAL FEES \$131.00 State of Tennessee Hamilton County PAM HURST Register of Deeds Electronically Recorded by Signature		OATH OF CONSIDERATION: I, <u>REO HOLDINGS, LLC</u> COUNTY OF HAMILTON THE ACTUAL CONSIDERATION OR FAIR MARKET VALUE WHEREVER IS GREATER FOR THIS TRANSFER IS \$ <u>30,000.00</u> AFFIANT SWORN TO AND SUBSCRIBED BEFORE ME ON <u>27</u> DAY OF <u>May</u> , 2015. MY COMMISSION EXPIRES <u>05-28-2016</u> NOTARY PUBLIC HAMILTON COUNTY, TENNESSEE <u>[Signature]</u>
THIS INSTRUMENT PREPARED BY: WALKER LAW OFFICES 69 THOMPSON LANE NASHVILLE, TENNESSEE 37211 OFFICE: (615) 463-3760		MAP-PARCEL NUMBER(S): 15817 016
ADDRESS OF NEW OWNER(S): REO Holdings, LLC c/o Charles Walker, Attorney 69 Thompson Lane Nashville, TN 37211	SEND TAX BILLS TO: Same	

QUITCLAIM DEED

THIS INSTRUMENT, made and entered into this 27th day of May, 2015, by and between Allen Booker, a single person, ("Grantor") and REO Holdings, LLC, a Tennessee Limited Liability Company ("Grantee");

WITNESSETH:

FOR AND IN CONSIDERATION of the sum of ten dollars (\$10) and other good and valuable consideration, the receipt and legal sufficiency of which are hereby acknowledged, Grantor does hereby convey, transfer, remise, release, relinquish and quitclaim unto Grantee, Grantee's heirs and assigns, all of Grantor's right, title and interest, specifically including his statutory right of redemption arising from the tax sale confirmed by Decree of the Hamilton County Chancery Court¹, in and to the following described real estate in Hamilton County, State of Tennessee, to-wit:

IN THE CITY OF CHATTANOOGA, HAMILTON COUNTY, TENNESSEE:

BEING LOT EIGHTEEN (18), BLOCK "B", (AMENDED MAP OF BLOCKS "A" AND "B", BRAINERD TERRACE SUBDIVISION, AS SHOWN BY PLAT OF RECORD IN PLAT BOOK 14, PAGE 136 IN THE REGISTER'S OFFICE OF HAMILTON COUNTY, TENNESSEE.

ACCORDING TO SAID PLAT, SAID LOT IS MORE PARTICULARLY DESCRIBED AS FOLLOWS:
 BEGINNING ON THE SOUTHERN LINE OF LOS LOMAS DRIVE ONE HUNDRED FORTY-FOUR AND EIGHT-TENTHS (144.8) FEET EASTWARDLY AS MEASURED ALONG THE SOUTHERN LINE OF LOS LOMAS DRIVE FROM ITS INTERSECTION WITH THE EASTERN LINE OF BENHAM DRIVE IF BOTH ARE EXTENDED; THENCE EASTWARDLY ALONG THE SOUTHERN LINE OF LOS

¹ HAMILTON COUNTY, AND FAUB OF THE STATE OF TENNESSEE, ET AL VERSUS TAX YEAR 2010 DELINQUENT TAXPAYERS, CHANCERY COURT, REAL ESTATE SALE, CONSOLIDATED TAX CAUSE, COUNTY DOCKET #11220, Item # 5307, sales date, June 5, 2014, ORDER dated, June 16, 2014.

2015 JUN 12 AM 11:09

FILED
HAMILTON CO CLERK & MASTER

cc: cc

LOMAS DRIVE SEVENTY-FIVE (75) FEET TO THE NORTHWEST CORNER OF LOT SEVENTEEN (17); THENCE SOUTHWARDLY ALONG THE DIVIDING LINE OF LOTS SEVENTEEN (17) AND EIGHTEEN (18) ONE HUNDRED FORTY-TWO AND SEVEN TENTHS (142.7) FEET TO THE NORTHEAST CORNER OF LOT TWENTY-THREE (23); THENCE WESTWARDLY ALONG THE DIVIDING LINE OF LOTS EIGHTEEN (18) AND TWENTY-THREE (23) ONE HUNDRED FIVE (105) FEET TO THE SOUTHEAST CORNER OF LOT NINETEEN (19); THENCE NORTHWARDLY ALONG THE DIVIDING LINE OF LOTS EIGHTEEN (18) AND NINETEEN (19) ONE HUNDRED TWENTY-NINE AND SEVEN-TENTHS (129.7) FEET TO THE POINT OF BEGINNING (ACCORDING TO PLAT, ONE HUNDRED THIRTY AND SIX-TENTHS (130.6) FEET.

