

FILED

IN THE FRANKLIN COUNTY MUNICIPAL COURT  
ENVIRONMENTAL DIVISION  
FRANKLIN COUNTY, OHIO

2017 FEB -8 PM 12: 01  
FRANKLIN COUNTY  
MUNICIPAL COURT  
LORI W. TYACK

STATE EX. REL  
COLUMBUS CITY ATTORNEY  
RICHARD C. PFEIFFER, JR.  
375 South High Street, 17th Floor  
Columbus, Ohio 43215

Relator-Plaintiff,

v.

JOHN R. MOHLER  
647 Belvidere Ave.  
Columbus, Ohio 43223

And

ROBERTA MOHLER  
647 Belvidere Ave.  
Columbus, Ohio 43223

And

UNKNOWN TENANTS/OCCUPANTS  
OF 647 BELVIDERE AVE.  
647 Belvidere Ave.  
Columbus, Ohio 43223

And

CHARLOTTE CAMERON FULTON,  
TRUSTEE OF THE CHARLOTTE  
CAMERON FULTON TRUST  
AGREEMENT  
1368 Rosehill Rd.  
Reynoldsburg, OH 43068

And

WOODS COVE III LLC  
C/O NATIONAL REGISTERED AGENTS,  
INC.  
1300 E. 9<sup>th</sup> St.

Case No.

2017 EVH 60120

Judge Daniel R. Hawkins

Parcel No. 010-081590

Cleveland, OH 44114

**ALSO AT**  
1213 Prospect Ave., Suite 300  
Cleveland, OH 44115

**ALSO AT**  
P.O. BOX 7055  
Beverly Hills, CA 90212

And

**FRANKLIN COUNTY TREASURER**  
373 S. High St., 17<sup>th</sup> Floor  
Columbus, OH 43215

And

**REAL PROPERTY AT**  
**647 BELVIDERE AVE.**  
647 Belvidere Ave.  
Columbus, Ohio 43223

Respondents-Defendants.

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**TEMPORARY RESTRAINING ORDER**

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This matter came before the Court on February 8, 2017, on Relator's request for a temporary restraining order filed in conjunction with a Complaint for Preliminary and Permanent Injunctive Relief. In light of the circumstances, this motion was filed *ex parte*. For purposes of the temporary restraining order, the Court finds that the Relator has established that Respondents-Defendants John R. Mohler and Roberta Mohler and any Unknown Tenants/Occupants of 647 Belvidere Avenue are occupant(s) (in care or control) of the property located at 647 Belvidere Avenue, Columbus, Ohio. Respondents are all persons in charge, care or control of the property—parcel number 010-081590.

On information and belief, Relator asserts the following:

The Columbus Division of Police, Narcotics Bureau, have been investigating the property located at 647 Belvidere Avenue, Columbus, Ohio (hereinafter the "premises" or "property") for the last several months after receiving complaints about on-going drug sales and illegal activity occurring at the premises. On numerous occasions, Columbus Police Detectives have made covert purchases of crack-cocaine and heroin at the Premises. Columbus Police Detectives executed a search warrant at the premises on December 7, 2016 and thereafter on January 17, 2017. Items found during the two searches of the premises included: cash included pre-recorded City funds, digital scales, heavy narcotics, a gun, and ammunition.

Continued illegal drug sales and illegal activity at the property will cause immediate and irreparable harm to the surrounding community. Furthermore, pursuant to R.C. 3767 and Civil Rule 65, Relator has established that exigent circumstances exist to support the issuance of an *ex parte* restraining order in accordance with the Ohio Revised Code.

**IT IS THEREFORE ORDERED, ADJUDGED AND DECREED THAT:**

Relator has established by clear and convincing evidence that the felony drug activity and illegal/unsafe activity occurring at the premises continues to cause irreparable harm to the community and that the property is a nuisance per se as defined in R.C. § 3719.10 and 3767.01. It is the further ORDER of this Court that all occupants of 647 Belvidere Avenue, Columbus, Ohio be forcibly removed from the premises forthwith. Said occupants may be forcibly detained during the execution of this order. Furthermore, the premises shall be closed, padlocked, boarded or secured as deemed necessary by the Chief of the Columbus Police Department or his or her designee(s) against its use for any purpose until a final decision is rendered on the Complaint for Preliminary and Permanent Injunctive Relief as required by R.C. § 3767.04. This temporary restraining order shall apply to and prohibit usage of or entrance onto any curtilage or

porch areas of the premises for any purpose—no vehicles or persons are to be anywhere on the parcel.

