IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
SOUTHERN DIVISION

MONTGOMERY COUNTY, MARYLAND, on behalf of itself and all others similarly situated, Plaintiffs, vs. FEDERAL NATIONAL MORTGAGE ASSOCIATION, a corporation; FEDERAL HOME LOAN MORTGAGE CORPORATION, a corporation; FEDERAL HOUSING FINANCE AGENCY, a federal agency, as conservator for FEDERAL NATIONAL MORTGAGE ASSOCIATION and FEDERAL HOME LOAN MORTGAGE CORPORATION, Defendants.	)	CIVIL ACTION FILE NO. _____ **CLASS ACTION COMPLAINT** **JURY TRIAL DEMANDED**

NOW COMES Plaintiff Montgomery County, Maryland, for itself and on behalf of all Maryland counties and their tax collectors, Clerks of Court, or other officers authorized and obligated to collect the subject taxes ("Plaintiffs"), and complain of Defendants as follows:

PARTIES

1.

Plaintiff Montgomery County is a duly organized corporate body of the State

of Maryland, and is fully authorized and empowered to bring this action pursuant to Md. Ann. Code Art. 25A, § 1, which provides that the county "may sue and be sued," in addition to Md. Code Ann. § 14-865(a)(2), which provides for "the attorney for the county or municipal corporation to institute an action against the person responsible for the tax." Montgomery County's Director of the Department of Finance is the county official designated to collect certain of the taxes which are the subject of this action; the Clerk of Court in Montgomery County is the official designated to collect other of the taxes which are the subject of this action.

2.

Defendant Federal National Mortgage Association ("Fannie Mae") is a private, for-profit, corporation with its principal place of business in Washington, D.C.

3.

Defendant Federal Home Loan Mortgage Corporation ("Freddie Mac") is a private, for-profit corporation with its principal place of business in McLean, Virginia.

4.

Defendant Federal Housing Finance Agency ("FHFA") is an agency of the United States with its principal place of business in Washington, D.C.

JURISDICTION AND VENUE

5.

This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1332 because the parties are citizens of different states and the amount in controversy exceeds $75,000.00, exclusive of interests and costs.

6.

This Court also has jurisdiction over this action under 12 U.S.C. § 1452(f)(2) ("all civil actions to which the [Freddie Mac] is a party shall be deemed to arise under the laws of the United States, and the district courts of the United States shall have original jurisdiction of all such actions, without regard to amount or value").

7.

Plaintiff Montgomery County is located in this judicial district.

8.

Defendants do business in this judicial district.

9.

Plaintiffs' claims arise out of Defendants' activities in this judicial district.

10.

Venue is proper in this district.

CLASS ACTION ALLEGATIONS

11.

Plaintiff Montgomery County brings this action on its own behalf and, pursuant to Federal Rule of Civil Procedure 23, on behalf of a class of persons defined as any Maryland county and its designated county collector, if any, and county Clerk of Court, where recordation taxes and transfer taxes are imposed under Md. Code Ann., Tax-Prop. §§ 12-101, 13-201, -202, -203, -401, -402, -404 and -502, and, if applicable, where that county has imposed a county specific transfer tax, such as Montgomery County Code §§ 52-19 *et seq* (collectively "Maryland Transfer Taxes"), and where Defendants Fannie Mae and/or Freddie Mac have been party to any transaction, deed, instrument, or other writing by which title to, or an interest in, any lands, tenements, or other realty is transferred, and where Defendants Fannie Mae and/or Freddie Mac have not paid and/or claimed they are exempt from paying all or any part of the Maryland Transfer Taxes.

12.

The total number of class members is believed to include 18 Maryland counties and their 18 respective designated and authorized county collectors and 18 Clerks of Court.

13.

The members of the class are so numerous that joinder of all members is impracticable.

14.

The questions of law and fact common to the class include (a) whether Defendants Fannie Mae and Freddie Mac qualify for the exemptions they claim from the Maryland Transfer Taxes; (b) whether the real property exception to the claimed exemptions is applicable; and (c) whether the claimed exemptions are an unconstitutional burden on the right of state and local governments to tax private corporations.

15.

The claims of Plaintiffs and the absent class members have a common origin and share a common basis.

16.

Plaintiffs' claims and the claims of the absent class members originate from the same practice by Defendants Fannie Mae and Freddie Mac, and Defendants act in the same way toward Plaintiffs and the members of the class.

17.

Plaintiffs and each class member have been the victims of Defendants' actions.

18.

Plaintiffs' claims are typical of the claims of absent class members.

19.

If brought individually, the claim of each class member would necessarily require proof of the same material and substantive facts and seek the same remedies as Plaintiffs' claim.

20.

Plaintiffs are willing and prepared to serve the Court and the proposed class in a representative capacity.

21.

Plaintiffs will fairly and adequately protect the interest of the class and have no interest adverse to, or which directly and irrevocably conflicts with, the interests of other members of the class.

22.

A class action is superior to other available methods for the fair and efficient adjudication of this controversy because individual claims by the class members are impractical as the costs of prosecution may exceed what any class member has at stake.

23.

