

IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF DESCHUTES

**DESCHUTES COUNTY, a political  
subdivision of the State of Oregon,**

**Plaintiff,**

**v.**

**MICHAEL AUSTIN ALVAREZ, ATP  
LLC., CHRISTOPHER BARTON,  
RICHARD A BATS II, RICHARD C  
BOUFFARD, DAVID G. BROWN,  
MONICA J. BROWN, CAMILLA  
BRUMITT, JAYNE E. CARROLL,  
TIFFANY KELL BRINTON, JAYNE  
ELIZABETH CARROLL, DAVID W.  
CRUSE, DWIGHT B. CUMMINS,  
ELDON D. CUMMINS, JAROD  
DEBERNARDI, AIMEE LYNN FARMER,  
JANICE P. HARDIN, AMANDA R.  
HARTER, RONALD E HARTER  
REVOCABLE LIVING TRUST, SCOTT  
A. HATER TRUSTEE RONALD E  
HARTER REVOCABLE LIVING  
TRUST, SCOTT HARTER, SCOTT A.  
HATER, DONNA LITEHISER, TRAVIS  
LITEHISER, ESTATE OF JAMES E.  
MCCASLIN, GARY EDMUNDS  
MILLER, DYLAN MURRAY, N H  
JEPSON INC., JOE R. OTTLINGER,  
STEVEN W. ROSE, ANDREW M. RUIZ,  
ERIN C. OSBERG, RICHARD H. RUTH,  
JOHN F. SANNA, WHITNEY E.  
SORENSEN, ESTATE OF DOROTHY L.  
STOCK, WOLFBUILD LLC., JAMES  
WESLEY WRIGHT II, and KIM E.  
YOUSEY.**

Case No.:

**COMPLAINT (ORS 312.060 Application  
for Judgment of Foreclosure of Tax Liens)**

**CLAIMS NOT SUBJECT TO  
MANDATORY ARBITRATION**

1  
2 **Defendants.**  
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5 Plaintiff, DESCHUTES COUNTY, through its attorney of record, Kimberly Riley,  
6 Deschutes County Sr. Assistant Legal Counsel, alleges as follows:

7 1. Plaintiff, Deschutes County, a political subdivision of the State of Oregon  
8 (“Plaintiff”), through its tax collector, is required to commence tax lien foreclosure proceedings  
9 pursuant to ORS 312.050.

10 2. Plaintiff has prepared a list of those real properties within Deschutes County that  
11 are subject to foreclosure for delinquent property taxes pursuant to ORS 312.030 (the “Tax  
12 Foreclosure List”). The Tax Foreclosure List contains the names of the persons appearing on the  
13 latest tax roll as the respective owners of the tax delinquent properties, a description of each such  
14 property as the same appears in the latest tax roll, the year or years for which taxes were  
15 delinquent on each property, together with the principal amount of the delinquent taxes of each  
16 year and the amount of accrued interest thereon through August 19, 2025. A certified true copy  
17 of the Tax Foreclosure List is attached as Exhibit “1” hereto.

18 3. On August 19, 2025, the Tax Foreclosure List was published in the Bend Bulletin,  
19 a newspaper of general circulation published in this County and designated by Order of the  
20 Board of County Commissioners as the newspaper in which the Tax Foreclosure List should be  
21 published.

22 4. Subsequent to Plaintiff’s preparation of the Tax Foreclosure List, but prior to the  
23 filing of this Complaint, Plaintiff accepted payment of delinquent taxes for several of the  
24 properties identified in the Tax Foreclosure List, thus rendering those properties ineligible for  
25 foreclosure under ORS 312.030. The properties rendered ineligible for foreclosure (the “Exempt  
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1 Properties”) are denoted via “strike-through” on the Tax Foreclosure List attached hereto as  
2 Exhibit “1”, and their owners of record have not been made defendants in this action.