It is further **ORDERED** that this temporary restraining order shall apply to the parcel in its entirety. No person may enter and/or occupy 647 Belvidere Avenue, Columbus, Ohio, including any portion of the parcel. Any violation of this order, including mutilation of this order, is contempt of court, punishable as a first degree misdemeanor.

It is further **ORDERED** that only necessary personal property located on the premises be removed by the occupants prior to closure and under the direction of the Columbus Division of Police. The Columbus Division of Police is authorized to inventory personal property located on the premises; however, only items related to or in connection with the illegal conduct must be inventoried and accounted for. The Columbus Division of Police may, however, also remove and secure at an off-site location highly mobile and valuable property, including but not limited to such personal property as automobiles, cash, jewelry and electronic equipment which may be at risk of theft during the pendency of this ORDER.

This case is continued for further preliminary hearing on the merits of Relator's Complaint for Preliminary and Permanent Injunctive Relief on the 17<sup>th</sup> day of Feb., 2017 at 11:00 A.M. in courtroom 15B, located on the 15<sup>th</sup> floor of 375 S. High Street, Columbus, Ohio 43215. This Order shall remain in effect until that time or as otherwise ordered by this Court.

This order shall be served upon the Respondents-Defendants by the Columbus Division of Police or Relator's Counsel; the order may be served by posting a copy of it in a conspicuous place at or upon one or more of the principal doors or entrances of the property. The closing of said premises at 647 Belvidere Avenue with forcible entry and removal of all occupants shall be

effectuated by the Columbus Division of Police with the assistance of Columbus Code Enforcement. Based on the Affidavits submitted with the Complaint and Motion, the Court finds that notice of entry upon the premises could result in destruction, concealment or removal of contraband, illegal narcotics or property and could create a serious risk of physical harm to law enforcement officers or other authorized individuals in the execution of this *ex parte* Order.

**IT IS SO ORDERED.**

2/8/17  
DATE

  
\_\_\_\_\_  
JUDGE DANIEL HAWKINS

IN THE FRANKLIN COUNTY MUNICIPAL COURT  
ENVIRONMENTAL DIVISION  
COLUMBUS, OHIO

17 FEB -8 AM 11:11

FRANKLIN COUNTY  
MUNICIPAL COURT  
LORILEY TYACK

STATE EX REL.  
COLUMBUS CITY ATTORNEY  
RICHARD C. PFEIFFER, JR.,

RELATOR-PLAINTIFF,

v.

JOHN R. MOHLER, ET AL.,

RESPONDENTS-DEFENDANTS.

CASE No 2017 EV H 60120

JUDGE: Daniel R. Hawkins

PARCEL NO. 010-081590

**MOTION FOR EX PARTE TEMPORARY RESTRAINING ORDER**

Relator-Plaintiff Columbus City Attorney Richard C. Pfeiffer, Jr. hereby moves for a temporary restraining order ("TRO") pursuant to R.C. 3767.04(B)(2) and Civ.R. 65(A). Support for this motion is found in the Affidavit and Certification of Assistant City Attorney Kristen M. Dickerson for Relator Columbus City Attorney Richard C. Pfeiffer, Jr. (hereinafter "Relator"). Relator moves this Court for an *ex parte* temporary restraining order against the Respondents and all persons acting in concert or participating with them in violating the Ohio Revised Code (hereinafter "R.C.") public drug nuisance laws at 647 Belvidere Avenue, Columbus, Ohio (hereinafter "property" or "premises") or any other location pending hearing and determination of the Complaint for Preliminary and Permanent Injunctive Relief filed in the above-styled case. The illegal criminal activity occurring at the premises, as evidenced by the attached Complaint and Affidavits (*See Attached Plaintiff's Exhibits C and D*), constitutes a public nuisance as defined by R.C. § 3719.10 and § 3767 and constitutes an immediate threat to the life, health and safety of the area community.

