

**NOTICE OF IN REM FORECLOSURE OF TAX LIEN TITLES
SUPERIOR COURT OF NEW JERSEY
BURLINGTON COUNTY
CHANCERY DIVISION
DOCKET NO. F-01431-21**

DELANCO TOWNSHIP
A Municipal Corporation of the State of New Jersey

TAKE NOTICE that an action In Rem has been commenced in the Superior Court of New Jersey, by the filing of a Complaint on March 19, 2021, to foreclose and forever bar any and all rights of redemption of the parcels of land described in the Tax Foreclosure List below from plaintiff's tax lien titles.

1. The action is brought against the land only, and no person judgment may be entered.
2. Any person desiring to protect a right, title or interest in the described land and/or parcel thereof by redemption or to contest plaintiff's right to foreclose, must do so by paying the amount required to redeem as set forth below, plus interest to the date of redemption, and such costs as the court may allow, prior to the entry of judgment therein, or by filing an answer to the complaint setting forth the defendant's defense, within forty-five (45) days after the date of publication of this notice.
3. In the event of failure to redeem or answer by any person having the right to redeem or answer, such person shall be forever barred and foreclosed of all right, title and interest and equity of redemption in and to the parcels of land described in the following tax foreclosure list.
4. The following is a copy of the tax foreclosure list showing the lands against which this action is brought.

Sch.#	Block	Lot	Address	Owner	Tax Sale Amount	Additional Charges Subsequent to Tax Sale	Current Amount to Redeem	Approximate Amount to Redeem in Six Months	Date of Tax Sale	Tax Sale Certificate	Date of Recording	Recording Information of Tax Cert.
1	500	1.01	2224 Burlington Ave.	Gres and Kaluzny Land Develop., LLC	\$265.47	\$4,391.89	\$4,657.36	\$5,036.77	10/18/2012	12-00006	7/21/2014	Instrument Number 5076188, Book OR13133, Page 2708

Stephen E. Raymond, Esquire
Raymond Coleman Heinold, LLP
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Moorestown, New Jersey 08057

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Attorney for Plaintiff, Delanco Township

<p>DELANCO TOWNSHIP, a Municipal Corporation of the State of New Jersey,</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>BLOCK 500, Lot 1.01, assessed to Gres and Kaluzny Land Develop., LLC</p> <p style="text-align: right;">Defendant.</p>	<p>SUPERIOR COURT OF NEW JERSEY BURLINGTON COUNTY CHANCERY DIVISION</p> <p>Docket No. SWC-F-001431-21</p> <p>(A Civil Action)</p> <p>COMPLAINT <i>IN REM</i></p>
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Plaintiff, Delanco Township, in the County of Burlington, a Municipal Corporation in the State on New Jersey says that:

PARTIES

1. Plaintiff, Delanco Township, is a municipal corporation in the County of Burlington, State of New Jersey with its principal place of business being: 770 Coopertown Road, Delanco, New Jersey 08075.

2. BLOCK 500, Lot 1.01, is a parcel of real property situated in Delanco Township, assessed to Gres and Kaluzny Develop., LLC.

COUNT I

1. By a Resolution 2020-132 adopted by the Township Committee of Delanco Township, in the County of Burlington, the governing body of Delanco Township, and pursuant to N.J.S.A. 54:5-104.29 to N.J.S.A. 54:5-104.71, as amended, and the Rules of the Court governing

such practice and procedure, Plaintiff determined to foreclose, In Rem, the Tax Sale Certificates particularly mentioned and described in the Tax Foreclosure List annexed to said Resolution, a copy of which said Resolution and Tax Foreclosure List are attached hereto and made a part hereof. A copy of said Resolution 2020-132 and Tax Foreclosure List is attached hereto as **Exhibit A**.

2. Pursuant to N.J.S.A. 54:5-104.34, more than six (6) months have expired from the date of the sale out of which each of the above-mentioned tax sale certificates arose.