3 5. The above-captioned defendants (the “Defendants”) are the current owners of  
4 properties identified on the Tax Foreclosure List for which, as of the date of filing of this  
5 Complaint, taxes are delinquent for more than three (3) years from the earliest date of such  
6 delinquency (the “Subject Properties”). Plaintiff’s lien of all such delinquent taxes against each  
7 of the Subject Properties has become subject to foreclosure under ORS 312.030. Defendants,  
8 and each and every other person owning, or claiming to own, or having or claiming to have an  
9 interest in any of said Subject Properties have neglected and refused to pay such delinquent taxes  
10 and interest as of the date of the filing of this Complaint. There is now due, owing and unpaid to  
11 Plaintiff the sums set out in said Tax Foreclosure List, plus interest on such sums at the rate of  
12 sixteen percent (16%) per annum from August 19, 2025 until date of judgment.

13 6. The Defendants include each and every person appearing on the latest tax roll as  
14 the owner or owners of the Subject Properties.

15 7. The Defendants, including unknown persons, have or claim to have some interest  
16 or estate in the Subject Properties described in the Tax Foreclosure List, but whatever interest or  
17 estate they may have or claim to have is inferior and subject to the tax liens of Plaintiff.

18 8. Each of the Subject Properties described in said Tax Foreclosure List was duly  
19 listed for taxation in or for each of the specified years shown on the Tax Foreclosure List, and  
20 the assessments, equalizations, levies of taxes and all other acts required by law to make such  
21 taxes first liens on such properties were duly and regularly made and done, and the liens and  
22 claims of Plaintiff to each of the Subject properties are first liens and paramount to any other  
23 interest, title, estate or claim in or to any of such properties.

24 9. Upon sale of the foreclosed Subject Properties, Plaintiff may require the  
25 assistance of this Court to remove persons and property unlawfully occupying the foreclosed  
26

1 Subject Properties. For this reason, Plaintiff requests that this court retain jurisdiction after entry  
2 of judgment for purposes of enforcing the judgment including, if necessary, issuance of any writs  
3 of assistance and/or writs of execution.

4 WHEREFORE, Plaintiff prays for Judgment of this court:

5 1. For the full amount of taxes, fees (including, without limitation, publication fee  
6 and foreclosure fee) and interest due on and charged against each of the Subject Properties on the  
7 Tax Foreclosure List, together with interest thereon at the rate of sixteen percent (16%) per  
8 annum from August 19, 2025 to the date of judgment, and interest on said Judgment at the rate of  
9 nine percent (9%) per annum; and

10 2. For Judgment that the amounts of such taxes, fees and interest are first liens on  
11 the respective Subject Properties included in said Tax Foreclosure List; and that such liens are  
12 paramount and superior to any and all claims to such properties by Defendants, or any of them,  
13 or by any other person known or unknown, owning or claiming to own, or having or claiming to  
14 have any lien thereon, or right, title or interest therein, and that each and all of them be forever  
15 foreclosed and barred from asserting any claims whatsoever to any of said Subject Properties  
16 adverse to the liens and claims of Plaintiff, its successors or assigns, excepting only the right of  
17 redemption as provided by law; and that each of the Subject Properties against which the  
18 Judgment is entered shall be ordered sold to Deschutes County for the respective amounts of  
19 taxes and interest for which such properties are liable; and

20 3. That Plaintiff be directed to serve on and deliver a copy of the Judgment to the  
21 Assessor and Tax Collector of Deschutes County, in which shall be a list of the Subject  
22 Properties so ordered sold, with the amounts due thereon; and that said Judgment shall constitute  
23 and be considered for all intents and purposes a certificate of sale to the County for each of the  
24 Subject Properties herein described; and that said Assessor and Tax Collector shall take such  
25 further steps in the matter as are provided by law; and

1           4.       That this court retain jurisdiction after entry of judgment for purposes of  
2 enforcing the judgment including, as necessary, issuance of writs of assistance and/or writs of  
3 execution; and

4           5.       For such other and further relief as the Court deems necessary, just and equitable.  
5

6 DATED: August 19, 2025.

/s/ Kimberly Riley  
Kimberly Riley, OSB #223118  
Sr. Assistant Legal Counsel  
541-388-6597  
kim.riley@deschutes.org  
Attorney for Deschutes County