SUBJECT TO AND TOGETHER WITH:

Sanitary Sewer Basement executed by Brainerd Hills Club dated December 2, 1963 and filed for record September 14, 1963 in Book 1644, Page 224, in the said Register's Office.

Restrictions as set out in the instrument executed by Brainerd Hills Company, Inc., dated March 12, 1940 and filed for record March 28, 1940 in Book 793, Page 683, in the said Register's Office; and as modified by instrument executed by Brainerd Hills Club, Inc., et al, dated May 24, 1966 and filed for record May 26, 1966 in Book 1679, Page 312, in the said Register's Office. But omitting any covenant or restriction based on race, color, religion, sex, handicap, familial status or national origin unless and only to the extent that said covenant (a) is exempt under Chapter 42, Section 3607, of the United States Code or (b) relates to handicap but does not discriminate against handicapped persons.

Any governmental zoning and subdivision ordinances in effect thereon.

Being the same property devised to Allen Booker by Affidavit of Heirship recorded in Instrument # Book 1648, Page 916, Register's Office of Hamilton County, Tennessee; Further, being the same property conveyed to Robert D. Burns, and wife, Betty J. Burns by Deed dated February 16, 1968, and recorded on February 21, 1968, in Book 1757 Page 650, Register's Office for Hamilton County, Tennessee; said Betty J. Burns, having husband Robert D. Burns, predeceased her, deceased on December 12, 2012, her interest passed to her surviving children by operation of law.

The above-described property is improved property known as: 544 Las Lomas Dr,
Chattanooga, Tennessee.

IN WITNESS WHEREOF, Grantor has caused this instrument to be executed on the date first above written.

GRANTOR:

Allen Booker
Allen Booker

SS.

STATE OF NEW JERSEY)
COUNTY OF MIDDLESEX)

BEFORE ME, the undersigned Notary Public of the State and County aforementioned, personally appeared Allen Booker, with whom I am personally acquainted, or proved to me on the basis of satisfactory evidence, and who, upon oath, acknowledged himself to be the within named bargainer, and that he executed the foregoing instrument for the purpose therein contained.

WITNESS my hand and seal, this 27th day of May, 2012
A Notary Public of New Jersey

Mary J. Sims

MARY J. SIMS
NOTARY PUBLIC OF NEW JERSEY

QUITCLAIM DEED GI 10491 / 479 Book/Page 2015081500103 3 Page QUITCLAIM DEED Value of \$20000.00 Recorded by TLF on 6/15/2015 at 9:52 AM Convenience Tax \$74.00 Deed Recording Fee \$15.00 Data Processing Fee \$2.00 Probate Fee \$1.00 Affile Fee \$2.00 TOTAL FEES \$94.00 State of Tennessee Hamilton County Register of Deeds Electronic Recorded by Sample		OATH OF CONSIDERATION: I, PAM HURST STATE OF TENNESSEE COUNTY OF DAVIDSON THE ACTUAL CONSIDERATION OR FAIR MARKET VALUE WHICH NEVER IS GREATER FOR THIS TRANSFER IS \$ <u>20,000.00</u> SWORN TO AND SUBSCRIBED TO BY PAM HURST DAY OF <u>JUNE</u> 20 <u>15</u> STATE OF <u>TENNESSEE</u> MY COMMISSION EXPIRES <u>2017</u>	
THIS INSTRUMENT PREPARED BY: WALKER LAW OFFICES 69 THOMPSON LANE NASHVILLE, TENNESSEE 37211 OFFICE: (615) 463-3760		MAP-PARCEL NUMBER(S): 120F B 021	
ADDRESS OF NEW OWNER(S): REO Holdings, LLC c/o Charles Walker, Attorney 69 Thompson Lane Nashville, Tennessee 37211		SEND TAX BILLS TO: Same	

QUITCLAIM DEED

THIS INSTRUMENT, made and entered into this 15 day of June, 2015, by and between Cara Woods, ("Grantor") and REO Holdings, LLC, a Tennessee Limited Liability Company ("Grantee");

WITNESSETH:

FOR AND IN CONSIDERATION of the sum of ten dollars (\$10) and other good and valuable consideration, the receipt and legal sufficiency of which are hereby acknowledged, Grantor does hereby convey, transfer, remise, release, relinquish and quitclaim unto Grantee, Grantee's heirs and assigns, all of Grantor's right, title and interest, specifically including his statutory right of redemption arising from the tax sale confirmed by Decree of the Hamilton County Chancery Court¹, in and to the following described real estate in Hamilton County, State of Tennessee, to-wit:

IN THE SECOND CIVIL DISTRICT, HAMILTON COUNTY, TENNESSEE:

Lot Thirty-five (35), Logan Heights, a subdivision, as shown by plat of record in Plat Book 15, page 74, Register's Office, Hamilton County, Tennessee. According to said plat, said lot fronts fifty (50) feet on the western line of Rotary Drive and extends westwardly between parallel lines one hundred fifty (150) feet to the western line of said subdivision.