To the extent there is a separate action already filed by a class member, members may opt out of this class action and pursue their separate claims, as may any class member who so chooses to opt out after receiving notice.

PLAINTIFFS' CLAIMS

24.

Under Md. Code Ann., Tax-Prop. §§ 12-101, 13-201, -202, -203, -402, -404 and -502, recordation and transfer taxes are imposed upon written instruments that convey title to, or an interest in, real property in Maryland. In addition, under §13-402.1 certain counties impose their own transfer taxes such as Montgomery County, Local Laws §§ 52-20 and 50-21. Certain counties are further empowered to collect transfer taxes on improved nonresidential property, unimproved property, land assessed as farmland, rezoned property, condominium property, cooperative housing, nonresidential leasehold interest in real property. These taxes are referred to collectively herein as the "Maryland Transfer Taxes".

25.

Defendants Fannie Mae and Freddie Mac have been party to written instruments that convey title to, or an interest in, real property in Maryland, and in

Montgomery County, and in the jurisdictions of each member of the putative class, but have not paid the Maryland Transfer Taxes.

26.

Under the statutes and local laws comprising the Maryland Transfer Taxes, Fannie Mae and Freddie Mac were required to pay Maryland Transfer Taxes in conjunction with written instruments that convey title to, or an interest in, real property whether or not they recorded the deeds or other instruments evidencing the transactions.

NO FEDERAL OR STATE EXEMPTION IS APPLICABLE

27.

Defendants Fannie Mae and Freddie Mac have not paid the Maryland Transfer Taxes because they have claimed erroneously on the face of the documents they have recorded, or caused to be recorded, that the transaction is exempt from the Maryland Transfer Taxes on several grounds, none of which apply to the transactions at issue. An example of a deed recorded by or on behalf of Defendant Fannie Mae is attached as Exhibit A.

28.

Defendants sometimes claim the transaction is exempt because they are governmental entities or agencies and that, under Maryland law, governmental agencies or entities are exempt from paying the tax. However, that state law

exemption from the Maryland Transfer Taxes is inapplicable because Fannie and Freddie are no longer governmental entities or federal instrumentalities. Defendants Fannie Mae and Freddie Mac have both been federally chartered, private stock, publically traded corporations since at least March 31, 2003, and are presently listed for trading as Freddie Mac (OTC: FMCC) and Fannie Mae (common stock) (OTC BB: FNMA), and are not and have not been agencies, departments or instrumentalities of the United States for any time applicable to the claims made in this action. Therefore Defendants' claims of exemption under Maryland law are false and fail.

29.

Other times Defendants claim they are exempt pursuant to federal law. Specifically, Fannie and Freddie claim to be exempt under the general exemption language contained in their federal charters, 12 U.S.C. §1723a(c)(2) and 12 U.S.C. § 1452(e), respectively.[1] In fact, neither claimed exemption statute shields

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[1] Fannie Mae's charter reads, in pertinent part: "The corporation, including its franchise, capital, reserves, surplus, mortgages or other security holdings, and income, shall be exempt from all taxation now or hereafter imposed by any State, territory, possession, Commonwealth, or dependency of the United States, or by the District of Columbia, or by any county, municipality, or local taxing authority, except that any real property of the corporation shall be subject to State, territorial, county, municipal, or local taxation to the same extent as other real property is taxed." 12 U.S.C. § 1723a(c)(2).

Defendants from the obligation to pay the Maryland Transfer Taxes because, under the clear Supreme Court mandate contained in *United States v. Wells Fargo*, 485 U.S. 351 (1988), the "all taxation" language contained in the federal exemption statutes does not comprise excise taxes such as the Maryland Transfer Taxes, as a matter of law.

Alternatively, the plain language of the federal exemption statutes expressly excepts the real property of the Defendants from the taxation exemption. Because the Maryland Transfer Tax is indisputably triggered by and incidental to Defendants' ownership of real property, the real property exception to exemption provides a separate and alternative basis for holding that Defendants are not exempt from, and owe, the taxes levied by Maryland Transfer Taxes.

Moreover, Defendants' claimed exemption from the Maryland Transfer Taxes is an unconstitutional interference with the right of state and local governments to tax private corporations.

Freddie Mac's charter is substantially identical and states: "The Corporation, including its franchise, activities, capital, reserves, surplus, and income, shall be exempt from all taxation now or hereafter imposed by any territory, dependency, or possession of the United States or by any State, county, municipality, or local taxing authority, except that any real property of the Corporation shall be subject to State, territorial, county, municipal, or local taxation to the same extent according to its value as other real property is taxed." 12 U.S.C. § 1452(e)

30.

Thus, no valid exemption from the Maryland Transfer Taxes applies under state or federal law. Nevertheless, Defendants Fannie Mae and Freddie Mac have failed and refused to pay the Maryland Transfer Taxes as required by law. As a proximate result, Plaintiffs have been damaged. Among other things, Plaintiffs are entitled to the full Maryland Transfer Taxes that should have been paid for each and every written instrument to which any Defendant was a party that conveyed title to, or an interest, in real property within the applicable statutory period, and statutory interest for failure to pay the Maryland Transfer Taxes pursuant to Maryland statute and law.