# **DESCHUTES COUNTY 2025 FORECLOSURE LIST**

The Tax Collector of Deschutes County, Oregon, has prepared the following list of all properties now subject to foreclosure and henceforth constituting the Foreclosure List. The Foreclosure List contains the names of the person(s) appearing in the latest tax roll as respective owners of tax delinquent properties, a description of each property as the same appears in the latest tax roll, the year or years for which taxes, special assessments, fees or other charges are delinquent on each property, together with the principal of the delinquent amount of each year and the amount of accrued and accruing interest thereon through August 19, 2025. To all persons or properties herein named and identified and to all persons owning or claiming to own, or having or claiming to have, any interest in any property included in the following Foreclosure List:

## **Exhibit 1**

TAX ACCT	OWNER NAME SITUS ADDRESS	MAP NO.	YEARS	DELINQ TAXES	INTEREST TO 8/19/25	TOTAL DUE
129272	ALVAREZ, MICHAEL AUSTIN 5560 SW LOMA LINDA DR REDMOND, OR 97756	151236-C0-01202	2024-25 2023-24 2022-23 2021-22	1,185.30 1,129.96 1,037.17 1,005.90	105.36 281.23 424.09 576.72	1,290.66 1,411.19 1,461.26 1,582.62
					Total amount due:	5,745.73
130459	ATP LLC 21330 YOUNG AVE BEND, OR 97703	161211-00-00800	2024-25 2023-24 2022-23 2021-22	5,097.70 4,869.66 4,479.26 2,200.10	453.13 1,212.01 1,831.52 1,203.34	5,550.83 6,081.67 6,310.78 3,403.44
					Total amount due:	21,346.72
138876	BARTON,CHRISTOPHER 16889 INDIGO LN BEND, OR 97707	211001-B0-08801	2024-25 2023-24 2022-23 2021-22	1,545.01 1,511.47 1,388.68 1,356.33	137.34 376.18 567.82 777.63	1,682.35 1,887.65 1,956.50 2,133.96
					Total amount due:	7,660.46
129967	BATS, RICHARD A II 4800 W HWY 126 REDMOND, OR 97756	151318-00-02400	2024-25 2023-24 2022-23 2021-22	3,236.05 3,092.48 2,845.63 2,767.00	287.65 769.68 1,163.54 1,586.41	3,523.70 3,862.16 4,009.17 4,353.41
					Total amount due:	15,748.44
114707	BOUFFARD,RICHARD C 52260 UNION RD LA PINE, OR 97739	221005-A0-06300	2024-25 2023-24 2022-23 2021-22	2,252.54 2,203.09 2,019.39 1,015.24	200.22 548.32 825.71 555.78	2,452.76 2,751.41 2,845.10 1,571.02
					Total amount due:	9,620.29
194598	BROWN, DAVID G & MONICA J 2359 NW TODDS CREST DR BEND, OR 97703	171229-CA-00110	2024-25 2023-24 2022-23 2021-22	7,770.53 7,203.34 6,928.41 6,730.76	690.71 1,792.83 2,832.95 3,858.97	8,461.24 8,996.17 9,761.36 10,589.73
					Total amount due:	37,808.50
179499	BRUMITT, CAMILLA 3317 SW QUARTZ AVE REDMOND, OR 97756	151320-BB-08400	2024-25 2023-24 2022-23 2021-22	2,528.87 2,418.50 2,266.80 2,126.18	224.80 601.94 926.86 1,219.01	2,753.67 3,020.44 3,193.66 3,345.19
					Total amount due:	12,312.96
138657	CARROLL, JAYNE E BRINTON, TIFFANY KELL CARROLL, JAYNE ELIZABETH 17662 CLUSTER CABIN LN SUNRIVER, OR 97707	201105-C0-90018	2024-25 2023-24 2022-23 2021-22	2,278.66 2,209.45 2,122.25 69.60	202.55 549.91 867.76 37.12	2,481.21 2,759.36 2,990.01 106.72
					Total amount due:	8,337.30
142214	CRUSE, DAVID W 51240 RIVERLAND AVE LA PINE, OR 97739	221016-C0-05300	2024-25 2023-24 2022-23 2021-22	3,267.40 3,195.06 5,299.01 5,104.99	290.44 795.22 2,166.71 2,924.49	3,557.84 3,990.28 7,465.72 8,029.48
					Total amount due:	23,043.32
122087	CUMMINS,DWIGHT B & ELDON D 17243 JACINTO RD BEND, OR 97707	201107-C0-06800	2024-25 2023-24 2022-23 2021-22	934.79 914.58 846.98 402.45	83.09 227.63 346.33 219.70	1,017.88 1,142.21 1,193.31 622.15
					Total amount due:	3,975.55
129175	<del>DECLARATION OF TRUST AND AGREEMENT FOR THE BENEFIT OF CHARLOTTE JEAN DAVIS DAVIS,MICHAEL SCOTT SUCCESSOR TRUSTEE</del>	<del>151225-00-01901</del>	<del>2024-25 2023-24 2022-23</del>	<del>3,540.22 3,376.91 3,101.57</del>	<del>314.69 840.47 1,268.20</del>	<del>3,854.91 4,217.38 4,369.77</del>