SUBJECT TO AND TOGETHER WITH:

Any governmental zoning and subdivision ordinances in effect thereon.
 All notes, stipulations, restrictions, easements, conditions, and regulations as set out on recorded plat.

¹ HAMILTON COUNTY, AND FAULT OF THE STATE OF TENNESSEE, ET AL VERSUS TAX YEAR 2010 DELINQUENT TAXPAYERS, CHANCERY COURT, REAL ESTATE SALE, CONSOLIDATED TAX CAUSE, COUNTY DOCKET #11220, Item # 1763, sales date, June 5, 2014, ORDER dated, June 16, 2014

FILED
 2015 JUN 30 AM 11:20
 CLERK AND MASTER
 HAMILTON CO. CHANCERY CT.
 DC&M

Being the same property conveyed to Cara Woods and wife, Emma Woods by Warranty Deed from Elmoa Woods and wife, Cora Woods, recorded on September 8, 1965, in instrument recorded at Book 1642, Page 471, Register's Office of Hamilton County, Tennessee.

The above-described property is improved property known as: 5270 Rotary Drive, Chattanooga, Tennessee.

IN WITNESS WHEREOF, Grantor has caused this instrument to be executed on the date first above written.

GRANTOR:

Cara Woods
Cara Woods

SS.

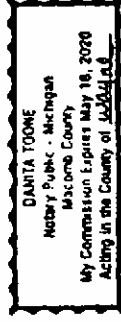
STATE OF Michigan)

COUNTY OF Wayne)

BEFORE ME, the undersigned Notary Public of the State and County aforementioned, personally appeared Cara Woods, with whom I am personally acquainted, or proved to me on the basis of satisfactory evidence, and who, upon oath, acknowledged himself to be the within named bargainor, and that he executed the foregoing instrument for the purpose therein contained.

WITNESS my hand and seal, this 2nd day of June, 2015.

Danita Toone
NOTARY PUBLIC
My Commission Expires: 5-18-2020



True Copy Certification

I, Charles Walker, do hereby make oath that I am a licensed attorney and/or the custodian of the electronic version of the attached document tendered for registration herewith and that this is a true and correct copy of the original document executed and authenticated according to law.



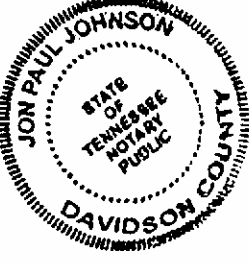
Signature

State of Tennessee
County of Davidson

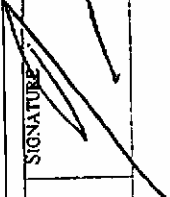
Personally appeared before me, Jon Johnson, a notary public for this county and state, Charles Walker, who acknowledges that this certification of an electronic document is true and correct and whose signature I have witnessed.



Notary's Signature



My Commission Expires: 7/3/17

IN THE CHANCERY COURT OF HAMILTON COUNTY, TENNESSEE		STATEMENT OF PERSON REDEEMING PROPERTY SOLD AT TAX SALE T.C.A. § 67-5-2701 et seq.		ACTION NO. PART I	CONSOLIDATED TAX ACTION
STATE OF TENNESSEE F/B/O ☐ CITY OF CHATTANOOGA ☒ HAMILTON COUNTY, Plaintiffs					
VS.					
20 <u>10</u> DELINQUENT TAXPAYERS, DEFENDANTS					
PROPERTY TO BE REDEEMED					
DOCKET NO.	ITEM NO.	MAP NO.	TAX SALE DATE		
11220	001763	120F B 021	6/5/2014		
NAME OF REDEEMING PERSON REO Holdings, LLC					
ADDRESS OF REDEEMING PERSON 121 Poplar St, Owensboro, KY 42301					
PHONE NO. 800-875-7992					
PROPERTY TO BE REDEEMED 5270 Rotary Dr					
I VERIFY I AM ENTITLED TO REDEEM THIS PROPERTY FOR THE FOLLOWING REASON(S):					
☐ I am the delinquent taxpayer.					
☒ I am making this redemption for the use and benefit of the delinquent taxpayer.					
OR (Check each applicable reason): [T.C.A. § 67-5-2701.]					
☒ I own a legal interest in the property. Describe: <u>REO Holdings, LLC has the right to redeem pursuant to State v. Delinquent Taxpayers M2002-00718-COA-R3-CV and March v. Storie 373 S.W.3d 553. See attached proof recorded in Book 141 Page 479. Register's Office</u>					
☐ I own an equitable interest in the property. Describe: <u>See above</u>					
☐ I have a lien on the property as a creditor of the taxpayer. Describe:					
DATE 6/15/2015					
PRINTED NAME Charles Walker, Attorney for REO Holdings, LLC # 021277 66 Thompson Lane, Nashville, Tennessee 37211			SIGNATURE 		