Relator further requests that the Premises be closed and padlocked against its use for any purpose until further order of this Court.

Respectfully Submitted,

City of Columbus, Department of Law  
Richard C. Pfeiffer, Jr., City Attorney



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Kristen M. Dickerson (0088727)  
Assistant City Attorney  
375 South High Street, 17<sup>th</sup> Floor  
Columbus, Ohio 43215  
Phone: (614) 645-8928  
[kmdickerson@columbus.gov](mailto:kmdickerson@columbus.gov)  
*Counsel for the Relator-Plaintiff*

STATE OF OHIO )  
CITY OF COLUMBUS ) ss:  
FRANKLIN COUNTY )

**Affidavit of Detective Mark George #105 Columbus Division of Police**

Now comes Detective Mark George of the Columbus Division of Police having been duly cautioned and sworn who says:

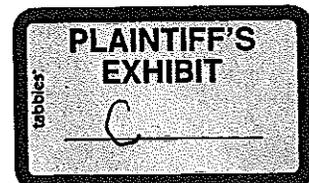
- 1) I am currently employed by the Columbus Div. of Police, Narcotics Bureau.
- 2) The Columbus Division of Police, Narcotics Bureau, began investigating the property at 647 Belvidere Avenue, Columbus, Ohio (hereinafter "premises" or "property") after receiving complaints about on-going drug sales and illegal activity occurring at the premises.
- 3) This investigation has been on-going for the last several months. Multiple covert purchases of crack-cocaine and heroin have been attained at 647 Belvidere Avenue.
- 4) As a result of the covert purchases of crack-cocaine/heroin, Columbus Police Detectives executed a search warrant at the premises on December, 7, 2016. I was a part of this search warrant executed, and items found during the search of the property included the following: cash (included pre-recorded city funds); 3 digital scales; 1.2 grams crack-cocaine; 16.13 grams heroin; .94 grams marijuana; miscellaneous ammunition; 3 security cameras.
- 5) Record owners of the property John R. Mohler and Roberta Mohler were inside during the search warrant executed December, 7, 2016. I spoke with them about the illegal activity, the possibility of an abatement lawsuit if it did not cease, and even had Mr. Mohler sign a police letter acknowledging all of this (copy left with him).
- 6) Even though the owners were put on notice, were present at the search warrant execution, and were told of the potential for an abatement action, drug activity continued after this. I myself was involved in two more investigations after this where two covert purchases of heavy narcotics (crack-cocaine) were attained at the property (on December 7, 2016 and January 16, 2017).
- 7) The illegal activity at the property presents a major safety problem; especially since school-aged children are in the area. There is also a high risk for drug overdoses stemming from the property, not to mention concerns with the prostitution activity at the property and weapons.
- 8) In my professional opinion, any advance notice of any police entry into a residence where illegal drug and gun-related activities are suspected would create an unnecessary and unacceptable degree of risk to life and limb of the officers involved and would result in the concealment, destruction or removal of narcotics, illegal contraband or property.

FURTHER SAYETH NAUGHT.

*Mark C. George #105*  
Mark George #105

Sworn to and Subscribed in my presence this 8<sup>th</sup> day of February 2017.

*Simone Y. Burley*  
Notary Public



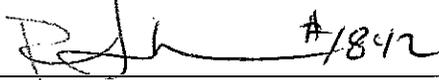
STATE OF OHIO )  
CITY OF COLUMBUS ) ss:  
FRANKLIN COUNTY )

**Affidavit of Detective Russell Weiner #1842 Columbus Division of Police**

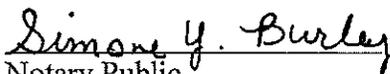
Now comes Detective Russell Weiner of the Columbus Division of Police having been duly cautioned and sworn who says:

- 1) I am currently employed by Columbus Div. of Police, Narcotics Bureau.
- 2) The Columbus Division of Police, Narcotics Bureau, began investigating the property at 647 Belvidere Avenue, Columbus, Ohio (hereinafter "premises" or "property") after receiving complaints about on-going drug sales and illegal activity occurring at/around the premises.
- 3) This investigation has been on-going for the last several months. Multiple covert purchases of heroin and crack-cocaine from the premises resulted from our Narcotics Bureau investigation. I personally was involved in investigations resulting in 2 covert purchases of heavy narcotics (on December 5, 2016 and January 16, 2017).
- 4) As a result of the covert purchases of crack-cocaine, we executed a second search warrant on January 17, 2017, where the following was found after forceful entry: 2 digital scales; .45 grams crack-cocaine; cash; miscellaneous ammunition; 12 gauge shotgun; 12 gauge shell; and 10 people were inside during the execution of the warrant, including owner John R. Mohler who was charged with Permitting Drug Abuse.
- 5) This property is draining Columbus police patrol's time and resources.
- 6) In my professional opinion, any advance notice of any police entry into a residence where illegal drug and/or gun-related activities are suspected creates an unnecessary and unacceptable degree of risk to life and limb of the officers involved and would result in the concealment, destruction or removal of narcotics, illegal contraband or property.

FURTHER SAYETH NAUGHT.

  
\_\_\_\_\_  
Russell Weiner #1842

Sworn to and Subscribed in my presence this 8<sup>th</sup> day of February 2017.

  
\_\_\_\_\_  
Notary Public



**Simone Y. Burley**  
Notary Public, State of Ohio  
My Commission Expires 06-09-2019



IN THE FRANKLIN COUNTY MUNICIPAL COURT  
ENVIRONMENTAL DIVISION  
COLUMBUS, OHIO

FRANKLIN COUNTY  
MUNICIPAL COURT  
LOCAL MAIL TRACK

FILED RD  
FEB-8 AM 11:12

STATE EX REL.  
COLUMBUS CITY ATTORNEY  
RICHARD C. PFEIFFER, JR.,

RELATOR-PLAINTIFF,

v.

JOHN R. MOHLER, ET AL.,

RESPONDENTS-DEFENDANTS.

CASE No

2017 EV H. 60120

JUDGE: Daniel R. Hawkins

PARCEL NO. 010-081590

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ATTORNEY'S CERTIFICATION, CIVIL RULE 65

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Assistant City Attorney Kristen Dickerson, attorney for Relator-Plaintiff Columbus City Attorney Richard C. Pfeiffer, Jr., pursuant to Civil Rule 65, hereby certifies the following:

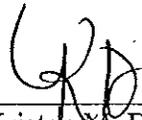
- A. No attempts have been made to notify Respondents-Defendants of this motion for an *ex parte* temporary restraining order.
- B. Notice of this Motion for an *ex parte* temporary restraining order should not be required because:
  - 1. Over the last several months, there have been numerous police calls for service at the property, and various complaints of illegal activity.
  - 2. Over the last several months, Columbus Police have been investigating the property due to complaints of illegal activity.
  - 3. There have been multiple controlled buys of heavy narcotics at the property, involving Columbus Police and confidential informants—both of whom are at risk with advance notice and if the property remains open.

4. Based on the controlled buys two search warrants have been executed of recent.
5. On December 7, 2016, the Columbus Police Department's Narcotics Unit executed a search warrant at 647 Belvidere Avenue, Columbus, Ohio. The following items were seized/found after the door had to be forced open:
  - a. Cash (including \$20 pre-recorded City funds)
  - b. Three (3) digital scales
  - c. 1.2 grams crack-cocaine
  - d. 16.13 grams heroin
  - e. .94 gram marijuana
  - f. Miscellaneous ammunition
  - g. Three (3) security cameras
  - h. Record owners John R. Mohler and Roberta Mohler were present inside
6. On January 17, 2017, the Columbus Police Department's Narcotics Unit again executed a search warrant at 647 Belvidere, Columbus, Ohio. The following items were seized/found after the door had to be forced open:
  - a. Two (2) digital scales
  - b. .45 grams crack-cocaine
  - c. Cash
  - d. **Miscellaneous ammunition**
  - e. **12 Gauge Shotgun**
  - f. **12 Gauge shell**
  - g. **Ten (10) people were inside at the time of the execution, and owner John R. Mohler was again present, and was charged with Permitting Drug Abuse**
7. The property is an area one-stop-shop for crack-cocaine and heroin, and the property serves to fuel the habits of addicts, including known prostitutes—there is imminent danger for those at the property and for those around the property.