3. All or any portion of the general land taxes levied and assessed against the land covered by each of the above-mentioned tax sale certificates for the 21 months next proceeding the commencement of the action, other than those subject to payment by installments authorized by resolution adopted pursuant to N.J.S.A. 54:4-65, remain unpaid.

4. Each of the Tax Sale Certificates and the land therein described which are the subject matter of this foreclosure are listed in the Tax Foreclosure List annexed hereto and made a part hereof and is designated as Schedule Number 1.

5. The name of the person or persons who, by the public records appear to be the owners of the land to be affected by this Tax Foreclosure proceeding, more particularly set forth in the attached Tax Foreclosure List and the book and page or date and instrument number of the instrument by which each such person acquired title is set forth hereunder, opposite the respective schedule number referred to in Paragraph 4 above. For further identification, there are also set forth opposite each schedule number the identifying serial number of the Certificate of the Tax Sale, the date of the recording of the same in the office of the Clerk of Burlington County, and the instrument or book and page number where same is recorded, and each Certificate set forth herein shall be deemed to be a separate cause of action.

Schedule No.	Tax Sale Certificate No.	Date of Tax Sale	Date of Recording Tax Sale Certificate	Book & Page in Burlington County Clerk's Office for Tax Sale Certificate	Record Owner	Deed Date	Date Recorded	Instrument Number in Burlington County Clerk's Office for Deed
1	12-00006	10/18/2012	07/21/2014	Book 13133, Page 2708	Gres and Kaluzny Land Develop., LLC	08/14/2003	09/25/2003	Book 6109, Page 210

WHEREFORE, Plaintiff demands judgment:

a. That Notice of the Foreclosure in the form prescribed by said statute and the Rules of the Court, be published once in a newspaper and circulated in Delanco Township, and that any person desiring a right, title or interest in the above-described lands or any parcel thereof, by redemption or to contest Plaintiff's right to foreclose, be required to do so by paying the amount required to redeem, plus interest to the date of redemption, and such costs as the Court may allow, prior to the entry of a Judgment herein, or by filing an Answer to this Complaint setting forth Defendant's defense within 45 days after the date of publication.

b. That in the event of failure to redeem or answer by any person having the right to redeem or answer such person shall be forever barred and foreclosed of all his rights, title and interest and equity of redemption in the lands and premises hereinabove described.

c. That a Judgment may be entered by this Court giving full and complete relief in accordance with the purpose and provisions of the aforesaid act, and in accordance with any other statutory authority and with the practice of the Court, to bar the right of redemption and to foreclose all prior or subsequent alienations and descents of the lands aforesaid and encumbrances thereon (except that this action will not extinguish current easements of record and/or claims made by the

State of New Jersey, including but not limited to Tideland claims), and to order and adjudge an absolute and indefeasible estate of inheritance in fee simple in the lands hereinabove described to be vested in the Plaintiff.

COUNT II

1. By virtue of the entry of judgment in Count I, Plaintiff is entitled to possession of premises located in Delanco Township, County of Burlington, and State of New Jersey, more particularly described in the First Count. Said claims are joined in one action, pursuant to R. 4:27-

2.

2. Defendants have at all times since that date deprived the plaintiff of possession of said premises.

WHEREFORE, Plaintiff, or its assigns, demands Judgment:

a. That the said defendants and all persons claiming by, through, or under them by directed to deliver up to the plaintiff the possession of the said lands and premises, together with all deeds, papers, and writings in their custody and power relating to or concerning the said premises or any part thereof.

b. For costs.

