

IN THE COURT OF COMMON PLEAS
TRUMBULL COUNTY, OHIO

STATE OF OHIO ex rel. CITY OF WARREN :
391 Mahoning Avenue NW :
Warren, OH 44483, :

and :

ROBERT PINTI, :
DEPUTY HEALTH COMMISSIONER, :
CITY OF WARREN :
418 Main Avenue SW :
Warren, OH 44481, :

Plaintiffs, :

v. :

EURO-AMERICAN FINANCE :
NETWORK, INC. :
c/o Slavoljub Stefanovic, Registered Agent :
6624 Woody Court :
Leesburg, FL 34748, :

and :

LJUBICA STEFANOVIC :
6624 Woody Court :
Leesburg, FL 34748, :

and :

SLAVOLJUB STEFANOVIC, :
President, Euro-American Finance Network, Inc. :
6624 Woody Court :
Leesburg, FL 34748, :

Defendants. :

CASE NO. 13CV764

JUDGE McKay

COMPLAINT

KAREN HENRIQUE ALLEN
CLERK OF COURTS
TRUMBULL COUNTY
2013 APR -5 AM 10:10
TRUMBULL COUNTY
CLERK OF COURTS

Now come the PLAINTIFFS, the City of Warren, Ohio, and Robert Pinti, Deputy Health Commissioner for the City of Warren, Ohio, and state as follows:

THE PARTIES

1. Plaintiff, the City of Warren, is a municipal corporation organized and operating pursuant to Article XVIII, Section 3, of the Constitution of the State of Ohio.

2. Plaintiff, Robert Pinti, in his official capacity, is the Deputy Health Commissioner for the City of Warren, Ohio.

3. Plaintiffs, the City of Warren and Robert Pinti in his official capacity, have duly authorized the Ohio Attorney General's Office to act jointly and on its behalf in this matter.

4. Defendant, Euro-American Finance Network, Inc. (hereinafter, "Euro-American Finance"), is a corporation organized and existing under the laws of the State of Florida. Euro-American Finance is the owner of record of the real property located at 1300 and 1307 North Tod Avenue, Warren, Ohio 44485 (Parcel No. 39-005996), together with all improvements situated thereon.

5. Defendant, Ljubica Stefanovic, is the owner of record of the real property located at 1300 and 1307 North Tod Avenue, Warren, Ohio 44485 (Parcel No. 39-005996), together with all improvements situated thereon. Additionally, Ljubica Stefanovic is the wife of Slavoljub Stefanovic.

6. Defendant, Slavoljub Stefanovic, is the President and Registered Agent for Euro-American Finance, and is authorized to act on behalf of the corporation. Additionally, Slavoljub Stefanovic is the husband of Ljubica Stefanovic.

JURISDICTION

7. Plaintiffs incorporate herein, by reference, each and every allegation contained in paragraphs 1-6.

8. This action is brought pursuant to Ohio Revised Code Section 3767.03, which permits the chief legal officer of a municipal corporation to bring an action to enjoin any nuisance within the jurisdiction of this Court.

9. This action is also brought pursuant to Ohio Revised Code Section 3781.15, which permits the health department of a municipal corporation to institute a proceeding to enjoin the use or occupation of any building which is declared by Ohio Revised Code Sections 3781.06-3781.18, 3781.031, and 3791.04 to be a public nuisance.

10. This action is also brought pursuant to Ohio Revised Code Sections 715.26, 715.261, and 715.44, which authorize a municipal corporation to remove buildings and structures which are insecure, unsafe, or structurally defective and/or a nuisance and to recover the costs from owner by a civil action.

11. This action is also brought pursuant to the inherent equitable power of this Court to enjoin and/or order actions, activities, or conditions either through a preventative or mandatory injunction where there exists no other adequate remedy at law and irreparable damage or injury would occur without the Court's intervention.

12. Plaintiffs also seek declaratory relief pursuant to Ohio Revised Code Section 2721.01 *et seq.* as to the rights, status, relations, and responsibilities of the parties for the costs to remove/raze the property that is the subject of these proceedings.

FACTS COMMON TO ALL COUNTS

13. Plaintiffs incorporate herein, by reference, each and every allegation contained in paragraphs 1-12.

14. In November 2012, representatives from the City of Warren Building Inspection Department inspected the property located at 1307 North Tod Ave., Warren, Ohio 44485 ("the property").

15. Upon inspection of the property, the building located thereon was determined to be vacant. As a result, the City of Warren Building Inspection Department ordered Defendants to immediately secure the building located on the property. See Exhibit A.

16. In addition, the City of Warren Building Inspection Department ordered Defendants to make further corrections to bring the property into compliance with city and state laws. See Exhibit A.

17. Also in November 2012, representatives from the City of Warren Health Department inspected the property located at 1307 North Tod Ave., Warren, Ohio 44485.

18. Upon inspection of the premises, several health violations were noted. As a result, the City of Warren Health Department issued a condemnation notice on November 16, 2012. See Exhibit B.

19. Defendants did not comply with the orders of the Building Inspection Department or the Health Department.

20. As a result of Defendant's inaction, the City of Warren Board of Health issued a demolition order for the property on January 30, 2013. See Exhibit C.

21. Defendants neither complied with the demolition order issued by the Board of Health nor appealed the order within the 30 days immediately following said order.

