

After recording return to:

City of Sedro-Woolley
City Attorney
325 Metcalf Street
Sedro-Woolley, WA 98284



201409290040

Skagit County Auditor

\$76.00

9/29/2014 Page

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5 8:47AM

Document Title: COMPLAINT FOR ABATEMENT

Grantor: City of Sedro-Woolley

Grantee: Public

Tax Parcel: P37207

Legal: The East 83 feet of the South 200 feet of the following described tract: The West ½ of the West ½ of the Southwest ¼ of the Northwest ¼ of Section 23, Township 35 North, Range 4 West, W.M., EXCEPT the South 20 feet thereof, AND EXCEPT that portion, if any lying within the as built and existing county road commonly known as Cook Road, Situate in Skagit County, Washington.

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3
4 BEFORE THE CITY OF SEDRO-WOOLLEY BUILDING OFFICIAL

5 CITY OF SEDRO-WOOLLEY, a municipal
6 corporation,
7 Plaintiff,

Case No.: CEF-6-12

COMPLAINT FOR ABATEMENT

8 vs.

9 REAL PROPERTY KNOWN AS 1024 COOK ROAD,
10 SEDRO-WOOLLEY, WASHINGTON, and all
11 appurtenances and improvements
12 thereon,

HEARING: October 24, 2014 at 4:00 P.M.

13 Defendant in rem,

14 DON A. WEILER, as single person, US
15 BANK TRUST NA, AMERICAN GENERAL
16 FINANCIAL SERVICES, WEST COAST
17 ADJUSTERS, SPRING LEAF FINANCIAL
18 SERVICES and CITY OF SEDRO-WOOLLEY,
19 Interested Parties.

20
21
22 TO: The Owners, Occupiers and Interested Parties of the Premises Located
23 at 1024 Cook Road, Sedro-Woolley, Washington 98284:
24
25

CITY ATTORNEY FRON REPC



201409290040

1 OWNER:

2 DON A WEILER
3 24327 State Street
4 Sedro-Woolley, WA 98284

4 INTERESTED PARTIES:

5 US BANK TRUST NA
6 13801 Wireless Way
7 OKLAHOMA CITY, OK 73134

8 AMERICAN GENERAL FINANCIAL SERVICES
9 1616 N. 18th Street, Suite 120
10 Mount Vernon, WA 98273

11 WEST COAST ADJUSTERS
12 P.O. Box 569
13 Lynnwood, WA 98045

14 SPRING LEAF FINANCIAL SERVICES
15 c/o James Draper, Attorney
16 400 108th Avenue NE, Suite 420
17 Bellevue, WA 98104

18 CITY OF SEDRO-WOOLLEY
19 325 Metcalf Street
20 Sedro-Woolley, WA 98284

21 Pursuant to SWMC 18.50, this is notice to you that the premises or
22 structure which you own, occupy or have an interest in is unsafe or unfit
23 for the following reasons:

- 24 1. A Notice & Order was previously issued on October 31, 2013
25 determining that the structure was unsafe and an immediate danger to
life and or safety citing IPMC 304.2 and IPMC 108.1 as a result of
structural and electrical deficiencies.
2. On July 4, 2014, the structures on site were substantially destroyed
by fire and again under IPMC 108.1 and 304.2 the structure is an
immediate danger to life and property.

CITY ATTORNEY ERON BERG
CITY OF SEDRO-WOOLLEY



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1 3. IPMC[A] 110.1 limits the use of boarding up a structure to one year;
2 this structure has been boarded up for more than one year.

3 Demolition or total reconstruction is required to meet the
4 conditions of the code. Property owner and/or interested parties
5 have taken no action to address these code violations.

6 4. An additional Notice of Violation was issued on September 16, 2014
7 which includes a current assessment of penalties and fines in the
8 amount of \$130,000.00 with additional fines accruing at a rate of
9 \$500.00 per day for non-compliance with the October 31, 2013 Notice
10 & Order.

11 A hearing shall be held on **OCTOBER 24th, 2014 at 4:00 P.M. at the**
12 **Municipal Courtroom, 325 Metcalf Street, Sedro-Woolley, Washington 98284**
13 to determine whether there is sufficient legal cause to order you to take
14 the following action: demolition of all structures on site. You may file a
15 written answer to this complaint by mailing or delivering it to the
16 address listed below. You may also appear at the hearing with or without
17 an attorney. Failure to answer and/or come to the hearing may result in
18 you being required to take the action described in the previous paragraph
19 or, failing that, paying for the City of Sedro-Woolley to take that
20 action.

21 DATED this 19th day of September, 2014:

22
23 
24 _____
ERON BERG, WSBA No. 29930

25
CITY ATTORNEY ERON BERG
CITY OF SEDRO-WOLLEY



201409290040

1 AFFIDAVIT OF SERVICE:

2 CHRISTINE SALSEINA declares under penalty of perjury, and states as follows:

3 That I am over the age of 18 years, not a party to this action, and competent to be a
4 witness herein; that I caused a true and correct copy of the following document(s):

- 5 1. Complaint for Abatement.

6 to be mailed by U.S. Mail, Certified, Postage Pre-Paid to the parties and addresses listed in the
7 complaint.

8 I declare under penalty of perjury under the laws of the State of Washington that the foregoing
9 is true and correct.

10 Signed at Sedro-Woolley, Washington on September 19, 2014.

Christine Salseina

11 AFFIDAVIT OF POSTING:

12 LAURA CARR declares under penalty of perjury, and states as follows:

13 That I am over the age of 18 years, not a party to this action, and competent to be a
14 witness herein; that I caused a true and correct copy of the following document(s):

- 15 1. Complaint for Abatement.

16 to be posted on-site at 1024 Cook Road, Sedro-Woolley, Washington 98284.

17 I declare under penalty of perjury under the laws of the State of Washington that the foregoing
18 is true and correct.

19 Signed at Sedro-Woolley, Washington on September 19, 2014.

Laura J. Carr #816



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21 Skagit County Auditor

\$76.00

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5 8:47AM

23 CITY ATTORNEY ERON BERG
24 CITY OF SEDRO-WOOLLEY
25 325 METCALF STREET
SEDRO-WOOLLEY, WA 98284
(360) 855-9922