FILED
 JUN 15 2015
 AM 11:20
 CLERK OF COURT
 CHANCERY CT.
 DC&M

2015 JUN 15 AM 10:08

QUITCLAIM DEED GI 10491 / 479 Book/Page: 2015061500103 Instrument: 3 Page QUITCLAIM DEED Value of \$20000.00 Recorded by TLF on 6/15/2015 at 9:52 AM		OATH OF CONSIDERATION: SS. STATE OF TENNESSEE COUNTY OF DAVIDSON THE ACTUAL CONSIDERATION OR FAIR MARKET VALUE WHEREBY IS GREATER FOR THIS TRANSFER IS \$ <u>20,000.00</u>	
Conveyance Tax \$14.00 Deed Recording Fee \$15.00 Data Processing Fee \$2.00 Pragma Fee \$1.00 Title Fee \$2.00 TOTAL FEES \$34.00 State of Tennessee, Hamilton County Registrar of Deeds Electronic Recording by Sample		APPLICANT SWORN TO AND SUBSCRIBED FOR BY: <u>PAM HURST</u> DAY OF <u>JUNE</u> 2015 NOTARY PUBLIC MY COMMISSION EXPIRES: <u>12/31/17</u>	
THIS INSTRUMENT PREPARED BY: WALKER LAW OFFICES 69 THOMPSON LANE NASHVILLE, TENNESSEE 37211 OFFICE: (615) 463-3760			
ADDRESS OF NEW OWNER(S): REO Holdings, LLC c/o Charles Walker, Attorney 69 Thompson Lane Nashville, Tennessee 37211		SEND TAX BILLS TO: Same	MAP-PARCEL NUMBER(S): 120F B 011

QUITCLAIM DEED

THIS INSTRUMENT, made and entered into this 2 day of June, 2015, by and between Cara Woods, ("Grantor") and REO Holdings, LLC, a Tennessee Limited Liability Company ("Grantee");

WITNESSETH:

FOR AND IN CONSIDERATION of the sum of ten dollars (\$10) and other good and valuable consideration, the receipt and legal sufficiency of which are hereby acknowledged, Grantor does hereby convey, transfer, remise, release, relinquish and quitclaim unto Grantee, Grantor's heirs and assigns, all of Grantor's right, title and interest, specifically including his statutory right of redemption arising from the tax sale confirmed by Decree of the Hamilton County Chancery Court, in and to the following described real estate in Hamilton County, State of Tennessee, to-wit:

IN THE SECOND CIVIL DISTRICT, HAMILTON COUNTY, TENNESSEE:

Lot Thirty-five (35), Logan Heights, a subdivision, as shown by plat of record in Plat Book 13, page 74, Registrar's Office, Hamilton County, Tennessee. According to said plat, said lot fronts fifty (50) feet on the western line of Rotary Drive and extends westerly between parallel lines one hundred fifty (150) feet to the western line of said subdivision.

SUBJECT TO AND TOGETHER WITH:

Any governmental zoning and subdivision ordinances in effect thereon.
 All notes, stipulations, restrictions, easements, conditions, and regulations as set out on recorded plat.

1. HAMILTON COUNTY, AND PLAT OF THE STATE OF TENNESSEE, ET AL VERSUS TAX YEAR 2010 DELINQUENT TAXPAYERS, CHANCERY COURT, REAL ESTATE SALE, CONSOLIDATED TAX CAUSE, COUNTY DOCKET #11220, Item # 1763, entry date, June 3, 2014, ORDER dated, June 16, 2014.

2015 JUN 15 AM 10:08

FILED
 HAMILTON CO CLERK & MASTER
 CX CX

Being the same property conveyed to Cara Woods and wife, Emma Woods by Warranty Deed from Ethnos Woods and wife, Cora Woods, recorded on September 5, 1965, in instrument recorded at Book 1642, Page 471, Register's Office of Hamilton County, Tennessee.

The above-described property is improved property known as: 5270 Rotary Drive, Chattanooga, Tennessee.

IN WITNESS WHEREOF, Grantor has caused this instrument to be executed on the date first above written.

GRANTOR:

Cara Woods
Cara Woods

SS.

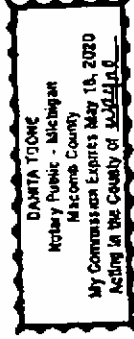
STATE OF Michigan)

COUNTY OF Wayne)

BEFORE ME, the undersigned Notary Public of the State and County aforementioned, personally appeared Cara Woods, with whom I am personally acquainted, or proved to me on the basis of satisfactory evidence, and who, upon oath, acknowledged himself to be the within named bargainor, and that he executed the foregoing instrument for the purpose therein contained.