COUNT ONE

22. Plaintiffs incorporate herein, by reference, each and every allegation contained in paragraphs 1-21.

23. The property located at 1307 North Tod Ave., Warren, Ohio 44485, is a serious safety hazard and a public nuisance as defined in O.R.C. 3767.41. Serious injury and even death may occur to persons who would enter the premises, including, but not limited to, safety service personnel.

24. The City of Warren has an affirmative statutory duty to enforce safety violations within its jurisdiction and immediate abatement of this hazard and public nuisance by removal/razing is necessary to protect the public health and safety.

25. Defendants, Euro-American Finance Network Network, Inc., Ljubica Stefanovic, and Slavoljub Stefanovic, are responsible for said public nuisance and serious hazard as the owners of the property and should immediately abate the nuisance by demolishing said property.

COUNT TWO

26. Plaintiffs incorporate herein, by reference, each and every allegation contained in paragraphs 1-25.

27. Plaintiffs have completed administrative procedures for the demolition of the property, but Defendants have failed to timely abate the serious safety hazard posed by the property.

28. Since Defendants have failed to abate the nuisance expeditiously, the City of Warren is entitled to cause removal of the serious safety hazard and the public nuisance presented by the property; however, Plaintiffs are currently without sufficient financial resources to pay for the costs of the demolition.

29. Defendants, as owners of the property, are responsible for the cost of removing the structures located at 1307 North Tod Ave., Warren, Ohio 44485.

COUNT THREE

30. Plaintiffs incorporate herein, by reference, each and every allegation contained in paragraphs 1-29.

31. As a consequence of Defendants' failure to take action as required by Ohio law and the Warren City Health Code, the City of Warren has incurred expenses for the inspections and police visits to the property.

32. The City of Warren will incur future expenses for the cost of razing the property if Defendants fail to take action as required.

COUNT FOUR

33. Plaintiffs incorporate herein, by reference, each and every allegation contained in paragraphs 1-32.

34. A separate structure was previously located at 1300 North Tod Ave., Warren, Ohio 44485.

35. On February 2, 2012, Defendants consented to the razing of the structure located at 1300 North Tod Ave., Warren Ohio 44485. See Exhibit D.

36. On April 12, 2012, the structure located at 1300 North Tod Ave, Warren, Ohio 44485, had deteriorated to such a degree that an emergency was declared and the Director of Service-Safety for the City of Warren issued an emergency demolition order. See Exhibit E.

37. The City of Warren demolished said property, incurring expenses of *Five Thousand Five Hundred Dollars* (\$5,500.00). See Exhibit F.

38. On or about November 16, 2012, the City of Warren issued an Invoice to Defendants for the costs associated with the demolition. See Exhibit G.

39. Pursuant to O.R.C. 715.261, Defendants owe to the City of Warren the amount of *Five Thousand Five Hundred Dollars* (\$5,500.00), together with interest from November 16, 2012, and Defendant has failed or refused to pay said amount.


WHEREFORE, Plaintiffs request that the Court issue the following orders:

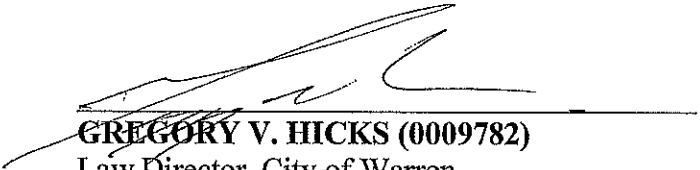
An Order requiring Defendants comply with the City's demolition Order in order to avoid potential safety risks to persons and safety personnel, plus costs and expenses incurred. In the Alternative, require the Defendants reimburse the City of Warren if the City must execute and finance the demolition of the property itself.

In addition, a judgment against Defendants in the amount of *Five Thousand Five Hundred Dollars* (\$5,500.00), together with interest, and to costs of this action, and other such relief as this Court may deem appropriate.

Respectfully submitted,

MICHAEL DEWINE (0009181)
OHIO ATTORNEY GENERAL


AMBER WOOTTON HERTLEIN (0083858)
WALTER J. McNAMARA IV (0074570)
Attorneys for Plaintiff, City of Warren
Assistant Attorneys General
30 E. Broad Street, 17th Floor
Columbus, OH 43215
Tel: 614.752.6733
Amber.Hertlein@OhioAttorneyGeneral.gov
Walter.McNamara@OhioAttorneyGeneral.gov


GREGORY V. HICKS (0009782)
Law Director, City of Warren
391 Mahoning Avenue, NW
Warren, OH 44483
Tel: 330.841.2605
Fax: 330.841.2906
ghicks@warren.org

INSTRUCTIONS FOR SERVICE

TO THE CLERK OF COURTS:

Please issue service of summons, together with a copy of the foregoing Complaint to the Defendants listed in the caption of the case by U.S. Certified Mail, return receipt requested and make the same returnable according to law.