31.

The claim by Defendants Fannie Mae and Freddie Mac that they are exempt from the Maryland Transfer Taxes was either negligent, intentional or intended to defraud and Plaintiffs are entitled to the penalties prescribed by Maryland statute and law.

32.

Defendant FHFA is the Conservator of Defendants Fannie Mae and Freddie Mac pursuant to the Housing and Recovery Act of 2008 ("HERA"), 12 U.S.C. §§ 4501 et seq. Under HERA, FHFA succeeded to all of Fannie Mae's and Freddie Mac's rights, titles, powers and privileges, and assumed the private status of those

entities, not the reverse. 12 U.S.C. 4617(b)(2)(A). As Conservator, FHFA stepped into the shoes of Fannie Mae and Freddie Mac and, to the extent that Defendant FHFA is responsible for the acts of Defendants Fannie Mae and Freddie Mac, Plaintiffs seek judgment against Defendant FHFA.

FIRST CLAIM FOR RELIEF: DECLARATORY JUDGMENT

33.

Plaintiffs hereby re-allege and incorporate each preceding and succeeding paragraph as though fully set forth herein.

34.

There is an actual controversy between Plaintiff and the proposed Class on the one hand, and Defendants on the other, in that Defendants continue to claim that they are exempt from the obligation to pay the Maryland Transfer Taxes and Plaintiffs assert Defendants are not exempt.

35.

It is in the public interest to have the rights of the parties with regards to the payment of the Maryland Transfer Taxes determined because the declaratory judgment will terminate and afford relief from uncertainty, insecurity and controversy giving rise to this proceeding.

36.

Pursuant to 28 U.S.C. § 2201, Plaintiffs seek to obtain a non-pecuniary benefit for the Plaintiffs and the proposed Class in the form of a declaratory judgment that the Defendants are not exempt from payment of the Maryland Transfer Taxes under state and/or federal law. Counsel for Plaintiffs and the proposed Class are entitled to recover their reasonable attorneys' fees and expenses as a result of the conferral of a non-pecuniary benefit on behalf of the proposed Class, and will seek an award of such fees and expenses at the appropriate time.

37.

Plaintiffs and the proposed Class are also entitled to further relief under 28 U.S.C. § 2202, including payment to them of the Maryland Transfer Taxes not paid by Defendants, together with any statutory penalties and interest. Such relief is necessary and proper to the declaratory relief sought.

38.

All conditions precedent to this cause of action have occurred, have been satisfied, or have been waived.

SECOND CLAIM FOR RELIEF: NON-PAYMENT OF TRANSFER TAXES DUE

39.

Plaintiffs hereby re-allege and incorporate each preceding and succeeding paragraph as though fully set forth herein.

40.

Defendants Fannie Mae and Freddie Mac have been party to thousands of real estate transactions in which title has been transferred in Maryland counties, such as the named Plaintiff herein, and have not paid the required Maryland Transfer Taxes.

41.

Defendants have claimed several exemptions under state and federal law, but none of those exemptions apply.

42.

Defendants Fannie Mae and Freddie Mac have failed and refused to pay the Maryland Transfer Taxes as required by Maryland law. As a proximate result, Plaintiffs and the Class have been damaged. Among other things, Plaintiffs and the Class are entitled to payment of all Maryland Transfer Taxes that should have been paid, and interest and penalties for failure to pay the Maryland Transfer Taxes pursuant to Maryland law. The amount of all Maryland Transfer Taxes that should have been paid plus the interest and penalties for failure to paid said taxes exceeds $75,000.00.

43.

The claim by Defendants Fannie Mae and Freddie Mac that they are exempt from the Maryland Transfer Taxes was negligent, intentional, wanton, and/or intended to defraud the Plaintiffs and the Class, and Plaintiffs and the Class are

entitled to any penalties and interest as prescribed under Maryland law.

WHEREFORE, Plaintiffs, on behalf of themselves and the absent class members, request the following relief, and pray for the following judgment in favor of Plaintiffs and the class against Defendants:

1. For a judgment declaring that Defendants are subject to the Maryland Transfer Taxes;
2. For an order certifying this case as a class action against Defendants and appointing the named Plaintiff and the undersigned counsel as Representative of the class and counsel for the class, respectively;
3. For judgment against Defendants and in favor of Plaintiffs on all claims asserted in this Complaint;
4. For an award to Plaintiffs of damages in an amount that exceeds $75,000.00 and to be determined by the trier of fact;
5. For an award to Plaintiffs of statutory interest and penalties;
6. For an award to Plaintiffs of their costs, prejudgment interest and attorney fees; and
7. For such other relief as is just and proper.

Plaintiffs hereby demand a trial by jury on all issues.

