

**STATE OF VERMONT**

**SUPERIOR COURT**

**CIIVL DIVISION**

**ADDISON UNIT**

**DOCKET NO. 22-CV-03611**

In re: Abandoned Mobile Home of Babecca Tahair  
22 Vaughn Court, Monkton, Vermont

**VERIFIED COMPLAINT**

NOW COMES ADDISON COUNTY COMMUNITY TRUST, Plaintiff, by and through its attorneys, Deppman Law PLC, and, pursuant to 10 V.S.A. § 6249, hereby files this action for sale of abandoned mobile home, and hereby complains of and alleges against Defendant as follows:

1. Addison County Community Trust, a Vermont non-profit corporation with a principal place of business in Vergennes, Addison County, Vermont, is the owner of the mobile home park located at Vaughn Court, Monkton, Vermont.

2. The names and last known addresses of the owners of the mobile home sited at 22 Vaughn Court, Monkton (physical address; mailing address is North Ferrisburgh) Vermont is:

Babecca Tahair

22 Vaughn Court

North Ferrisburgh, VT 05473

3. The name and last known mailing address of the last resident of the mobile home is:

Babecca Tahair

22 Vaughn Court

North Ferrisburgh, VT 05473

Babecca Tahair

PO Box 111

North Ferrisburgh, VT 05473

4. The mobile home is a 1983 mobile home, Commodore, model no. 900-17-1983, sited at 22 Vaughn Court, Monkton, Vermont. See Exhibit A, a true and correct copy of the mobile home bill of sale relative to the property.

5. Plaintiff is aware of no creditors, holders of housing subsidy covenants, or others having a valid interest in the mobile home based on liens or notices of record in Monkton Land Records or the Office of the Secretary of State.

6. The facts supporting the claim that the mobile home has been abandoned are as follows:

A. Plaintiff has received notice from her family that Ms. Tahair passed away and the family intends to abandon the mobile home.

B. Rent is not current.

7. A disinterested party such as Uriah Wallace Auction Service, located at PO Box 177, Post Mills, VT 05058 Thomas Hirchak Company, located at 1878 Cady Falls Road, Morrisville, VT 05661, is able to sell the mobile home at public auction.

8. The amount of rent due through the date of this action is \$2,370. Rent continues to accrue at the rate of \$395 per month. Plaintiff has incurred (and will continue to incur) attorneys' fees and court costs, and will incur costs in connection with the sale of the mobile home.

WHEREFORE, Plaintiff prays this Honorable Court grant the relief requested herein and all such other and further relief as to this Court may appear just and equitable.

Dated at Middlebury, Vermont this 7 day of October, 2022.

ADDISON COUNTY COMMUNITY TRUST

by DEPPMAN LAW PLC, its attorneys

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**VERIFICATION**

Christine Ouellette, duly authorized representative of Addison County Community Trust, Plaintiff herein, states the contents of the foregoing Complaint are true to the best of her knowledge, information and belief and the extent based upon information and belief she believes such information to be true.