GREGORY V. HICKS (0009782)
Law Director, City of Warren
Attorney for Plaintiffs

Jason Burns

From: Chris Taneyhill <Inspect1@warren.org>
Sent: Thursday, November 15, 2012 11:46 AM
To: Lyub Stefanovic
Cc: Willian D. Franklin; ecantalamessa@warren.org; Bob Pinti; dlake@warren.org; Jason Burns
Subject: 1307 Tod Avenue N.W. - Dangerous Building / Public Nuisance Declared

To: Euro-American Finance Network Inc. **Attention:** Slavojub Stefanovic, President

You are to immediately secure the above subject property/building in accordance with the City of Warren, Ohio Codified Ordinance as described below.

Ohio Building Code orders to follow via certified mail.

Chapter 1323 Unsafe Structures.

1323.02 (c) Materials. The effective boarding of a structure includes, but is not limited to, doors, windows or other areas of the structure open to ingress and egress, and to weather elements, at any and all levels of the structure. Each such opening shall be secured by 3/4 inch thick C.D.X. plywood cut to fit neatly against the jamb or frame, and recessed whenever possible. Two 2x4's shall be cut to the width of the plywood dimension. All exposed surfaces of the plywood and 2x4's shall receive one sufficient coat of paint (which shall match the existing siding or trim color) prior to assembly and installation. The two 2x4's shall be cut at least 6 inches longer than the interior opening width. Two minimum 1/2 inch diameter carriage bolts of sufficient length shall be extended through evenly spaced holes drilled through the exterior 2x4's. All plywood and interior 2x4's shall be secured with washers and nuts. A diagram of the aforescribed is available at the City's Engineering, Planning and Building Departments.

- (1) **Scope:** All such openings located below ten feet measured vertically from grade or a readily accessible surface, and such openings located less than six feet horizontally from any readily accessible surface, shall be barricaded.
- (2) **Methods:** Single hung and sliding windows shall be opened fully to install the barricade. Double hung windows shall be opened by raising the bottom sash and lowering the top sash respectively to the 1/2 open positions and installing the barricade bolts through these openings.
- (3) **General:** Fire escape stairs and drop ladders shall be chained and locked in the up position. If the fire escape cannot be rendered reasonably inaccessible in this manner, all windows along the fire escape shall be barricaded.
- (4) **Cleaning:** All trash, garbage, rubbish, debris and motor vehicles shall be removed from the premises. All grass and weeds shall be cut.

Thank you in advance for your immediate cooperation in this matter.

Christopher A. Taneyhill

Chief Building Official

City of Warren, Ohio

(330) 841-2617



**BUILDING INSPECTION DEPARTMENT
CITY OF WARREN, OHIO
540 Laird Avenue S.E., Warren, OH 44484
www.warren.org
Phone: (330) 841-2617 – Fax: (330) 841-2614**

ADJUDICATION ORDER No: 12-1115-1101

Violation Notice / OBC 109.4 Unsafe Buildings

November 16, 2012

Building in violation: 1307 Tod Avenue N.W.

Building Description: Vacant multi-story non-residential building formerly known as St. Joseph Hospital and Riverside Square Complex.

Building Owner: Euro-American Finance Network, Incorporated
and Ljubica Stefanovic

Registered Agent: Slavoljub Stefanovic, President
6624 Woody Court
Leesburg, Florida 34748
Service Type: Certified mail 7009 2250 0001 3861 7764
U.S. Mail
Electronic Mail

**The following items have been found not to be in compliance.
2011 Ohio Building Code, (OBC) Chapter 34, Existing Buildings and Structures**

109.4 Unsafe buildings. Structures or existing equipment that are unsafe or unsanitary due to inadequate means of egress facilities, inadequate light and ventilation, or which constitute a fire hazard, or are otherwise dangerous to human life, shall be deemed a serious hazard. Where a building is found to be a serious hazard, such hazard shall be eliminated or the building shall be vacated, and where such building, when vacated, remains a serious hazard, it shall be razed,

ITEM NO. CODE SECTION REFERENCE

1. **109.4 Unsafe buildings.** After inspection by the building official it was determined that the existing structure and its appurtenances has deteriorated to a condition which is being declared a serious hazard due to inadequate means of egress facilities, inadequate light and ventilation, and is in a condition where a significant risk to public safety is likely to occur. The building is currently vacated and is not occupied, the hazards that exist shall be eliminated, or the building shall be razed.
2. **105.1 Approvals required.** Any owner or authorized agent who intends to construct, enlarge, alter, repair, move, or change the occupancy of a building or structure, or portion thereof, or to repair, remove, demolish, convert or replace any electrical, gas, mechanical, plumbing system, other building service equipment, shall first make application to the building official and obtain the required approval.
3. **106.1 Submittal documents.** Before beginning the required demolition, alterations and repairs, the owner or the owner's representative shall submit construction documents for approval.
4. **106.1.1 Information on construction documents.** Construction documents, adequate for the scope of the project, shall include information necessary to determine compliance with the building, mechanical, plumbing, fire, electrical, energy, and fuel gas codes. In the case of demolition, the floor plan shall identify construction to be demolished and the location, arrangement, and dimensions of existing construction that is to remain. 106.1.1 (4)
5. **3405.1.1 Dangerous Conditions.** Regardless of the extent of structural or nonstructural damage, the building official shall have the authority to require the elimination of conditions deemed dangerous. Refer to attached corrections to make for compliance.