Respectfully submitted this 7th day of January, 2013

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Attorneys for Plaintiffs

JS 44 (Rev. 09/11)

CIVIL COVER SHEET

The JS 44 civil coversheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. *(SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)*

I. (a) PLAINTIFFS

Montgomery County, Maryland, on behalf of itself and all others similarly situated

(b) County of Residence of First Listed Plaintiff Montgomery County
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys *(Firm Name, Address, and Telephone Number)*
Andrew Bederman, Greenberg & Bederman, 1111 Bonifant St., Silver Spring MD 20910 301-589-2200 & Bruce M. Plaxen, Plaxen & Adler, PA 10632 Little Patuxent Pkway. #420, Columbia MD 21044 410-730-7737

DEFENDANTS

Federal National Mortgage Association; Federal Home Loan Mortgage Corporation; Federal Housing Finance Agency as conservator for Fed. Nat'l. Mortg. Ass'n. and Fed. Home Loan Mortg. Corp.

County of Residence of First Listed Defendant District of Columbia
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys *(If Known)*

II. BASIS OF JURISDICTION *(Place an "X" in One Box Only)*

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question *(U.S. Government Not a Party)*
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity *(Indicate Citizenship of Parties in Item III)*

III. CITIZENSHIP OF PRINCIPAL PARTIES *(Place an "X" in One Box for Plaintiff) and One Box for Defendant)* *(For Diversity Cases Only)*

	PTF	DEF		PTF	DEF
Citizen of This State	☐ 1	☐ 1	Incorporated *or* Principal Place of Business In This State	☐ 4	☐ 4
Citizen of Another State	☐ 2	☐ 2	Incorporated *and* Principal Place of Business In Another State	☐ 5	☐ 5
Citizen or Subject of a Foreign Country	☐ 3	☐ 3	Foreign Nation	☐ 6	☐ 6

IV. NATURE OF SUIT *(Place an "X" in One Box Only)*

CONTRACT
- ☐ 110 Insurance
- ☐ 120 Marine
- ☐ 130 Miller Act
- ☐ 140 Negotiable Instrument
- ☐ 150 Recovery of Overpayment & Enforcement of Judgment
- ☐ 151 Medicare Act
- ☐ 152 Recovery of Defaulted Student Loans (Excl. Veterans)
- ☐ 153 Recovery of Overpayment of Veteran's Benefits
- ☐ 160 Stockholders' Suits
- ☐ 190 Other Contract
- ☐ 195 Contract Product Liability
- ☐ 196 Franchise

REAL PROPERTY
- ☐ 210 Land Condemnation
- ☐ 220 Foreclosure
- ☐ 230 Rent Lease & Ejectment
- ☐ 240 Torts to Land
- ☐ 245 Tort Product Liability
- ☐ 290 All Other Real Property

TORTS

PERSONAL INJURY
- ☐ 310 Airplane
- ☐ 315 Airplane Product Liability
- ☐ 320 Assault, Libel & Slander
- ☐ 330 Federal Employers' Liability
- ☐ 340 Marine
- ☐ 345 Marine Product Liability
- ☐ 350 Motor Vehicle
- ☐ 355 Motor Vehicle Product Liability
- ☐ 360 Other Personal Injury
- ☐ 362 Personal Injury - Med. Malpractice

PERSONAL INJURY
- ☐ 365 Personal Injury - Product Liability
- ☐ 367 Health Care/ Pharmaceutical Personal Injury Product Liability
- ☐ 368 Asbestos Personal Injury Product Liability

PERSONAL PROPERTY
- ☐ 370 Other Fraud
- ☐ 371 Truth in Lending
- ☐ 380 Other Personal Property Damage
- ☐ 385 Property Damage Product Liability

CIVIL RIGHTS
- ☐ 440 Other Civil Rights
- ☐ 441 Voting
- ☐ 442 Employment
- ☐ 443 Housing/ Accommodations
- ☐ 445 Amer. w/Disabilities - Employment
- ☐ 446 Amer. w/Disabilities - Other
- ☐ 448 Education

PRISONER PETITIONS
- ☐ 510 Motions to Vacate Sentence

Habeas Corpus:
- ☐ 530 General
- ☐ 535 Death Penalty
- ☐ 540 Mandamus & Other
- ☐ 550 Civil Rights
- ☐ 555 Prison Condition
- ☐ 560 Civil Detainee - Conditions of Confinement

FORFEITURE/PENALTY
- ☐ 625 Drug Related Seizure of Property 21 USC 881
- ☐ 690 Other

LABOR
- ☐ 710 Fair Labor Standards Act
- ☐ 720 Labor/Mgmt. Relations
- ☐ 740 Railway Labor Act
- ☐ 751 Family and Medical Leave Act
- ☐ 790 Other Labor Litigation
- ☐ 791 Empl. Ret. Inc. Security Act

IMMIGRATION
- ☐ 462 Naturalization Application
- ☐ 463 Habeas Corpus - Alien Detainee (Prisoner Petition)
- ☐ 465 Other Immigration Actions

BANKRUPTCY
- ☐ 422 Appeal 28 USC 158
- ☐ 423 Withdrawal 28 USC 157

PROPERTY RIGHTS
- ☐ 820 Copyrights
- ☐ 830 Patent
- ☐ 840 Trademark

SOCIAL SECURITY
- ☐ 861 HIA (1395ff)
- ☐ 862 Black Lung (923)
- ☐ 863 DIWC/DIWW (405(g))
- ☐ 864 SSID Title XVI
- ☐ 865 RSI (405(g))