WITNESS my hand and seal, this 2nd day of June, 2015.

Danita Toome
NOTARY PUBLIC
My Commission Expires: 5-18-2028



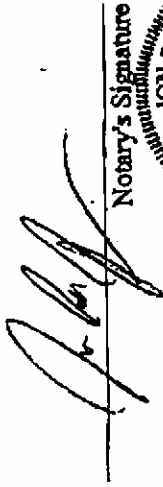
True Copy Certification

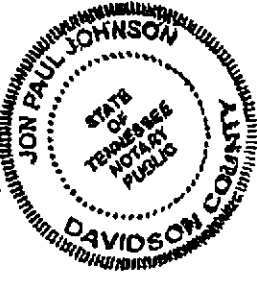
I, Charles Walker, do hereby make oath that I am a licensed attorney and/or the custodian of the electronic version of the attached document tendered for registration herewith and that this is a true and correct copy of the original document executed and authenticated according to law.


Signature

State of Tennessee
County of Davidson

Personally appeared before me, Jon Johnson, a notary public for this county and state, Charles Walker, who acknowledges that this certification of an electronic document is true and correct and whose signature I have witnessed.


Notary's Signature



My Commission Expires: 2/3/17

Tax \$3.75 Fee 15c Total \$3.90 Paid Jan. 21, 1946, Jack Hixson County Court Clerk
IN CONSIDERATION of the sum of One Dollar (\$1.00) cash in hand paid, and other good and valuable considerations, the receipt and sufficiency of which is hereby acknowledged;
We, CARL AUSTIN ERLANDSON and wife, NELLIE B. ERLANDSON, do hereby sell, transfer and convey unto WILLIAM MARVIN RECORD and wife, CRYSTAL RECORD, the following described Real Estate:

IN THE CITY OF CHATTANOOGA, HAMILTON COUNTY, TENNESSEE: Lot No. Fifteen (15), Block No. Two (2), Arlington Heights, as shown by plat recorded in Plat Book 5, page 21, of the Register's Office of Hamilton County, Tennessee. Said lot fronts 50 feet on the West line of Arlington Avenue, and extends back Westwardly between parallel lines 135 feet to an alley.

SUBJECT TO City of Chattanooga Zoning Ordinance No. 1843 and amendments thereto.

Taxes for the Year 1946, are assumed by the Grantors herein.

TO HAVE AND TO HOLD the said described real estate unto William Marvin Record and wife, Crystal Record, their heirs and assigns, forever in fee simple.

We covenant that we are lawfully seized and possessed of said real estate; have good right and lawful authority to sell and convey the same; that the title thereto is clear, free and unencumbered, excepting as set out above; and we will forever warrant and defend the same against all other lawful claims.

WITNESS our hands, on this the 5th day of January, 1946.

Internal Revenue Stamps \$2.75

attached and canceled.

STATE OF ILLINOIS)

COUNTY OF COOK)

Carl Austin Erlandson

Nellie B. Erlandson

On this 9th day of January, 1946, before me personally appeared Carl Austin Erlandson and wife, Nellie B. Erlandson, to me known to be the persons described in and who executed the foregoing instrument, and acknowledged that they executed the same as their free act and deed.

In Witness Whereof I have hereunto set my hand and Notarial Seal.

x x x x x x x x x x x x x x x x x x x
Kathryn Hahn, Notary Public
Cook County, Ill.

Kathryn Hahn, Notary Public

My Commission Expires Sept. 10, 1946

STATE OF TENNESSEE

Hamilton County The above Instrument and certificate were filed Jan. 21, 1946, at 3:20 P. M. entered in Note Book No. 39, Page 381, and recorded in Book 907, Page 20.

WITNESS my hand at office in Chattanooga, Tenn.

WILLIAM THOMPSON
W. Thompson
Register
Dept. Reg.

x x x x x x x x x x x x x x x x x x x
Tax \$5.00 Fee 15c Total \$5.15 Paid Jan. 21, 1946, Jack Hixson County Court Clerk
FOR AND IN CONSIDERATION of ONE (\$1.00) DOLLAR, cash in hand paid, and other good and valuable considerations, the receipt of all of which is hereby acknowledged;

I, WILLIE GRAHAM, Widow of T. O. GRAHAM, do hereby sell, transfer and convey unto WILLIAM D. DAVIS and wife, OLIVIA P. DAVIS, the following described real estate in the City of Chattanooga, Hamilton County, Tennessee, to-wit:

Lot Twenty-five (25) and twenty-seven (27), Block Five (5), Belvoir Park, as recorded in Plat Book 8, page 49, of the Register's Office of Hamilton County, Tennessee.