CORRECTIONS REQUIRED FOR COMPLIANCE

1. Restore the building, structures, and parts thereof, to a safe and sanitary condition and in accordance with Chapter 34 of the Ohio Building Code, Existing Buildings.
2. Restore all building service utilities.
3. Restore all fire-protection systems.
4. Replace all broken or cracked glass in windows and doors.
5. Weather coat (paint) all exterior trim.
6. Restore all mechanical ventilation systems.
7. Repair or replace all deteriorated roof areas.
8. Replace or repair interior and exterior ceilings, soffits, canopies and walls.
9. Pump all water from tunnels and basement area and keep maintained.
10. Remove and replace all water damaged materials.
11. Remove all combustible furnishings and materials from building.
12. Remove all mold from building.

COMPLIANCE DATE: December 30, 2012

COMMENTS/ DEPARTMENT REGULATIONS: The following comments reflect items that do not require responses but represent either information presented and used as a basis for determination of code conformance or items that the structure or owner is required to comply with but not specifically shown or indicated.

Comments	<ol style="list-style-type: none">1. Codified Ordinances of Warren Ohio – 1307.01 Permit Required. No person, firm, corporation or company shall perform any work in connection with the location, erection, construction, repair, alteration, moving or equipping of a building without first filing with the Building Division of the City an application in writing, and obtaining a formal permit for the work to be performed.2. The ordered repairs, removal, and alterations are due to the lack of maintenance and not due to normal service conditions, and are subject to the Ohio Building Code for alterations, repairs or the razing of the building and structures.
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Notices and Right to Appeal

In accordance with chapter 119 of the ORC, you have 30 days from the mailing date of an adjudication or citation order to request an appeal hearing. Include with request, a copy of the adjudication/citation order and a check or money order for \$200.00 made payable to the "Treasurer, State of Ohio" to the address listed below Ohio Board of Building Appeals 6606 Tussing Road-P.O. Box 4009 Reynoldsburg, Ohio 43068-9009. 614/644-2616 At this hearing you may be represented by counsel, present his/her arguments or contentions orally or in writing, and present evidence and examine witnesses appearing for or against him/her. Questions regarding this notice of violation shall be directed to the Building Official at the City of Warren, Ohio, Building Inspection Office, 540 Laird Avenue, S.E. Warren, Ohio 44484. All responses shall be forwarded to this office for review and processing. In the case of an appeal, an appropriate order shall be issued by the building official on the specific Ohio Building Code sections that are to be appealed.



Christopher A. Taneyhill, Chief Building Official

Warren City Health District
Division of Environmental Health
418 Main Ave. SW
Warren, OH 44481
330-841-2691

**NOTICE
OF
CONDEMNATION**

In accordance with Section 1367.11 CONDEMNATION PROCEEDINGS of Title 13--Housing Code of the Codified Ordinances of Warren, Ohio, the below described dwelling, dwelling unit, dwelling unit(s) or premise(s) has today been condemned and placarded as "Unfit for Human Habitation" due to the fact that the below described dwelling, dwelling unit(s), or premise(s) meets or exceeds those defect(s) or condition(s) indicated by an X(s) on the attached page(s) entitled "DWELLING UNIT(S) SUBJECT TO CONDEMNATION" that is hereby incorporated as if fully written.

ORDERS SERVED UPON:	
NAME: Euro-American Finance Network, Inc.	DATE: November 16, 2012
ADDRESS: 6624 Woody Ct.,	ADDRESS OF CONDEMNED DWELLING: 1307 N. TOD AVE., NW (22 PROPERTIES)
CITY/STATE/ZIP: Leesburg, FL 34748	CITY/STATE/ZIP: Warren, OH 44485

HEALTH OFFICIAL:



Attached hereto is a copy of the NOTICE OF VIOLATION CONDEMNED DWELLING(S) that details specific conditions(s) or violation(s) of Title 13--Housing Code of the Codified Ordinances of Warren, Ohio, pertaining to the above described dwelling, dwelling unit(s), or premise(s). The Specific violations are noted by Chapter and Section of Title 13--Housing Code of the Codified Ordinances of Warren, Ohio. Said copy of the NOTICE OF VIOLATION CONDEMNATION DWELLING(S) is hereby incorporated as if fully written.

Note that pursuant to Section 1367.11(b) Vacating Unit of Title 13--Housing Code that the above described dwelling, dwelling unit(s) or premise(s) shall be vacated upon receipt of this NOTICE OF CONDEMNATION, but no later than N/A. Also note that the tenants of occupants have also been notified by the Registered Sanitarian or Health Official to vacate the above described dwelling, dwelling unit(s) or premise(s) in the same period of time. If an exemption to the "Orders to Vacate" is given, it shall be in writing and filed along with this order.

Finally, be advised that you are, hereby ordered to correct all violations detailed on the enclosed copy of the NOTICE OF VIOLATION CONDEMNED DWELLING(S) so as to comply with the provisions of Title 13--Housing Code in thirty (30) days or demolish and remove the described dwelling, dwelling unit(s) or premise(s) within thirty (30) days upon receipt of this NOTICE OF CONDEMNATION. In the event that you fail to comply with this order, the Warren City Board of Health can and may order the demolition and removal of said dwelling, dwelling unit(s) or premise(s) described dwelling, dwelling unit(s) or premise(s) and shall certify the cost and expense of the demolition to the County Auditor and the same shall become a lien upon the real estate.