4641 SW 58TH ST  
REDMOND, OR 97756

2021-22 1,394.75 759.52 2,154.27

Total amount due: 14,596.33

116406	DEBERNARDI, JAROD 17056 NORWALK RD BEND, OR 97707	201013-A0-13200	2024-25	401.59	35.69	437.28
			2023-24	393.88	98.03	491.91
			2022-23	367.76	150.37	518.13
			2021-22	745.74	427.56	1,173.30
			Total amount due:			2,620.62
137522	FARMER, AIMEE LYNN 16833 BRENDA DR BEND, OR 97707	201025-BB-02400	2024-25	256.04	22.76	278.80
			2023-24	252.20	62.77	314.97
			2022-23	243.05	99.38	342.43
			2021-22	239.19	137.13	376.32
			Total amount due:			1,312.52
122713	HARDIN, JANICE P 755 NW CANYON DR REDMOND, OR 97756	151309-DB-02703	2024-25	2,999.95	266.66	3,266.61
			2023-24	2,869.03	714.07	3,583.10
			2022-23	2,688.82	1,099.43	3,788.25
			2021-22	2,522.06	1,445.98	3,968.04
			Total amount due:			14,606.00
117160	HARTER, AMANDA R 56529 ECLIPSE DR BEND, OR 97707	201107-C0-11500	2024-25	1,283.21	114.06	1,397.27
			2023-24	1,254.79	312.31	1,567.10
			2022-23	1,160.08	474.34	1,634.42
			2021-22	1,132.89	649.52	1,782.41
			Total amount due:			6,381.20
115561	RONALD E HARTER REVOCABLE LIVING TRUST HATER, SCOTT A TRUSTEE C/O SCOTT HARTER 17139 BAKERSFIELD RD BEND, OR 97707	201012-AA-05900	2024-25	1,055.87	93.86	1,149.73
			2023-24	1,032.79	257.05	1,289.84
			2022-23	955.77	390.80	1,346.57
			2021-22	933.72	535.32	1,469.04
			Total amount due:			5,255.18
<del>135513</del>	<del>HYLAND, DAVID V II 69310 SCABBARD SISTERS, OR 97759</del>	<del>141031-D0-04200</del>	2024-25	<del>3,950.17</del>	<del>351.13</del>	<del>4,301.30</del>
			2023-24	<del>3,839.72</del>	<del>955.66</del>	<del>4,795.38</del>
			2022-23	<del>3,650.53</del>	<del>1,492.66</del>	<del>5,143.19</del>
			2021-22	<del>3,561.73</del>	<del>2,042.05</del>	<del>5,603.78</del>
			Total amount due:			<del>19,843.65</del>
119793	LITEHISER, DONNA & LITEHISER, TRAVIS 20004 ALDERWOOD CIR BEND, OR 97702	181206-DD-05100	2024-25	1,901.22	169.00	2,070.22
			2023-24	1,762.53	438.68	2,201.21
			2022-23	1,695.31	693.19	2,388.50
			2021-22	399.75	213.20	612.95
			Total amount due:			7,272.88
<del>132630</del>	<del>MACCRONE, JENNIFER-DOERING 65390-KIOWA DR BEND, OR 97703</del>	<del>161221-D0-00200</del>	2024-25	<del>1,186.39</del>	<del>105.46</del>	<del>1,291.85</del>
			2023-24	<del>1,121.51</del>	<del>279.14</del>	<del>1,400.65</del>
			2022-23	<del>1,063.81</del>	<del>434.98</del>	<del>1,498.79</del>
			2021-22	<del>962.29</del>	<del>548.94</del>	<del>1,511.23</del>
			Total amount due:			<del>5,702.52</del>
<del>115696</del>	<del>MAY, CHAD H &amp; SANDRA J 16958 COVINA RD BEND, OR 97707</del>	<del>201012-B0-00600</del>	2024-25	<del>5,589.35</del>	<del>496.83</del>	<del>6,086.18</del>
			2023-24	<del>5,460.46</del>	<del>1,359.04</del>	<del>6,819.50</del>
			2022-23	<del>5,030.21</del>	<del>2,056.80</del>	<del>7,087.01</del>
			2021-22	<del>1,872.95</del>	<del>1,008.41</del>	<del>2,881.36</del>
			Total amount due:			<del>22,874.05</del>
143417	MCCASLIN, JAMES E ESTATE OF ***NO SITUS ADDRESS***	201804-00-07000	2024-25	16.95	2.03	18.98
			2023-24	16.37	4.58	20.95
			2022-23	15.39	6.77	22.16
			2021-22	15.41	9.45	24.86
			Total amount due:			86.95
101249	MILLER, GARY EDMUNDS 109 NW WILMINGTON AVE BEND, OR 97703	171229-CD-01700	2024-25	11,372.01	1,010.85	12,382.86
			2023-24	10,541.83	2,623.75	13,165.58
			2022-23	10,139.53	4,145.94	14,285.47
			2021-22	8,065.44	4,552.80	12,618.24
			Total amount due:			52,452.15
108511	MURRAY, DYLAN 27650 FORD RD BEND, OR 97702	191533-00-00300	2024-25	1,320.03	117.34	1,437.37
			2023-24	1,292.43	321.68	1,614.11
			2022-23	1,225.25	500.98	1,726.23
			2021-22	554.85	302.16	857.01
			Total amount due:			5,634.72
186515	N H JEPSON INC ***NO SITUS ADDRESS***	181203-CC-05390	2024-25	30.22	3.63	33.85
			2023-24	27.91	7.81	35.72
			2022-23	27.65	12.17	39.82
			2021-22	27.69	16.98	44.67
			Total amount due:			154.06
122090	OTTLINGER, JOE R 17325 JACINTO RD BEND, OR 97707	201107-C0-05800	2024-25	1,998.09	177.60	2,175.69
			2023-24	1,953.08	486.10	2,439.18
			2022-23	1,802.65	737.08	2,539.73