SUBJECT TO City of Chattanooga Zoning Ordinance No. 1843 and any amendments thereto.

TO HAVE AND TO HOLD the same unto the said WILLIAM D. DAVIS and wife, OLIVIA P. DAVIS, their heirs and assigns forever in fee simple.

I COVENANT that I as lawfully seized and possessed of said real estate, have good right and lawful authority to sell and convey the same, that the title thereto is clear, free and unencumbered, and I will forever warrant and defend the same against all lawful claims.

907

RECORD BOOK

FILED

15 JUN 30 AM 11:20

CLERK OF MASTER
CHATTANOOGA COUNTY CT

WITNESS my hand on this the 14th day of January, 1946.

Internal Revenue Stamp \$1.10 Willie Graham

attached and canceled.

STATE OF TENNESSEE

COUNTY OF HAMILTON

On this 17th day of January, 1946, before me personally appeared WILLIE GRAHAM, to me known to be the person described in and who executed the foregoing instrument, and acknowledged that she executed the same as her free act and deed.

My Commission expires Oct. 22, 1947
 My Commission expires Oct. 22, 1947
 My Commission expires Oct. 22, 1947

STATE OF TENNESSEE

Hamilton County The above instrument and certificate were filed Jan. 21, 1946, at 3:20 P. M. entered in Note Book No. 39, Page 381, and recorded in Book 907, Page 20.

WITNESS my hand at office in Chattanooga, Tenn.

WILLIE T. THAMMER Registrar

W. T. Thammer Dept. Reg.

Tax \$1.50 Per 15c Total \$1.65 Paid Jan. 21, 1946, Jack Hixson County Court Clerk FOR AND IN CONSIDERATION OF ONE (\$1.00) DOLLAR, cash in hand paid, and other good and valuable considerations, the receipt of all of which is hereby acknowledged:

WE, W. M. LONG and wife, M. SUE LONG, do hereby sell, transfer and convey unto THEODORE R. ELASTER and wife, OSSIE ELASTER, the following described real estate in the City of Chattanooga, Hamilton County, Tennessee, to-wit:

Lot No. Forty-two (42) Stanley Subdivision of DeLong tract, as shown by plat recorded in Plat Book 2, page 14, of the Registrar's Office of Hamilton County, Tennessee. Said lot fronts 40 feet on the North line of Jackson Avenue and extends back Northwardly, between parallel lines, 58.6 feet to an alley.

SUBJECT TO City of Chattanooga Zoning Ordinance No. 1843 and any amendments thereto.

TO HAVE AND TO HOLD the same unto the said THEODORE R. ELASTER and wife, OSSIE ELASTER, their heirs and assigns forever in fee simple.

WE COVENANT that we are lawfully seized and possessed of said real estate, have good right and lawful authority to sell and convey the same, that the title thereto is clear, free and unencumbered, and we will forever warrant and defend the same against all lawful claims.

WITNESS our hands on this the 15th day of January, 1946.

Internal Revenue Stamp \$1.10 Wm. Long
M. Sue Long

attached and canceled.

STATE OF TENNESSEE

COUNTY OF HAMILTON

On this 15th day of Jan., 1946, before me personally appeared W. M. LONG and wife, M. SUE LONG, to me known to be the persons described in and who executed the foregoing instrument, and acknowledged that they executed the same as their free act and deed.

My Commission expires Oct. 22, 1947
 My Commission expires Oct. 22, 1947
 My Commission expires Oct. 22, 1947

STATE OF TENNESSEE

Hamilton County The above instrument and certificate were filed Jan. 21, 1946, at 3:20 P. M. entered in Note Book No. 39, Page 381, and recorded in Book 907, Page 21.

WITNESS my hand at office in Chattanooga, Tenn.

WILLIE T. THAMMER Registrar

W. T. Thammer Dept. Reg.

RECORD BOOK 907

AFFIDAVIT OF HEIRSHIP		OATH OF CONSIDERATION: T.C.A. § 67-4-409(a)(3)(D) exempts this instrument from tax and T.C.A. § 67-4-409(a)(5) further provides the valuation oath is unnecessary, the affidavit being used to evidence transfer of title to the property to a beneficiary	
THIS INSTRUMENT PREPARED BY: WALKER LAW OFFICES 10 THOMPSON LANE NASHVILLE, TENNESSEE 37211 OFFICE: (615) 463-3760			
ADDRESS OF NEW OWNER(S) James Hixson c/o REO Holdings, LLC Charles Walker, Attorney 69 Thompson Lane Nashville, TN 37211		SEND TAX BILLS TO: Same	MAP PARCEL NUMBER(S) 157.1 N 008
		Book/Page GI 10481 / 778	return# 2015060200108

AFFIDAVIT OF HEIRSHIP 3 Page AFFIDAVIT Value of \$0
Recorded by MHS on 6/2/2015 at 12:15 PM

S.S.
STATE OF TENNESSEE
COUNTY OF DAVIDSON

COMES NOW my affiant, James Hixson, and after first being

TOTAL FEES \$19.00

say:

State of Tennessee Under Court
Register of Deeds
PAM HURST

My name is **JAMES HIXSON** and I am an adult citizen and resident of Davidson County, Tennessee, and after first being

I currently reside at **795 Lay Ave, Red Bluff, GA.**

I have personal knowledge of the matters set forth herein.