1367.11(e) REQUEST HEARING: Any person affected by any notice of an alleged violation under Section 1367.02 may request and shall be granted a hearing before the Warren City Board of Health, provided the request for such hearing is made within ten (10) days upon receipt of this notice.

The proceedings at such hearing, including the findings and decisions of the Board, are to be summarized, reduced to writing, and entered as a matter of public record in the office of the Health Official. Such record shall also include a copy of every notice or order issued in connection with the matter. Any person aggrieved by the decision of the Board may seek relief in any court of competent jurisdiction.

1367.99 PENALTY: Any person who violates a provision of this Housing Code shall be fined no more than five hundred dollars (\$500.00), and each day's failure to comply with any such provision shall constitute a separate violation.



WARREN CITY HEALTH DISTRICT
 DIVISION OF ENVIRONMENTAL HEALTH
 418 MAIN AVE. SW
 WARREN, OH 44481
 330-841-2691

**CONDEMNATION
 VIOLATIONS**

CONDEMNED ADDRESS: 1307 N. TOD AVE., NW (22 PROPERTIES)	NO. OF BEDROOMS:
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In accordance with Section 1367.11 Dwelling Units Subject to Condemnation, "The Health Officer of Registered Sanitarian shall condemn and placard as unfit for human habitation any dwelling, dwelling unit(s) or premise(s) which has any of the following defects" from Title 13 - Housing Code of the Codified Ordinances of Warren, Ohio, the above described dwelling, dwelling unit(s) or premise(s) has today been condemned and placarded as "Unfit for Human Habitation" due to the fact that the above described dwelling, dwelling unit(s) or premise(s) meets or exceeds the following defect(s) or condition(s) indicated by an X(s) below. (CHECK ALL APPLICABLE ITEMS)

ITEMS NOT IN COMPLIANCE	DEFECT(S), CONDITION(S) AND/OR VIOLATION(S) RELATING TO THE ABOVE DESCRIBED DWELLING, DWELLING UNIT(S) OR PREMISE(S) REQUIRED TO BE CORRECTED
X	Those which have become so damaged, dilapidated, decayed, unsanitary, unsafe or vermin infested of which so utterly fails to provide the amenities essential to decent living that they are unfit for human habitation or use or are so likely to cause sickness or disease that their condition constitutes a serious hazard to the health, morals, safety or general welfare of the occupants or other residents of the City;
X	Those having light, air, ventilation and sanitation facilities which are inadequate to protect the health, morals, safety or general welfare of human beings who live or may live herein or of the general public;
X	Those having improperly distributed loads upon the floors or roofs or in which the same are overloaded or have insufficient strength to be reasonably safe for the purpose used;
X	Those which have been damaged by fire, wind or other causes so as to have become dangerous to life, safety, morals or the general health and welfare of the occupants or other residents of the City;
	Those have inadequate facilities for ingress and egress in case of fire, panic or other emergencies or those having insufficient stairways, elevators, fire escapes or other means of egress;
X	Those which have parts thereof which are so attached that such parts may fall and injure occupants, other residents or other property;
X	Those which, because of their general condition or location are unsafe, unsanitary or otherwise dangerous to the health, morals, safety or general welfare of the occupants or other residents of the City;
X	Those existing in violation of any provisions of the Building Code, Zoning Code, the Fire Prevention Code, the Housing Code or other Ordinances of the City or Resolutions adopted by the Warren City Board of Health;
	Those whose interior walls or other vertical structural members list, lean or buckle to such an extent that a plumb line passing through the center of gravity falls outside the middle third of it's base;
	Those which, exclusive of the foundation, show thirty-three per cent (33%) or more of damage or deterioration of the supporting members or fifty per cent (50%) of damage or deterioration of the non-supporting, enclosing or outside walls or covering;

HOUSING CODE:- TITLE 13

ITEMS NOT IN COMPLIANCE	CODE SECTION NUMBER	DEFECT(S), CONDITION(S) AND/OR VIOLATION(S) PERTAINING TO THE ABOVE DESCRIBED DWELLING, DWELLING UNIT(S) OR PREMISE(S) REQUIRED TO BE CORRECTED
X	1367.11	No dwelling unit which has been condemned and placarded as unfit for human habitation shall be reoccupied until written approval is obtained from the Health Official;