FEDERAL TAX SUITS
- ☐ 870 Taxes (U.S. Plaintiff or Defendant)
- ☐ 871 IRS—Third Party 26 USC 7609

OTHER STATUTES
- ☐ 375 False Claims Act
- ☐ 400 State Reapportionment
- ☐ 410 Antitrust
- ☐ 430 Banks and Banking
- ☐ 450 Commerce
- ☐ 460 Deportation
- ☐ 470 Racketeer Influenced and Corrupt Organizations
- ☐ 480 Consumer Credit
- ☐ 490 Cable/Sat TV
- ☐ 850 Securities/Commodities/ Exchange
- ☒ 890 Other Statutory Actions
- ☐ 891 Agricultural Acts
- ☐ 893 Environmental Matters
- ☐ 895 Freedom of Information Act
- ☐ 896 Arbitration
- ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision
- ☐ 950 Constitutionality of State Statutes

V. ORIGIN *(Place an "X" in One Box Only)*

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from another district *(specify)*
- ☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing *(Do not cite jurisdictional statutes unless diversity)*:
12 U.S.C. 1452(f)(2)

Brief description of cause:
Montgomery County seeks repayment of unpaid transfer taxes for itself and other counties

VII. REQUESTED IN COMPLAINT:

☑ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND $ > 75,001.00

CHECK YES only if demanded in complaint:
JURY DEMAND: ☑ Yes ☐ No

VIII. RELATED CASE(S) IF ANY *(See instructions)*:

JUDGE _____ DOCKET NUMBER _____

DATE: 01/07/2013

SIGNATURE OF ATTORNEY OF RECORD: /s/ Andrew E. Bederman

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

I. (a) Plaintiffs-Defendants. Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

II. Jurisdiction. The basis of jurisdiction is set forth under Rule 8(a), F.R.CP., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.

United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.

United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.

Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdicti on arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is aparty, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.

Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; federal question actions take precedence over diversity cases.)

III. Residence (citizenship) of Principal Parties. This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

IV. Nature of Suit. Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerks in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.

V. Origin. Place an "X" in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28U.S.C., Section 1441. When the petition for removal is granted, check this box.

Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.

Appeal to District Judge from Magistrate Judgment. (7) Check this box for an appeal from a magistrate judge's decision.

VI. Cause of Action. Report the civil statute directly related to the cause of action and give a brief description of the cause **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553
Brief Description: Unauthorized reception of cable service

VII. Requested in Complaint. Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.

Demand. In this space enter the dollar amount (in thousands of dollars) being demanded or indicate other demand such as a preliminary injunction.

Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

VIII. Related Cases. This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Maryland

Montgomery County, Maryland, on behalf of itself and all others similary situated,	)	
Plaintiff	)	
v.	)	Civil Action No.
Federal National Mortgage Company, et al.	)	
Defendant	)	

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Federal National Mortgage Association
3900 Wisconsin Ave., NW, Washington DC 20016
Serve: Judith C. Dunn; 3900 Wisconsin Ave., NW, Washington DC 20016

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Andrew E. Bederman, Esq.;
Greenberg & Bederman, 1111 Bonifant St., Silver Spring, MD 20910

Bruce M. Plaxen, Esq.;
Plaxen & Adler, P.A., 10632 Little Patuxent Parkway # 420,
Columbia, MD 21044

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____.

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____, a person of suitable age and discretion who resides there, on *(date)* _____, and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____, who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify)*:

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Maryland

Montgomery County, Maryland, on behalf of itself and all others similary situated,	)	
Plaintiff	)	
v.	)	Civil Action No.
Federal Home Loan Mortgage Corporation, et al.	)	
Defendant	)	

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Federal Home Loan Mortgage Corporation
8200 Jones Branch Dr., McLean, VA 22102
Serve: Alicia S. Myara; 8200 Jones Branch Dr., McLean, VA 22102

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Andrew E. Bederman, Esq.;
Greenberg & Bederman, 1111 Bonifant St., Silver Spring, MD 20910

Bruce M. Plaxen, Esq.;
Plaxen & Adler, P.A., 10632 Little Patuxent Parkway # 420,
Columbia, MD 21044

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

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This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____, a person of suitable age and discretion who resides there, on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

☐ I returned the summons unexecuted because _____ ; or

☐ Other *(specify)*:

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Maryland

Montgomery County, Maryland, on behalf of itself and all others similary situated, *Plaintiff* v. Federal Housing Finance Agency, et al. *Defendant*	)))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Federal Housing Finance Agency (a federal agency, as conservator for Federal National Mortgage Association and Federal Home Loan Mortgage Corporation)
400 7th St., SW, Washington, D.C. 20004

Serve: Alfred Pollard, 400 7th St., SW, Washington, D.C. 20004

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Andrew E. Bederman, Esq.;
Greenberg & Bederman, 1111 Bonifant St., Silver Spring, MD 20910

Bruce M. Plaxen, Esq.;
Plaxen & Adler, P.A., 10632 Little Patuxent Parkway # 420,
Columbia, MD 21044

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____, a person of suitable age and discretion who resides there, on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

☐ I returned the summons unexecuted because _____ ; or

☐ Other *(specify)*:

.