RAYMOND COLEMAN HEINOLD, LLP
Attorney on behalf of Plaintiff, Township of Delanco

Dated: March 18, 2021

By: /s/ Stephen E. Raymond
Stephen E. Raymond, Esquire

CERTIFICATION

I, the undersigned attorney at law of the State of New Jersey, associate of the law firm of Raymond Coleman Heinold, LLP, attorneys for the plaintiff in the within action, and the person actually entrusted with the conduct and management of the case, do aver:

Prior to the filing of this tax foreclosure complaint, I have received and reviewed a title search of the public record (dated December 10, 2020) for the purpose of identifying any lienholder or other persons and entities with an interest in the property that is subject to the within foreclosure.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

RAYMOND COLEMAN HEINOLD, LLP
Attorney on behalf of Plaintiff, Township of Delanco

Dated: March 18, 2021

By: /s/ Stephen E. Raymond
Stephen E. Raymond, Esquire

RULE 4:5-1 CERTIFICATION

I hereby certify pursuant to Rule 4:5-1 that the matter in controversy is not the subject of any pending action or arbitration proceeding, nor is any other action or arbitration proceeding contemplated. To the best of my knowledge at this time, I further certify that there are no other parties who should be joined in this action. I certify that the foregoing statements made by me are true, I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

RAYMOND COLEMAN HEINOLD, LLP
Attorney on behalf of Plaintiff, Township of Delanco


Dated: March 18, 2021

By: /S/ Stephen E. Raymond
Stephen E. Raymond, Esquire

STATE OF NEW JERSEY :
 : ss.
COUNTY OF BURLINGTON :


JENNIFER DELLAVALLE, CTC, being of full age and duly sworn according to law, upon my oath, depose and say:

1. I am the Tax Collector of the Township of Delanco, the plaintiff herein.
2. I have read the foregoing Complaint and know the contents thereof.
3. The Tax Foreclosure List contained in and attached to the Complaint was prepared by me or under my supervision.
4. The matters and things stated in the Complaint that were taken from the records of my office are true, and the other matters therein stated true to the best of my knowledge, information and belief.



 Jennifer DellaValle, CTC
 Tax Collector, Township of Delanco
 County of Burlington, State of New Jersey

Sworn and subscribed to before me on this 24 day of ~~September~~, 2021
February



 Notary Public

BEVERLY G RUSSELL
NOTARY PUBLIC
STATE OF NEW JERSEY
ID # 50027331
MY COMMISSION EXPIRES NOV. 17, 2025

CERTIFICATION

I, Jennifer DellaValle, CTC, Tax Collector of the Township of Delanco, hereby certify that the attached is a list of tax sale certificates held by the Township of Delanco, and the lands affected by said certificates, together with the amounts due, to March 1, 2021 and September 1, 2021. on said tax sale certificates and for subsequent municipal liens, with interest, penalties, and costs, including the amount to redeem, as appears on the records of the tax collector's office, and the ownership of said lands as appears on the last tax duplicate of the Township of Delanco.

I further certify that more than six (6) months has expired from the date of the tax sales out of which each of said certificates arose, and that no part of any general land taxes, levied and assessed for the 21 months next proceeding the date hereof against the land covered by each of said certificates, has been paid

Dated: February 24, 2021

Beverly G Russell

By: *J. DellaValle*
Jennifer DellaValle, CTC
Tax Collector
Township of Delanco

**BEVERLY G RUSSELL
NOTARY PUBLIC
STATE OF NEW JERSEY
ID # 50027331
MY COMMISSION EXPIRES NOV. 17, 2025**

Exhibit A

RESOLUTION NO. 2020-132

RESOLUTION OF THE TOWNSHIP OF DELANCO, IN THE COUNTY OF BURLINGTON, STATE OF NEW JERSEY AUTHORIZING IN REM FORECLOSURE OF A TAX SALE CERTIFICATE FOR BLOCK 500, LOT 1.01 HELD BY THE TOWNSHIP OF DELANCO

WHEREAS, the Tax Collector of the Township of Delanco has prepared and presented to the Township Committee an In Rem Foreclosure List. The Township of Delanco is the holder of the tax sale certificate as listed below; and

WHEREAS, there is a need to foreclose this certificate in order to return this property to the active tax rolls of the Township of Delanco; and