X	1368.01	Immediately secure dwelling unit, including windows, to prevent the entrance of any person(s) or animal(s);
X	1368.02	Remove from both the interior and outside premises all bulky waste, garbage, refuse, rubbish and any other offensive material that have accumulated.
X	1368.04	Have a professional exterminator eliminate all insects, rodents, vermin and/or other pests;
X	1368.05	Have all grass, weeds, etc. on the premise(s) cut and maintained to a height of six inches (6") or less;
X	1369.02/3	Have all sinks, bathtubs, showers and flush water closets properly installed and put in good working order. Bathroom(s) shall be a separate room;
X	1369.06	Provide heated water to all sinks, bathtubs and showers. Water heater must be capable of maintaining a water temperature of at least one hundred twenty (120) degrees Fahrenheit at all times;
X	1371.02	Provide adequate light and ventilation to all habitable rooms. Properly glazed and provide suitable hardware for windows where necessary. Total window(s) area shall not be less than fifteen per cent (15%) of the room floor area;
X	1371.04	Provide heating facility capable of maintaining a temperature of seventy (70) degrees Fahrenheit to all habitable rooms. Have heating facility inspected and approved by the Warren City Building Department.
X	1371.05	The wiring does not meet current requirements and must be corrected. All repairs must be done in accordance with the Warren Electrical Code with necessary permits obtained from the Warren City Building Department. Consult a licensed electrical contractor to have the necessary work performed.
X	1371.07	Provide window and door screens where necessary.
X	1375.02(a)	Have all floors, walls, ceilings and roofing made reasonably weather-tight, water tight and rodent proof; capable of affording privacy; and maintained in good repair;
X	1375.02(b)	Have all exterior surfaces, including those of accessory buildings, garages, etc., provided with sufficient covering to protect the structural surfaces and show not signs of deterioration or disrepair;
X	1375.02(c)	Have all roof surfaces put in good repair and show no evidence of leakage;
X	1375.02(d)	Install gutters and/or downspouts around all roof surfaces according to City Code requirements;
X	1375.03	Replace all broken windows. Have all windows and exterior and interior doors put in good working condition and in a reasonably weatherproof condition;
X	1375.04	Have all porches, supports and interior and exterior stairway steps, etc. put in good, safe working condition;
X	1375.05	Have existing plumbing fixtures and water and waste pipes put in good sanitary condition; free of leaks and obstructions;
X	1377.01	Provide adequate refuse storage containers for occupants;
X	1377.03	Have dwelling unit(s) cleaned and sanitized prior to reoccupancy;
X	1377.05	Obtain all required permits, licenses, etc. from the Warren City Building Department for installation of equipment and/or major repair work. Have all municipal and public utilities connected and/or available prior to occupancy.

Anthony L. O.

November 16, 2012

REGISTERED SANITARIAN

DATE



WARREN CITY HEALTH DISTRICT
 DIVISION OF ENVIRONMENTAL HEALTH
 418 MAIN AVENUE, S.W.
 WARREN, OH 44481-1060
 330-841-2612 - FAX 330-841-2912



Subhash Khaterpaul M.D., Health Commissioner
 Robert R. Pinti, Deputy Health Commissioner

Doug Franklin, Mayor
 Mildred Gilkes
 Atty. Charles H. Ohlin
 Margaret Scott, Pro Tem
 JoAnna Stencloca-Barran
 Hortense Wood

February 5, 2013

Euro-American Finance Network Inc.
 Ljubica Stefanovic
 6624 Woody Court
 Leesburg FL 34748

To Whom It May Concern:

NOTICE OF BOARD RULING--ADMINISTRATIVE HEARING

Reference: 1307 North Tod Ave. Warren, OH 44485

The Warren City Board of Health has reviewed the records regarding the above referenced premise(s) at a public meeting held on January 30, 2013.

The decision handed down in this matter is as follows: demolition

Sincerely,

Robert R. Pinti
 Deputy Health Commissioner

5855 4715 0000 3914 5855
 2012 1010 0000 0000 0000 0000 0000 0000 0000 0000

U.S. Postal Service SM		
CERTIFIED MAILSM RECEIPT		
(Domestic Mail Only; No Insurance Coverage Provided)		
For delivery information, visit our website at www.usps.com		
ALSO SENT REGISTERED MAIL		
Postage \$		Postmark Here
Certified Fee		
First-Class Receipt Fee (Endorsement Required)		
Registered Delivery Fee (Endorsement Required)		
Total Postage & Fees \$		
Sent to Euro-American		
District, Apt. No., or P.O. Box No.		
City, State, ZIP+4		
PS Form 3800, August 2006		See Reverse for Delivery Information

PLAINTIFF'S EXHIBIT
 C

PAY 330-824-8899

PROPOSAL

Holton, Inc.
3259 Lyntz Road
Lordstown, Ohio 44481
330-824-2865

*Friday 12/11 - 3:25
A-213702499*

Proposal submitted to: Slava Stefanovic
c/o Euro-American Finance Network, Inc.
6624 Woody Ct.
Leesburg, FL.

Job Site: 1300 North Tod Ave., Warren, Ohio, Trumbull County

Parcel ID#: 39-005996; **Card #:** 89

We hereby submit specifications and estimates for:

Demolish the structures located at 1300 North Tod Ave., Warren, Ohio.

All blacktop will remain and we are not liable for replacement due to damage the equipment may cause during the demolition process.

The sewer will be capped and for the septic tank will be pumped and crushed and the proper authority will inspect the work. It has not been established at this time which sanitary applies to this dwelling.

We will fill in the area with dirt, place grass seed and straw on the affected area. We do not landscape. You can expect some settling in the affected area.

The demolition will be performed in accordance with the City of Warren's specifications.

We will remove all debris in accordance with all State and Federal Laws and dispose of it in a licensed landfill facility.

Holton, Inc. will call for utility shut off's and disconnects, but are not liable for any prior or final payments for these utilities.

OWNERS' ARE RESPONSIBLE FOR:

Asbestos testing and Asbestos Abatement if it is deemed necessary. (According to the Trumbull County Auditors site this parcel is commercial exempt. No testing is necessary).

Remove all personal items from the home. Anything left in the structures after the proposal is signed will fall under the salvage material paragraph below.