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

EXHIBIT A - COMPLAINT

41512 421

Consideration **$290,000.00**
TAX ID: **#04-00081164**
File: **#T-71390-11**
Assessed Value:
EXEMPT FROM TRANSFER TAXES PER 12 U.S. CODE SECTION 1452(e)
Title Insurer: **FIRST AMERICAN TITLE**

SPECIAL WARRANTY DEED

THIS DEED, made this 18th day of APRIL 2011, by and between **FANNIE MAE, A/K/A FEDERAL NATIONAL MORTGAGE ASSOCIATION,** a federally chartered corporation organized and existing under the laws of the United States of America, Grantor, **Louis K. Brandon**, Grantee, purchasing property known as **12124 GAYNOR ROAD, ROCKVILLE, MD 20852**

WITNESSETH, that in consideration of the sum of **TWO HUNDRED NINETY THOUSAND AND 00/100 DOLLARS ($290,000.00)** cash in hand paid and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the Grantor does grant and convey unto **Louis K. Brandon**, the Grantee, his/her/their successors and assigns, in Fee Simple, **AS Sole Owner,** any and all right, title and interest it may possess in and to all of that certain lot, piece or parcel of real property, together with all rights of way, easements, improvements, buildings and appurtenances, thereunto belonging, lying and being in the **COUNTY OF MONTGOMERY, STATE OF MARYLAND,** described as follows to wit:

2011 APR 27 AM 8:31
FILED
LORETTA E. KNIGHT
CLERK'S OFFICE
MONTGOMERY CO. MD

BEING KNOWN AND DESIGNATED AS LOT NUMBERED FOUR (4) IN BLOCK LETTERED "H" IN THE SUBDIVISION KNOWN AS "SECTION TWO, FRANKLIN PARK", AS PER PLAT THEREOF DULY RECORDED AMONG THE LAND RECORDS OF MONTGOMERY COUNTY, MARYLAND IN PLAT BOOK 50 AT PAGE 3940.

AND BEING THE SAME PROPERTY CONVEYED TO THE GRANTORS BY TRUSTEE'S DEED DATED JANUARY 20, 2011 AND RECORDED IN BOOK 41005, PAGE 067 FROM JOHN S. BURSON, SUBSTITUTE TRUSTEE, GRANTOR TO FEDERAL NATIONAL MORTGAGE ASSOCIATION, GRANTEE.

To Have and To Hold the said tract of ground and premises above described and mentioned, and hereby intended to be conveyed, together with the rights, privileges, appurtenances and advantages thereto belonging or appertaining unto and to the proper use and benefit of the said **Louis K. Brandon**, in Fee Simple.

And the said party of the first part hereby covenants that they/he/she has not done or suffered to be done any act, matter or thing whatsoever, to encumber the property hereby conveyed; that they/he/she will warrant specially the property hereby granted; and that they/he/she will execute such further assurances of the same as may be requisite.

MONTGOMERY COUNTY, MD
APPROVED BY
APR 26 2011

MO CIRCUIT COURT (Land Records) [MSA_CE 63-41469] LEK 41512, p. 0421. Printed 01/07/2016. Online 04/26/2011.

$ 828.00 RECORDATION TAX PAID
$ 1450.00 TRANSFER TAX PAID

20
20

IN WITNESS WHEREOF, the Grantor, **FEDERAL NATIONAL MORTGAGE ASSOCIATION** has on this 18th day of APRIL 2011 caused these presents to be signed by SHAPIRO & BURSON, LLP, its Attorney in Fact, pursuant to that certain Power of Attorney recorded **December 2, 2008 in Liber 36261, folio 212** among the Land Records of the **COUNTY OF MONTGOMERY, MARYLAND**. The undersigned Attorney in Fact has no actual knowledge or notice of the revocation or termination of the aforementioned Power of Attorney.

FEDERAL NATIONAL MORTGAGE ASSOCIATION
BY: SHAPIRO & BURSON, LLP, ATTORNEY-IN-FACT

BY: _____
Name: Heidi Kelly
Title: Authorized Agent

STATE OF MARYLAND
COUNTY OF MONTGOMERY

I, Corinne S. Haley, a Notary Public in and for the jurisdiction aforesaid, do hereby certify and acknowledge that on this 18th day of APRIL 2011 Heidi Kelly, authorized agent on behalf of Shapiro & Burson, LLP, attorney-in-fact for FEDERAL NATIONAL MORTGAGE ASSOCIATION, who is personally well known to me as the person named in capacity to execute the foregoing and annexed deed, bearing date on the 18th day of APRIL 2011 personally appeared before me in the said jurisdiction and by virtue of the power vested in him/her acknowledged the same to be the act and deed of FEDERAL NATIONAL MORTGAGE ASSOCIATION.

CORINNE S. HALEY
Notary Public State of Maryland

_____
Notary Public: Corinne S. Haley
My Commission Expires: 12-14-2013

GRANTEE ADDRESS: **12124 GAYNOR ROAD, ROCKVILLE, MD 20852**

THIS IS TO CERTIFY that the within Deed was prepared by, or under the supervision of the undersigned, an Attorney duly admitted to practice before the Court of Appeals of Maryland.