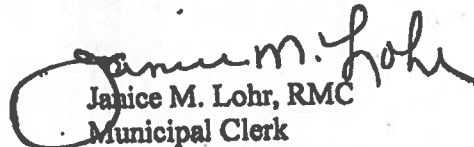
WHEREAS, N.J.S.A. 54:5-104.35 provides in pertinent part that the Governing Body may by Resolution, foreclose any of the tax sale certificates held by it, by summary proceedings In Rem as provided in the In Rem Foreclosure Act [L.1948, c.96];

NOW THEREFORE BE IT RESOLVED, by the Township Committee of the Township of Delanco, in the County of Burlington and the State of New Jersey, that the Solicitor is hereby authorized to foreclose the property schedule as noted below on the In Rem Foreclosure List, a copy of which is attached hereto and made part hereof:

Schd #	Tax Sale Certificate	Tax Sale Date	Block and Lot	Address
1	12-00006	10/12/2012	Block 500, Lot 1.01	2224 Burlington Ave.

NOW, THEREFORE, BE IT RESOLVED, by the Township Committee of the Township of Delanco, in the County of Burlington, and State of New Jersey that it is determined that the Township foreclose, by summary proceedings *In Rem* as provided in the *In Rem* Foreclosure Act (1948), the tax sale certificates held by it, as listed on the attached Tax Foreclosure List.

The above entitled Resolution was adopted at a meeting of the Township Committee of the Township of Delanco at the regularly scheduled meeting on November 16, 2020 at the Municipal Building, 770 Coopertown Road, Delanco, New Jersey at 7:00 PM.


 Janice M. Lohr, RMC
 Municipal Clerk

Tax Cert. #	Date of Tax Sale	Recording Info of Tax Cert.	Tax Sale Amt	Amt of Tax Liens Accruing After Tax Sale (including interest, penalties and costs)	Amt to Redeem	Name of Owner on Last Tax Duplicate
12-00006	10/18/2018	Instrument No. 5076188, Book OR13133, Page 2708	\$265.47	\$4,172.37	\$4,437.84	Gres and Kaluzny Land Develop., LLC

Exhibit B

Township of Delanco - Tax Sale Foreclosure List

Sch. #	Block	Lot	Address	Owner	Tax Sale Amount	Additional Charges Subsequent to Tax Sale	Current Amount to Redeem	Approximate Amount to Redeem in Six Months	Date of Tax Sale	Tax Sale Certificate	Date of Recording	Recording Information of Tax Cert.
1	500	1.01	2224 Burlington Ave.	Gres and Kalutny Land Develop., LLC	\$265 47	\$4,391.89	\$4,657.36	\$5,026.77 (SEE BELOW FOR BREAKDOWN)	10/18/2012	12-00006	7/21/2014	Instrument Number: 5076188, Book 0813133, Page 2708

Tax Sale Certificate
 No. 12-00006
 Date of Sale: 10/18/2012
 Date of Recording: 7/21/2014
 Amount: \$4,657.36
 Total Tax Sale Amount: \$5,026.77

Foreclosure Case Information Statement

Case Details: BURLINGTON | General Equity Docket # 001431-21

Case Caption: TOWNSHIP OF DELANCO VS BLK 500 **Case Type:** IN REM TAX FORECLOSURE
LOT 1.01
Case Initiation date: 03/19/2021 **Document Type:** Complaint

Plaintiff(s)

(1)

Name: Township of Delanco **Party Type:** Business
Address Line 1: 770 Coopertown Road **Corporation Type:**
Address Line 2:
City: Delanco **State:** NJ **Zip:** 08075 **Phone:** 8564610561
Attorney Name: STEPHEN E RAYMOND **Email Address:**
SERAYMOND@RCLAWNJ.COM

Property(s)

(1)

Property Address: 2224 Burlington Avenue **County:** BURLINGTON
Municipality: DELANCO TWP **Block:** 500 **Lot:** 1.01
Zip: 08075

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

03/19/2021
Dated

/s/ STEPHEN E RAYMOND
Signed