Call for final reading of all utilities.

Sign and return a copy of the proposal.

Sign and return a copy of the form allowing Holton, Inc. to obtain the proper permits.

Wire the full payment amount to the financial institute of Holton, Inc. choosing. All information to do so will be provided by Holton, Inc. to the owner's financial institution.

1 (A)



Salvage Material: In addition to the above, Holton, Inc. shall retain any and all materials removed from the premises that Holton, Inc. in its sole discretion deems to have salvage value. Owner and Holton, Inc. expressly acknowledge that the extent and value of said salvageable material, if any, is unknown and owner expressly waives any future claim to said material and any proceeds therefrom.

We propose hereby to furnish material and labor complete in accordance with above specifications for the sum of:

FIVE THIRTY NINE AND FIVE HUNDRED AND NO/100 DOLLARS (\$5,399.00).

Payment to be made as follows: The money must be deposited in Holton, Inc.'s financial institution before work will begin. This must be done by Monday January 30th, 2012. Work will begin upon receipt of payment. All wire transfer information will be provided to the owner's financial institution. This institution must contact Holton, Inc. directly.

All material is guaranteed to be as specified. All work to be completed in a workmanlike manner according to standard practice. Any alterations or deviations from above specifications involving extra costs will be executed upon written orders and will become an extra charge over and above the estimate. All agreements are contingent upon strikes, accidents or delays beyond our control. The owner is to carry fire, tornado and other necessary insurance.

Authorized Signature: [Signature] Date: January 28, 2012
Krzysztof Holton

Note: This proposal may be withdrawn by us if not accepted within 30 days.

ACCEPTANCE OF PROPOSAL - The above prices, specifications and conditions are satisfactory and are hereby accepted. Retain one copy for your records. Sign and return one copy.

You authorized to do the work as specified. Date of Acceptance: 2-2-2012

Signature: [Signature]

Signature: _____

2 (A)

MAY-3-2012 10:37 FROM:

TO: 18567576099
352 748 6428

P.2
P.4


Feb 02 2012 11:42AM SLEEP INN AND SUITES

To: All Utility Service Providers

Contractors: Holton, Inc.
3259 Lyntz Road
Lordsburg, Ohio 44131
Phone: (330) 824-2865

I, Slave Stefanovic, owner/agent of said property located at
1366 North Tool Ave, Warren, Ohio, Trumbull County, have retained the services of
Holton, Inc. to raze the structures at the address listed above and grant them the authority
to disconnect the utilities that provide service to this address.

Sincerely,


Slave Stefanovic

Date: 2-2-2012

Slave Stefanovic

1 (B)



Engineering, Planning & Building Department

City of Warren

Christopher A. Taneyhill
State of Ohio
Board of Building Standards
Certified Building Official

540 Laird Ave., S.E. • Warren, Ohio 44484
Phone: (330) 841-2617 • Fax: (330) 841-2614
www.warren.org

April 10, 2012

To: Enzo C. Cantalamessa, Director of Service-Safety

From: Christopher A. Taneyhill, Chief Building Official

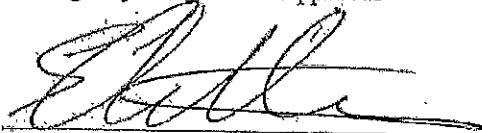
Mr. Cantalamessa,

Please be advised that the single family structure located at 1300 North Tod Avenue needs to be demolished as soon as possible due to the unsafe conditions that currently exist. It is the recommendation of the Building Official that this structure be declared an emergency case as described by ordinance. The structure does present an immediate hazard to the immediate neighbors and any responding emergency personnel. Thank you in advance for your consideration in this matter. Community Development Block Grant funds could be a source of funding for the demolition.

Enclosed is a proposal from Holton Inc. for the "emergency" removal which was signed by the property owner. Unfortunately after speaking with the owner today, he agrees that the home is in an unsafe condition and needs demolished; however the owner is claiming he does not have the funds to send to Holton Inc. for the commencement of demolition.

1323.07 EMERGENCY CASES. In cases where it reasonably appears that there is immediate danger to the life or safety of any person unless a dangerous building as defined in this chapter is immediately repaired, vacated or demolished, the Building Inspector shall report such facts to the Director of Public Service and Safety and the Director shall cause the immediate repair, vacation or demolition of such dangerous building. The costs of such emergency repair, vacation or demolition of such dangerous building shall be collected in the same manner as provided in Section 1323.02(1). (Ord 10082/90. Passed 1-24-90.)

Emergency Demolition Approval


Enzo C. Cantalamessa, Director of Service-Safety

4/12/12
Date

2



SHIP F.O.B. DESTINATION TO:
 COMMUNITY DEVELOPMENT
 418 MAIN AVE SW
 WARREN OH 44481-1060

CHECK BOX IF EMERGENCY PURCHASE:



**CITY OF
 WARREN, OHIO**

391 MAHONING AVE., N.W.
 WARREN, OHIO 44483
 (350) 841-2584

PURCHASE ORDER
 NO. 12-0002461-001
 DATE: 4/27/12

THIS NUMBER TOGETHER WITH
 DEPT. PART NUMBER AND
 SPECIFICATION NUMBER, MUST
 APPEAR ON ALL INVOICES,
 PACKAGES AND PACKING SLIPS.