Attorney – Lorn Hinish

After recording return to:
LAKEFOREST TITLE & ESCROW
18310 Montgomery Village Ave.
Suite 220
Gaithersburg, MD 20879

41512 424

2011
MARYLAND
FORM

Certification of Exemption from Withholding Upon Disposition of Maryland Real Estate
Affidavit of Residence or Principal Residence

Based on the certification below, Transferor claims exemption from the tax withholding requirements of §10-912 of the Tax-General Article, Annotated Code of Maryland. Section 10-912 provides that certain tax payments must be withheld and paid when a deed or other instrument that effects a change in ownership of real property is presented for recordation. The requirements of §10-912 do not apply when a transferor provides a certification of Maryland residence or certification that the transferred property is the transferor's principal residence.

1. Transferor Information

Name of Transferor
FEDERAL NATIONAL MORTGAGE ASSOCIATION

2. Reasons for Exemption

Resident Status	☐ I, Transferor, am a resident of the State of Maryland. ☑ Transferor is a resident entity as defined in Code of Maryland Regulations (COMAR) 03.04.12.02B(11). I am an agent of Transferor, and I have authority to sign this document on Transferor's behalf.
Principal Residence	☐ Although I am no longer a resident of the State of Maryland, the Property is my principal residence as defined in IRC 121 and is recorded as such with the State Department of Assessments and Taxation.

Under penalty of perjury, I certify that I have examined this declaration and that, to the best of my knowledge, it is true, correct, and complete.

3a. Individual Transferors

Witness

Name

Signature

3b. Entity Transferors

Witness/Attest

FEDERAL NATIONAL MORTGAGE ASSOCIATION
Name of Entity

By

Name

Title

10-49

AFFIDAVIT OF GRANTEE AS
FIRST-TIME MARYLAND HOME BUYER

The undersigned states under oath and penalties of perjury that the following is true to the best of the knowledge, information, and belief of each individual:

1. The undersigned is the Grantee of residentially improved real property located at 12124 GAYNOR ROAD, ROCKVILLE, MD 20852, and being more particularly described as Lot 4, Block H, Section Two, Franklin Park, Tax ID Number 04-00081164, Montgomery County, Maryland.

2. The undersigned is a first-time Maryland home buyer (defined as an individual who has never owned in the state residential real property that has been the individual's principal place of residence) who will occupy the property as Grantee's principal residence.

LOUIS KEITH BRANDON Grantee

The undersigned states under oath and penalties of perjury that the following is true to the best of the knowledge, information, and belief of each individual:

1. The undersigned is the Grantee of residentially improved real property located at 12124 GAYNOR ROAD, ROCKVILLE, MD 20852, and being more particularly described as Lot 4, Block H, Section Two, Franklin Park, Tax ID Number 04-00081164, Montgomery County, Maryland.

2. The undersigned is a co-maker or guarantor of the purchase money mortgage or purchase money deed of trust as defined in §12-108(i) of the Tax Property Article on the property who will not occupy the property as Grantee's principal residence.

_____
Guarantor/co-maker

The above oath or affirmation was given under the penalties of perjury before me, a Notary Public in and for the State of Maryland, County of Montgomery, this 22nd day of April, 2011.

Notary Public
My Commission Expires: 9/30/2013

MARC T. MALAKOFF
NOTARY PUBLIC
MONTGOMERY COUNTY
MARYLAND
My Commission Expires Sept. 30, 2013

AFFIDAVIT OF PURCHASER REGARDING
EXEMPTION FROM RECORDATION TAX
(MONTGOMERY COUNTY)

After being duly sworn, the undersigned Purchaser/Grantee depose and say the following under oath pursuant to Montgomery County Code, Chapter 52, Section 52-16B (Taxation):

1. The undersigned is the Grantee of real property located at address:
   12124 GAYNOR ROAD
   ROCKVILLE, MD 20852

   being more particularly described as Lot/Unit/Parcel 4, Block H, Subdivision/Condominium Section Two, Franklin Park, Montgomery County, Maryland.

2. The Purchaser/Grantee hereby swears or affirms under the penalty of perjury that the property herein conveyed is intended to be used as my principal residence by actually occupying the residence for at least seven (7) of the next twelve (12) months immediately after the property is conveyed.

3. This Affidavit is being executed in order to obtain an exemption from the Recordation Tax payable to Montgomery County, Maryland, on the first $50,000.00 of consideration stated in an instrument of writing for residential improved owner-occupied real property pursuant to the aforesaid statute.

Purchaser/Grantee:

_____{SEAL} _____{SEAL}
LOUIS KEITH BRANDON

Subscribed and Sworn to this 22nd day of April, 2011.

_____
Notary Public

My commission expires: 9/30/2013

MARC T. MALAKOFF
NOTARY PUBLIC
MONTGOMERY COUNTY
MARYLAND
My Commission Expires Sept 30, 2013

41512 427

State of Maryland Land Instrument Intake Sheet

[ ] Baltimore City [X] County: Montgomery

Information provided is for the use of the Clerk's Office and State Department of Assessments and Taxation, and the County Finance Office only.