			2021-22	1,759.28	1,008.65	2,767.93
					Total amount due:	9,922.53
116395	ROSE, STEVEN W 17055 NORWALK RD BEND, OR 97707	201013-A0-12100	2024-25	358.32	31.85	390.17
			2023-24	351.61	87.51	439.12
			2022-23	328.86	134.46	463.32
			2021-22	322.46	184.88	507.34
					Total amount due:	1,799.95
117330	ROSE, STEVEN W 17063 NORWALK RD BEND, OR 97707	201013-A0-12200	2024-25	1,092.53	97.11	1,189.64
			2023-24	1,068.59	265.97	1,334.56
			2022-23	988.68	404.27	1,392.95
			2021-22	965.74	553.69	1,519.43
					Total amount due:	5,436.58
107909	RUIZ, ANDREW M & OSBERG, ERIN C 59898 NAVAJO RD BEND, OR 97702	181136-AC-00100	2024-25	4,495.15	399.57	4,894.72
			2023-24	4,234.18	1,053.84	5,288.02
			2022-23	4,028.43	1,647.19	5,675.62
			2021-22	2,673.48	1,482.41	4,155.89
					Total amount due:	20,014.25
111270	RUIZ, ANDREW M & OSBERG, ERIN C 60096 NAVAJO RD BEND, OR 97702	181125-DD-02100	2024-25	1,608.94	143.02	1,751.96
			2023-24	1,518.03	377.82	1,895.85
			2022-23	1,446.42	591.42	2,037.84
			2021-22	879.95	485.66	1,365.61
					Total amount due:	7,051.26
159737	RUTH,RICHARD H 17843 BIG LEAF LN SUNRIVER, OR 97707	191129-DB-03600	2024-25	5,953.29	529.18	6,482.47
			2023-24	5,768.96	1,435.84	7,204.80
			2022-23	5,536.65	2,263.88	7,800.53
			2021-22	4,754.78	2,705.61	7,460.39
					Total amount due:	28,948.19
126768	SANNA, JOHN F 16354 BIG BUCK LN BEND, OR 97707	211003-D0-09000	2024-25	1,311.20	116.55	1,427.75
			2023-24	1,282.32	319.15	1,601.47
			2022-23	1,184.28	484.24	1,668.52
			2021-22	1,156.58	663.11	1,819.69
					Total amount due:	6,517.43
126769	SANNA, JOHN F 16360 BIG BUCK LN BEND, OR 97707	211003-D0-08900	2024-25	133.37	11.86	145.23
			2023-24	130.83	32.56	163.39
			2022-23	125.38	51.26	176.64
			2021-22	122.89	70.46	193.35
					Total amount due:	678.61
186056	SORENSEN,WHITNEY E 20725 WISHING WELL CT BEND, OR 97701	171216-DD-02400	2024-25	2,760.82	245.40	3,006.22
			2023-24	2,559.33	636.99	3,196.32
			2022-23	2,461.70	1,006.56	3,468.26
			2021-22	2,391.56	1,371.16	3,762.72
					Total amount due:	13,433.52
115335	STOCK, DOROTHY L ESTATE OF 51280 FESTIS AVE LA PINE, OR 97739	221016-C0-03400	2024-25	1,524.62	135.52	1,660.14
			2023-24	1,491.75	371.28	1,863.03
			2022-23	1,369.20	559.86	1,929.06
			2021-22	1,334.66	765.10	2,099.76
					Total amount due:	7,551.99
198039	WOLFBUILD LLC 4175 SW CANAL BLVD REDMOND, OR 97756	151330-DA-00100	2024-25	2,385.01	212.00	2,597.01
			2023-24	2,280.96	567.70	2,848.66
			2022-23	2,137.85	874.14	3,011.99
			2021-22	2,005.15	1,149.62	3,154.77
					Total amount due:	11,612.43
139079	WRIGHT, JAMES WESLEY II 16132 SPARKS DR LA PINE, OR 97739	211015-B0-05700	2024-25	995.78	88.51	1,084.29
			2023-24	949.53	236.32	1,185.85
			2022-23	878.32	359.13	1,237.45
			2021-22	858.22	492.05	1,350.27
					Total amount due:	4,857.86
125868	YOUSEY, KIM E 17294 SCAUP DR BEND, OR 97707	201119-BD-04900	2024-25	2,748.28	244.29	2,992.57
			2023-24	2,725.47	678.34	3,403.81
			2022-23	1,576.58	644.64	2,221.22
			2021-22	1,937.16	1,100.25	3,037.41
					Total amount due:	11,655.01