8. Failing to immediately padlock the property after the execution of the *ex parte* temporary restraining order will allow the dangerous illegal activity to continue, thereby causing immediate and irreparable injury, loss or damage to the applicant and the community (note a school is just a couple blocks away).
9. *Ex parte* closure of the property is necessary in order to prevent destruction or removal of contraband or other property.
10. Prior notification of the temporary restraining order could pose a danger to the physical safety and lives of the Columbus police officers involved in its execution.
11. The property rights of Respondents-Defendants will be sufficiently protected in that they will be notified in advance of the hearing for Preliminary Injunctive Relief that will be held within roughly ten (10) days after issuing the *ex parte* Temporary Restraining Order.

Respectfully Submitted,

City of Columbus, Department of Law  
Richard C. Pfeiffer, Jr., City Attorney



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Kristen M. Dickerson (0088727)  
Assistant City Attorney  
375 South High Street, 17<sup>th</sup> Floor  
Columbus, Ohio 43215  
Phone: (614) 645-8928  
Email: [kmdickerson@columbus.gov](mailto:kmdickerson@columbus.gov)  
*Counsel for the Relator-Plaintiff*  
Columbus City Attorney  
Richard C. Pfeiffer, Jr.

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UNKNOWN TENANTS/OCCUPANTS  
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And

CHARLOTTE CAMERON FULTON,  
TRUSTEE OF THE CHARLOTTE  
CAMERON FULTON TRUST  
AGREEMENT  
1368 Rosehill Rd.  
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And

WOODS COVE III LLC  
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Case No.

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**ALSO AT**  
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And

**FRANKLIN COUNTY TREASURER**  
373 S. High St., 17<sup>th</sup> Floor  
Columbus, OH 43215

And

**REAL PROPERTY AT**  
**647 BELVIDERE AVE.**  
647 Belvidere Ave.  
Columbus, Ohio 43223

Respondents-Defendants.

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**VERIFIED COMPLAINT FOR PRELIMINARY  
AND PERMANENT INJUNCTIVE RELIEF**

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1. This complaint concerns enforcement of the Ohio Revised Code (hereinafter "R.C.") Chapter 3767 et seq., other code provisions, and common law so as to be within the exclusive jurisdiction of the Environmental Division of the Franklin County Municipal Court pursuant to R.C. § 1901.183.
2. Relator-Plaintiff Richard C. Pfeiffer, Jr. is the duly-elected, sworn, and acting City Attorney for the City of Columbus, Ohio and is a party charged at both common law and by R.C. § 3767.03 with the prevention, prosecution, and abatement of any public nuisance within the City of Columbus, Franklin County, Ohio.
3. The real property that is the subject matter of this complaint is located at 647 Belvidere Ave., Columbus, Ohio, 43223, (hereinafter "the premises" or the "property"), known as

Franklin County Permanent Parcel No. 010-081590, situated in the City of Columbus, Franklin County, Ohio.

4. All Respondents-Defendants have been owners, occupants, and/or persons with charge, care or control of the premises at all times relevant to this Complaint.
5. Respondents-Defendants John R. Mohler and Roberta Mohler (hereinafter also referred to as “owner(s)” and/or “landlord(s)”) are the record owners of 647 Belvidere Ave., Columbus, Ohio, 43223 by virtue of a Deed of Executor Instrument No. 200104110075347 (*See Also Plaintiff's Exhibit A & B*).
6. Respondents-Defendants Unknown Tenants/Occupants have occupied the premises and/or exerted charge, care and control over it.
7. Charlotte Cameron Fulton, Trustee of the Charlotte Cameron Fulton Trust Agreement, may claim an interest in the property pursuant to a mortgage—Instrument No. 200608250169486.
8. Woods Cove III LLC may claim an interest in the property pursuant to several tax certificates they have purchased over the years—Instrument No.'s 201211200177425; 201310090171297; and 201509010122740.
9. Ronald J. Hagan is the duly appointed, sworn, and serving Treasurer of Franklin County, Ohio, and may claim an interest in the property for unpaid taxes.
10. The premises is a single family dwelling located off West Mound Street within the South Central Hilltop area.
11. The premises is 0.1 mile away from West Mound Elementary School (roughly two (2) blocks).
12. Over the last several months, Columbus Police have been investigating the property due to complaints of illegal activity.