William Davis Sr., and wife, Glenna P. Davis owned and lived in the property at 16 N. Parkdale Ave. in Hamilton County, Tennessee. William Davis Sr. predeceased his wife, Glenna P. Davis, leaving her as sole owner of property by operation of law and Will filed in Hamilton County Chancery Court number P-4450.

Glenna P. Davis, was a resident and citizen of Hamilton County, Tennessee, at the time of her death on April 18, 2004.

Glenna Davis was born to Bernard and Willie Peckinpugh Hixson and was raised by Ann and John Peckinpugh. Glenna Davis was one of seven children. Her siblings include: James Hixson, Ida Nise Smith, Ralph Hixson, Anna Marie Guthrie, Willie Henderson, and Georgie Hudlow. James Hixson is the only surviving sibling of Glenna Davis.

Glenna P. Davis, died in Hamilton County, Tennessee, on April 18, 2004, leaving behind a granddaughter named Kimberly Lynn Davis. Glenna P. Davis had one son, William Davis Jr., who predeceased her. The only child of William Davis Jr. was Kimberly Lynn Davis.

Kimberly Lynn Davis did not have any issue.

Kimberly Lynn Davis died on July 2, 2010. She had no children and was not married. No will or probate was filed with the Hamilton County Court Probate Court.

James Hixson, the brother of Glenna P. Davis, is the surviving heir to Glenna P. Davis and Kimberly Lynn Davis.

This Affidavit of Heirship is freely given pursuant to Section 30-2-712, et seq., of the Tennessee Code Annotated, based on the personal knowledge of the affiant, to help establish and reflect the heirship with respect to any real or personal property owned by Glenna P. Davis and Kimberly Lynn Davis in Hamilton County, Tennessee, or elsewhere, and particularly to confirm the vesting of title in fee simple to certain real property in Hamilton County, Tennessee, described as follows:

A tract or parcel of land in Hamilton County, Tennessee, described as follows to wit:

Lots Twenty-five (25) and twenty-seven (27), Block five (5), Belvoir Park, as recorded in Plat Book 8, page 49, of the Register's Office of Hamilton County, Tennessee.

Being the same property conveyed to William D. Davis and wife, Glenna P. Davis from Willie Graham by deed of record in Book 907 Page 20 of said Register's Office.

This is improved property known as 16 N. Parkdale Ave, Chattanooga, TN.

This is to confirm the vesting of the above described property in James Hixson.

FURTHER AFFIANT SAYETH NAUGHT.

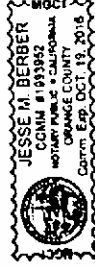

James Hixson

S.S.
STATE OF California
COUNTY OF Orange

Before me, a Notary Public, duly appointed, commissioned and qualified in and for the State and County aforesaid, personally appeared James Hixson, the within named bargainer, with whom I am personally acquainted or proved to me on the basis of satisfactory evidence to be the person described in the foregoing, who, upon oath, signed, sealed and delivered the foregoing instrument in my presence, and who, upon oath, acknowledged that she/he executed the foregoing instrument for the purposes therein contained as her/his free act and deed.

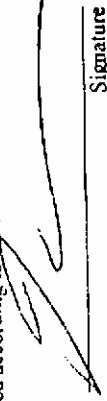
IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal at my office in said County, on this 17 day of Nov, 2010.


Notary Public



True Copy Certification

I, Charles Walker, do hereby make oath that I am a licensed attorney and/or the custodian of the electronic version of the attached document tendered for registration herewith and that this is a true and correct copy of the original document executed and authenticated according to law.



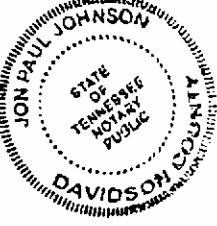
Signature

State of Tennessee
County of Davidson

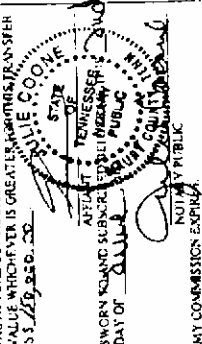
Personally appeared before me, Jon Johnson, a notary public for this county and state, Charles Walker, who acknowledges that this certification of an electronic document is true and correct and whose signature I have witnessed.