YOU ARE HEREBY REQUIRED TO TAKE NOTICE that Deschutes County, Oregon has on this 19<sup>th</sup> day of August, 2025, filed in the Circuit Court of the State of Oregon for Deschutes County, an Application for Judgment of Foreclosure to foreclose the lien of all taxes shown on the Deschutes County 2025 Foreclosure List, set forth herein, and that Deschutes County, as Plaintiff in said proceeding will apply to the Court for General Judgment of Foreclosure which shall foreclose such tax liens not less than thirty (30) days from the date of this Notice. Any, and all, persons interested in any of the real property included in said Foreclosure List are hereby required to file answer and defense, if any, to such Application for Judgment of Foreclosure within thirty (30) days from the date of the publication of this

Notice, which publication date is August 19, 2025. You may call the Deschutes County Tax Collector's office at (541) 388-6540 for a current total balance, including interest, on the day of payment. A copy of the Application for Judgment of Foreclosure can be viewed by clicking the "Foreclosure Lawsuit" link found at [www.deschutes.org/legalcounsel](http://www.deschutes.org/legalcounsel). Publication of this Notice is in compliance with ORS 312.040.

ROBERT TINTLE, Tax Collector  
Deschutes County, Oregon

KIMBERLY RILEY, Senior Assistant Legal Counsel  
Deschutes County, Oregon