13. On August 5, 2016, Columbus Police Narcotics Division made a covert purchase of heroin at 647 Belvidere Avenue, Columbus, Ohio, using pre-recorded City funds.
14. On December 5, 2016, Columbus Police Narcotics Division again made a covert purchase of crack-cocaine at 647 Belvidere Avenue, Columbus, Ohio, using pre-recorded City funds.
15. On December 7, 2016, Columbus Police Narcotics Division again made a covert purchase of crack-cocaine at 647 Belvidere Avenue, Columbus, Ohio, using pre-recorded City funds.
16. On December 7, 2016, the Columbus Police Department's Narcotics Unit executed a search warrant at 647 Belvidere Avenue, Columbus, Ohio. The following items were seized/found after the door had to be forced open:
  - a. Cash (including \$20 pre-recorded City funds)
  - b. Three (3) digital scales
  - c. 1.2 grams crack-cocaine
  - d. 16.13 grams heroin
  - e. .94 gram marijuana
  - f. Miscellaneous ammunition
  - g. Three (3) security cameras
  - h. Record owners John R. Mohler and Roberta Mohler were present inside**
17. On December 7, 2016, during the search warrant execution, Columbus Police spoke to John Mohler about the illegal activity, and further Mr. Mohler signed for receipt of a letter given to him—this police letter discussed the drug offenses occurring and how it could result in an abatement action if it continued.

18. On January 16, 2017, Columbus Police Narcotics Division again made a covert purchase of crack-cocaine at 647 Belvidere Avenue, Columbus, Ohio, using pre-recorded City funds.
19. On January 17, 2017, Columbus Police Narcotics Division again made a covert purchase of crack-cocaine at 647 Belvidere Avenue, Columbus, Ohio, using pre-recorded City funds.
20. On January 17, 2017, the Columbus Police Department's Narcotics Unit again executed a search warrant at 647 Belvidere, Columbus, Ohio. The following items were seized/found after the door had to be forced open:
  - a. Two (2) digital scales
  - b. .45 grams crack-cocaine
  - c. Cash
  - d. **Miscellaneous ammunition**
  - e. **12 Gauge Shotgun**
  - f. **12 Gauge shell**
  - g. **Ten (10) people were inside at the time of the execution, and owner John R. Mohler was again present, and was charged with Permitting Drug Abuse**
21. During the January 17, 2017 search warrant execution, Mr. Mohler again signed another on-site letter with police acknowledging the illegal activity and potential for an abatement action.
22. The property remains a public nuisance.
23. Respondents-Defendants John R. Mohler and Roberta Mohler have failed to pay their taxes for years, be responsible owners and neighbors, and are engaging in the illegal drug activity at their property.

24. The property is an area one-stop-shop for crack-cocaine and heroin, and the property serves to fuel the habits of addicts, including known prostitutes.
25. Someone is going to get shot in and/or around the property and/or people are going to overdose and potentially die if the property remains open for business.
26. Relator-Plaintiff alleges that the property is a public nuisance as defined in § 3767.01 and/or R.C. § 3767.12 (*et seq.*), C.C.C. 4703.01(F), and under common law, subject to abatement under R.C. § 3767.
27. Relator-Plaintiff asserts that the premises herein is generally reputed to be kept, conducted, and maintained for the purposes of committing violations of Ohio Revised Code 2925 (Drug Offenses), and for the purposes of illegal activity, including prostitution.
28. Respondents-Defendants are guilty of maintaining a nuisance at the premises, subject to abatement in accordance with R.C. 3767.01 (*et seq.*), for having a structure in violation of the laws pertaining to illegal drugs (including violations of R.C. Chapter 2925, R.C., R.C. 3719.10, etc.); such operations, and criminal activity at the premises, substantially interferes with the area's public decency, sobriety, peace, safety, welfare, and good order.
29. Respondents-Defendants own fixtures, furniture, and moveable property that have been used or are currently being used in conducting, maintaining, and facilitating said public nuisance.
30. Respondents-Defendants at all times relevant to this action maintained a public nuisance threatening the health, safety, and welfare of the People of the City of Columbus (and the health, safety, and welfare of those at 647 Belvidere Ave., and that of Columbus Police).