(Type or Print in Black Ink Only All Copies Must Be Legible)

1 Type(s) of Instruments ([ ] Check Box if Addendum Intake Form is Attached.)

1	Deed		Mortgage		Other		Other
2	Deed of Trust		Lease				

2 Conveyance Check Box

X	Improved Sale Arms-Length *[1]*		Unimproved Sale Arms-Length *[2]*		Multiple Arms Length *[3]*		Not an Arms-Length Sale *[9]*

3 Tax Exemptions (if Applicable) Cite or Explain Authority

Recordation	
State Transfer	
County Transfer	

4 Consideration and Tax Calculations

Consideration	Amount	Finance Office Use Only	
Purchase Price/Consideration	$ 290,000.00	Transfer and Recordation Tax Consideration	
Any New Mortgage	$ 232,000.00	Transfer Tax Consideration	$
Balance of Existing Mortgage	$	x ( ) % =	$
Other:	$	Less Exemption Amount -	$
		Total Transfer Tax =	$
Other:	$	Recordation Tax Consideration	$
		x ( ) per $500 =	$
Full Cash Value	$	TOTAL DUE	$

5 Fees

Amount of Fees	Doc. 1	Doc. 2	
Recording Charge	$ 20.00	$ 20.00	Agent:
Surcharge	$ 20.00	$ 20.00	Tax Bill:
State Recordation Tax	$ 828.00	$ 772.80	
State Transfer Tax	$ 0.00	$ 0.00	C.B. Credit:
County Transfer Tax	$ 1,450.00	$ 0.00	
Other	$	$	Ag. Tax/Other:
Other	$	$	

6 Description of Property

SDAT requires submission of all applicable information. A maximum of 40 characters will be indexed in accordance with the priority cited in Real Property Article Section 3-104(g)(3)(i).

District	Property Tax ID No.(1)	Grantor Liber/Folio	Map	Parcel No.	Var. LOG
	04-00081164	41005/67			[ ](5)

Subdivision Name	Lot (3a)	Block(3b)	Sect/AR(3c)	Plat Ref.	SqFt/Acreage(4)
Section Two, Franklin Park	4	H		50/3940	

Location/Address of Property Being Conveyed (2): 12124 GAYNOR ROAD, ROCKVILLE, MD 20852

Other Property Identifiers (if applicable): | Water Meter Account No.:

Residential [X] or Non-Residential [ ] | Fee Simple [X] or Ground Rent [ ] | Amount: $N/A

Partial Conveyance? [ ] Yes [X] No | Description/Amt. of SqFt/Acreage Transferred: N/A

If Partial Conveyance, List Improvements Conveyed: N/A

7 Transferred From

Doc. 1 – Grantor(s) Name(s)	Doc. 2 – Grantor(s) Name(s)
FEDERAL NATIONAL MORTGAGE CORPORATION	LOUIS KEITH BRANDON
Doc. 1 - Owner(s) of Record, if Different from Grantor(s)	Doc. 2 – Owner(s) of Record, if Different from Grantor(s)

8 Transferred To

Doc. 1 – Grantee(s) Name(s)	Doc. 2 – Grantee(s) Name(s)
LOUIS KEITH BRANDON	TRUSTEE

New Owner's (Grantee) Mailing Address: 12124 GAYNOR ROAD, ROCKVILLE, MD 20852

9 Other Names to Be Indexed

Doc. 1 – Additional Names to be Indexed (Optional)	Doc. 2 - Additional Names to be Indexed (Optional)
	AMERICAN INTERNET MORTGAGE, INC.

10 Contact/Mail Information

Instrument Submitted By or Contact Person

Name: Mark Malakoff

Firm: Lakeforest Title & Escrow Company, Inc.

Address: 18310 Montgomery Village Ave Suite 220 Gaithersburg, MD 20879

Phone: Telephone: 301-590-0500 Fax: 301-590-0486

[X] Return to Contact Person

[ ] Hold for Pickup

[ ] Return Address Provided

11 IMPORTANT: *BOTH* THE ORIGINAL DEED *AND* A PHOTOCOPY MUST ACCOMPANY EACH TRANSFER.

Assessment Information

[X] Yes [ ] No Will the property being conveyed be the grantee's principal residence?

[ ] Yes [X] No Does transfer include personal property? If yes, identify:

[X] Yes [ ] No Was property surveyed? If yes, attach copy of survey (if recorded, no copy required)

Assessment Use Only - Do Not Write Below This Line

[ ] Terminal Verification [ ] Agricultural Verification [ ] Whole [ ] Part [ ] Tran. Process Verification

Transfer Number: Date Received: Deed Reference: Assigned Property No.:

Year			Geo.	Map	Sub	Block
Land			Zoning	Grid	Plat	Lot
Buildings			Use	Parcel	Section	Occ. Cd.
Total			Town Cd.	Ex. St.	Ex. Cd.	

REMARKS:

MO CIRCUIT COURT (Land Records) [MSA CE 63-41469] LEK 41512, p. 0427. Printed 01/07/2013. Online 04/29/2011.