Notary's Signature



My Commission Expires: 7/3/17

QUITCLAIM DEED GI 10481 / 962 Book Page 20-5060200132 Instrument 20-5060200132 3 Page QUITCLAIM DEED Value of \$150000.00 Recorded by MNS on 5/22/15 at 1:05 PM		OATH OF CONSIDERATION: I, <u>STATE OF TENNESSEE</u> COUNTY OF <u>HAMILTON</u> , THE ACTUAL CONSIDERATION ON FAIR MARKET VALUE WHICH IS GREATER THAN THE TRANSFER IS <u>\$150,000.00</u>	
Conveyance Tax \$555.00 Deed Recording Fee \$15.00 Data Processing Fee \$2.00 Probate Fee \$1.00 eFile Fee \$2.00 TOTAL FEES \$575.00			
State of Tennessee Hamilton County, Pam Hurst Register of Deeds Electronic Recording by Signature		IT PREPARED BY: WOLFGANG LAW OFFICES 69 THOMPSON LANE NASHVILLE, TENNESSEE 37211 OFFICE: (615) 463-3760	
ADDRESS OF NEW OWNER(S): REO Holdings, LLC c/o Charles Walker, Attorney 69 Thompson Lane Nashville, Tennessee 37211		SEND TAX BILLS TO Same	MAP-PARCEL NUMBER(S) 1571 N 008

QUITCLAIM DEED

THIS INSTRUMENT, made and entered into this 08 day of May, 2015, by and between James Hixson, a single person, ("Grantor") and REO Holdings, LLC, a Tennessee Limited Liability Company ("Grantee").

WITNESSETH:

FOR AND IN CONSIDERATION of the sum of ten dollars (\$10) and other good and valuable consideration, the receipt and legal sufficiency of which are hereby acknowledged, Grantor does hereby convey, transfer, remise, release, relinquish and quitclaim unto Grantee, Grantee's heirs and assigns, all of Grantor's right, title and interest, specifically including his statutory right of redemption arising from the tax sale confirmed by Decree of the Hamilton County Chancery Court, in and to the following described real estate in Hamilton County, State of Tennessee, to-wit:

IN THE CITY OF CHATTANOOGA, HAMILTON COUNTY, TENNESSEE:

Lots Twenty-five (25) and twenty-seven (27), Block five (5), Belvoir Park, as recorded in Plat Book 8, page 49, of the Register's Office of Hamilton County, Tennessee.

Being the same property devised in James Hixson by Affidavit of Heirship recorded in Book 64, Page 472, Register's Office of Hamilton County, Tennessee.

The above-described property is improved property known as: 16 N. Parkdale Ave., Chattanooga, Tennessee.

IN WITNESS WHEREOF, Grantor has caused this instrument to be executed on the date first above written.

1. HAMILTON COUNTY AND PART OF THE STATE OF TENNESSEE, ET AL VERSUS TAX YEAR 2010 DELINQUENT TAXPAYERS, CHANCERY COURT, REAL ESTATE SALE, CONSOLIDATED TAX CAUSE, COUNTY DOCKET #1122, Item # 01011, Case Set, June 1, 2014, ORDER dated June 16, 2014

FILED

2015 JUN 30 AM 11:21

CLERK OF COURT
HAMILTON COUNTY CHANCERY CT.

DC&M

GRANTOR:

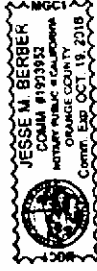
James Hixson
James Hixson

SS.
STATE OF California)
COUNTY OF Orange)

BEFORE ME, the undersigned Notary Public of the State and County aforementioned, personally appeared James Hixson, with whom I am personally acquainted, or proved to me on the basis of satisfactory evidence, and who, upon oath, acknowledged herself to be the within named bargainer, and that she executed the foregoing instrument for the purpose therein contained.

WITNESS my hand and seal, this 27 day of May, 2015.

[Signature]
Notary Public



True Copy Certification

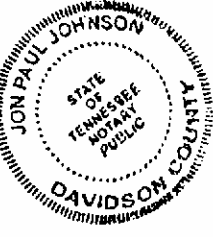
I, Charles Walker, do hereby make oath that I am a licensed attorney and/or the custodian of the electronic version of the attached document tendered for registration herewith and that this is a true and correct copy of the original document executed and authenticated according to law.


Signature

State of Tennessee
County of Davidson

Personally appeared before me, Jon Johnson, a notary public for this county and state, Charles Walker, who acknowledges that this certification of an electronic document is true and correct and whose signature I have witnessed.


Notary's Signature



My Commission Expires: 2/3/17