31. Respondents-Defendants are guilty of maintaining a nuisance at the premises based on their actual and constructive knowledge of the nuisance, as well as the well-known general reputation of the premises, which is prima-facie evidence of the nuisance and of knowledge of and of acquiescence and/or participation in the nuisance.

### **JUDGMENT AND RELIEF DEMANDED**

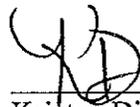
**WHEREFORE**, Relator demands judgment as follows:

1. Per R.C. § 3767 and Ohio Civ.R. 65(B)(1), that the court set a preliminary injunction hearing on the matter.
2. That the premises be declared a public nuisance as defined in Ohio Revised Code § 3767.01 and/or R.C. § 3767.12 (*et seq.*), C.C.C. 4703.01(F), and under common law, as alleged herein.
3. That all Respondents-Defendants be found to have been guilty of maintaining a public nuisance as defined in R.C. § 3767.01 and/or R.C. § 3767.12 (*et seq.*), C.C.C. 4703.01(F), and under common law, as alleged herein.
4. In accordance with this Complaint and Revised Code Chapter 3767, that all Respondents-Defendants, and any heirs, successors in interest or title, transferees and/or assigns be permanently enjoined from conducting, maintaining, using, occupying, or in any way permitting the use of the premises as a public nuisance.
5. In accordance with this Complaint and Revised Code Chapter 3767, that all Respondents-Defendants be permanently enjoined from conducting, maintaining, using, occupying, or in any way permitting the use of a public nuisance anywhere in Franklin County, Ohio and/or Columbus, Ohio.

6. On final judgment, the Chief of Police of Columbus, Ohio, be ordered to sell the furniture, fixtures, and moveable property identified herein in the manner provided for the sale of chattels under execution, and effectually close the entire premises against its use for a one year period per Civ.R. 65 and R.C. Chapter 3767 *et seq.*
7. To tax Respondents-Defendants \$300 in accordance with Revised Code § 3767.08, plus the costs of this action.
8. This Court appoint a receiver if needed pursuant to Chapter 2735 of the Ohio Revised Code.
9. An award of Plaintiff's cost and attorneys' fees payable by Defendant(s).
10. Relator-Plaintiff further requests that this Court grant Plaintiff the following relief as permitted by law:
  - (a) interest on all sums to which Relator-Plaintiff may be entitled;
  - (b) attorneys' fees and costs and expenses of this action; and
  - (c) all such further equitable and other relief this Court determines Relator-Plaintiff to be entitled.

Respectfully submitted,

City of Columbus, Department of Law  
Richard C. Pfeiffer, Jr., City Attorney



---

Kristen Dickerson (0088727)  
Assistant City Attorney  
375 South High Street, 17<sup>th</sup> Floor  
Columbus, Ohio 43215  
Phone: (614) 645-8928  
[kmdickerson@columbus.gov](mailto:kmdickerson@columbus.gov)  
*Counsel for the Relator-Plaintiff*



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**ParcelID: 010-081590-00** **Map-Rt: 010-M188 -064-00**  
**MOHLER JOHN** **647 BELVIDERE AV**