11829

V
 E
 N
 D
 O
 R
 HOLTON INC
 3259 LYNTZ TOWNLINE ROAD
 LORDSTOWN OH 44481-9582

SEND INVOICES TO:
 DEPT.

SHIP DATE:

ITEM	QUANTITY	UNIT MEASURE	DESCRIPTION	UNIT PRICE	TOTAL
			***** EMERGENCY PURCHASE ORDER DO NOT MAIL *****		
	1.0000	EA	Emergency Demolition of structure located at: 1300 Tod Ave NW, Warren, OH 214.351 531.700 11 7	5500.00	5500.00
TOTAL					5500.00

#5

CERTIFICATE OF EXEMPTION

This order is exempt from Federal Excise Tax under Title, 26, USCA, and from Ohio Sales Tax under Sec., 5739.02 (B) (1).

IMPORTANT NOTICE: Unless you notify the buyer and obtain a formal revision from him prior to shipment, the prices on this order are maximums that will be paid against invoices for material or services supplied.

All shipments must be accompanied by packing slip showing order number, part or specification number, quantity and brief description of goods.

MICHAEL D KEYS

Department Head acknowledges and approves above purchase(s).

AUDITOR'S CERTIFICATE

I hereby certify that the amount of money required to meet the payments called for in the above order has been lawfully appropriated for such purposes and is in the treasury or in the process of collection to the credit of the appropriate fund free from any previous encumbrances.

By: [Signature] City Auditor
 Approved: [Signature] Administrative Coordinator
 By: [Signature] Dir.

PURCHASING DEPT COPY

**PLAINTIFF'S
 EXHIBIT**
 F



*Engineering, Planning
& Building Department*
City of Warren

540 Laird Ave., S.E. • Warren, Ohio 44484
Phone: (330) 841-2562 • Fax: (330) 841-2614

William Douglas Franklin
Mayor

Enzo C. Cantalamessa
Director of Service-Safety

Paul Makosky
Department Director
Of Engineering, Planning
& Building

INVOICE FOR DEMOLITION SERVICES

INVOICE NO. 121124

Please remit to: Engineering, Planning & Building Department
540 Laird Avenue, S.E.
Warren, Ohio 44484
Attention: Chris Taneyhill

Please make check payable to: City of Warren

PAYMENT DUE DATE: December 21, 2012

TO: Ljubica and Slavoljub Stefanovic / Euro-American Finance Network, Inc.
6624 Woody Court
Leesburg, Florida 34748

PROJECT: Demolition of three structures located on: **PARCEL ID NO:** 39-005996
1300 Tod Avenue N.W. **LOT #** 100A
Warren, Ohio 44485

Description: Demolish one story residential type structure and two utility building type structures. Filled, graded and seeded affected areas.

There is due at this time for demolition on the above project, the sum of: \$5500.00

TOTAL AMOUNT DUE UPON RECEIPT: \$5500.00

Failure to make full payment by the above due date will result in legal action to collect the cost of the demolition from the owner or other responsible party.

"This Agency is an Equal Provider of Services and an Equal Opportunity Employer - C.R.A. 1964"



ORIGINAL

DATE 5/23/2012
REMIT ADDRESS
IF DIFFERENT

PAID
JUN 16 2012

FORGED USE ONLY	
HRD/ACTIVITY NUMBER	2426
DATE PAID	06-06-12
CHECK #	45735
DRAW/DOWN DATE	06-08-12
VOUCHER #	5436058

11829
Vendor# Holton Inc
Name

ACCOUNT NUMBER	Requisition or P.O. #	Invoice #	Project # or Contract	PO Complete Y/N	Amount
10,500.00	12-2461	12-3157	11-7	Y	\$5,500.00
214					
351					
531					
700					

Less Discounts/Adj.

TOTAL VOUCHER \$5,500.00

Examined and Approved As A Valid Claim
For Items Requested & Received Or Services
Rendered & Received By The City Of Newark

Examine And Approved As A Valid Claim
And That The Purchasing Policies & Procedures
Have Been Complied With For This Claim

Examined And Approved As Appropriated
And In The Treasury For Payment

[Signature]
Department Head or Elected Official

[Signature]
Safety Service Director

[Signature]
City Auditor



Engineering, Planning & Building Department

City of Warren

540 Laird Ave., S.E. • Warren, Ohio 44484
Phone: (330) 841-2562 • Fax: (330) 841-2614

Michael J. O'Brien
Mayor

William Douglas Franklin
Director of Service-Safety

William Totton
Department Director
of Engineering, Planning
& Building

MEMORANDUM TO: Community Development

DATE: May 23, 2012

ATTENTION: Lori Lemasters, Accountant

FROM: Harry L. Krjner
City Building Inspector

PURCHASE ORDER NO: 12-0002461

CONTRACTOR: Holton, Inc.

CONTRACT: Residential Emergency Demolition

TOTAL CONTRACT AMOUNT:
\$5,500.00

Final Payment: \$5,500.00

Please except this memorandum as final release for the attached purchase order in the amount of (\$5,500.00) Five thousand- five hundred dollars, 00/100.

All work has been inspected and approved by the Building Inspector.

Enclosures: Invoice #12-3157

Harry L. Krjner, City Building Inspector