1 of 1

**Owner:**

---

**Owner:** MOHLER JOHN  
 MOHLER ROBERTA  
**Owner Address:** 647 BELVIDERE AVE  
 COLUMBUS OH 43223

**Legal Description:** BELVIDERE AVE  
 HIGH RIDGE EXT  
 LOT 8 BLK 10

**Calculated Acres:** .11  
**Legal Acres:** 0

**Tax Bill Mailing:** CHARLOTTE C FULTON TR  
 1368 ROSEHILL RD  
 REYNOLDSBURG OH 43068-2431

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**Social Media Links**



**Most Recent Transfers**

**Transfer Date:** APR-11-2001  
**Transfer Price:** \$77,000  
**Instrument Type:** ED

**2016 Tax Status**

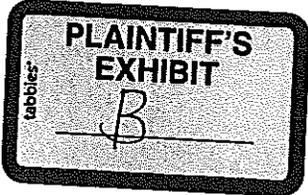
**Property Class:** R - Residential  
**Land Use:** 510 - ONE-FAMILY DWLG ON PLATTED LOT  
**Tax District:** 010 - CITY OF COLUMBUS  
**School District:** 2503 - COLUMBUS CSD  
**City/Village:** COLUMBUS CITY  
**Township:**  
**Appraisal Neighborhood:** 09400  
**Tax Lien:** Yes  
**CAUV Property:** No  
**Owner Occ. Credit:** 2016: Yes 2017: Yes  
**Homestead Credit:** 2016: No 2017: No  
**Rental Registration:** No  
**Board of Revision:** No  
**Zip Code:** 43223

**2016 Current Market Value**

	Land	Improvements	Total
Base	12,400	40,500	52,900
TIF Exempt			
<b>Total</b>	<b>12,400</b>	<b>40,500</b>	<b>52,900</b>
CAUV	0		

**2016 Taxable Value**

	Land	Improvements	Total
Base	4,340	14,180	18,520



TIF			
Exempt			
Total	4,340	14,180	18,520

2016 Taxes

Net Annual Tax	Taxes Paid	CDQ
1,226.82	0.00	2016

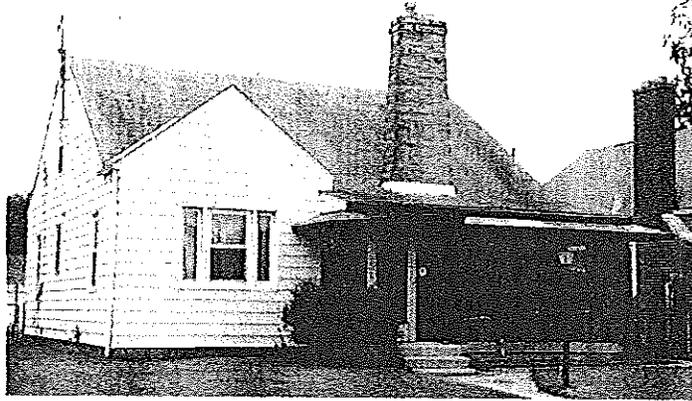
Dwelling Data

Yr Built	Tot Fin Area	Rooms	Bedrooms	Full Baths	Half Baths
1948	1,330	6	3	2	

Site Data

Frontage	Depth	Acres	Historic District
40	123	.1129	

Photo



010-081590 06/24/2014

Disclaimer:

The information on this web site is prepared from the real property inventory maintained by the Franklin County Auditor's Office. Users of this data are notified that the primary information source should be consulted for verification of the information contained on this site. The county and vendors assume no legal responsibilities for the information contained on this site. Please notify the Franklin County Auditor's Real Estate Division of any discrepancies.

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INSTRUCTIONS FOR SERVICE  
and  
WAIVER OF NOTIFICATION

FILED 00  
17 FEB -8 AM 11:11  
FRANKLIN COUNTY  
MUNICIPAL COURT  
LORI M. TYACK

FRANKLIN COUNTY MUNICIPAL COURT  
ENVIRONMENTAL CIVIL DIVISION, THIRD FLOOR  
375 SOUTH HIGH STREET, COLUMBUS, OHIO 43215

STATE EX. REL  
CITY OF COLUMBUS

vs.

JOHN R. MOHLER, ET AL.

2017 EV H 60120

.....Case No.....

TO THE CLERK OF COURTS:

You are instructed to make certified mail service, return receipt requested, to the defendants at the addresses set forth in the caption of this complaint. If service of process by certified mail is returned by the postal authorities with an endorsement of "refused" or "unclaimed" and if the certificate of mailing can be deemed complete not less than five (5) days before any scheduled hearing, the undersigned waives notice of the failure of service by the clerk and requests ordinary mail service in accordance with civil rule 4.6 (c) or (d) and O.R.C. 1923.06.

**Kristen M. Dickerson (0088727)**  
**Assistant City Attorney**  
[kmdickerson@columbus.gov](mailto:kmdickerson@columbus.gov)  
City of Columbus 614-645-8928  
**ATTORNEY OF RECORD**

DATE: 2-8-17

Signature 