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Hamilton County, Ohio
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CITY OF CINCINNATI

A 1702044

vs.

**HARBOUR PORTFOLIO
ADVISORS LLC**

**FILING TYPE: INITIAL FILING (IN COUNTY) WITH JURY
DEMAND**

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EFR200

**IN THE COURT OF COMMON PLEAS
HAMILTON COUNTY, OHIO**

CITY OF CINCINNATI

801 Plum Street

Cincinnati, Ohio 45202

Plaintiff,

vs.

HARBOUR PORTFOLIO

ADVISORS LLC

8214 Westchester Drive, Ste. 635

Dallas, TX 75225

-and-

HARBOUR PORTFOLIO

INTERNATIONAL FUND, INC.

8214 Westchester Drive, Ste. 635

Dallas, TX 75225

-and-

HARBOUR PORTFOLIO VI, LP

c/o CT Corporation System

1300 E. 9th Street

Cleveland, OH 44114

-and-

HARBOUR PORTFOLIO VII, LP

c/o CT Corporation System

1300 E. Ninth Street

Cleveland, Ohio 44114

-and-

HARBOUR PORTFOLIO VIII, LP

c/o Incorp Services, Inc.

9435 Waterstone Blvd., Ste. 140

Cincinnati, Ohio 45249

-and-

HARBOUR HIGH YIELD FUND, LLC

c/o Incorp Services, Inc.

9435 Waterstone Blvd. Ste. 140

Cincinnati, Ohio 45249

-and-

Case No.

Judge:

**COMPLAINT FOR INJUNCTIVE
AND DECLARATORY RELIEF
AND DAMAGES**

(Jury Demand Endorsed Hereon)

NATIONAL ASSET ADVISORS, LLC
4350 Saint Andrews Road, Suite G
Columbia, South Carolina 29210

-and-

NATIONAL ASSET MORTGAGE, LLC
4350 Saint Andrews Road, Suite F
Columbia, South Carolina 29210

-and-

JAMES R. WILLIAMS
3814 St. Lawrence Avenue
Cincinnati, Ohio 45205

-and-

1046 McPherson Avenue
(IN REM)

-and-

1931 Webman Court
(IN REM)

-and-

3171 Beekman Street
(IN REM)

-and-

3814 St. Lawrence Avenue
(IN REM)

-and-

TREASURER
OF HAMILTON COUNTY
138 East Court Street, Room 402
Cincinnati, Ohio 45202

-and-

AUDITOR OF HAMILTON COUNTY
138 East Court Street, Room 304-A
Cincinnati, Ohio 45202

Defendants.

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Plaintiff City of Cincinnati ("City"), for its Complaint ("Complaint") and Demand for Jury Trial against the Defendants operating in affiliation as Harbour Portfolio Advisors LLC; Harbour Portfolio International Fund, Inc; Harbour Portfolio VI, LP; Harbour Portfolio VII, LP; Harbour Portfolio VIII, LP; Harbour High Yield Fund, LLC; National Asset Advisors, LLC; and National Asset Mortgage, LLC (collectively, "Harbour") and the remaining named defendants, respectfully states as follows:

PRELIMINARY STATEMENT AND INTRODUCTION

1. Harbour is an investment firm based out of Dallas, Texas that manages a collection of limited partnerships throughout the United States that purchased distressed foreclosed real estate and resells them to consumers through predatory and unconscionable land sale contracts.
2. After the 2008 housing crisis, Harbour purchased 1000's of single-family homes in bulk sales from the Federal National Mortgage Association, and promptly sold or rented them to buyers in "as is" condition. Harbour often sold the homes for four or five times the purchase price it paid.
3. This action arises out of the failure of Harbour to register or maintain its properties located in the City of Cincinnati, as well as its actions to sell or rent those properties without disclosing the known defects at them.
4. The City also brings this action to abate the nuisances at several of Harbour's properties; to collect outstanding fees, fines, and other costs owed to it by Harbour; as well as for injunctive

and declaratory relief requiring Harbour to disclose known property defects to purchasers of properties they sell, or in the alternative, to take responsibility for repairs at properties which it sells or leases.

5. The properties at issue in this case are identified in Exhibit A of this Complaint, and referenced in Exhibits B through F of the Complaint.

6. Upon information and belief, in addition to the properties identified in Exhibit A of this Complaint, there may be additional unknown properties currently owned or controlled by Harbour or that will be acquired by Harbour, which are subject to relief in this action.

7. Pursuant to Ohio Civ. R. 38, the City hereby provides notice of its jury demand.

THE PARTIES

8. Plaintiff City of Cincinnati is a home-rule chartered municipal corporation under Article XVIII, Section 7 of the Ohio Constitution. The City is located in Hamilton County, Ohio.

9. Defendant Harbour Portfolio Advisors, LLC ("HP Advisors") is a Texas-based limited liability company that is not registered as a foreign limited liability company with the Ohio Secretary of State. Upon information and belief, HP Advisors manages a collection of partnerships that invest in foreclosed real estate.

10. Defendant Harbour Portfolio International Fund, Inc. is a Texas-based corporation that is not registered as a foreign limited liability company with the Ohio Secretary of State. Harbour Portfolio International Fund owns or owned properties that are the subject of this complaint.

11. Defendant Harbour Portfolio VI, LP is a Texas-based limited partnership that is registered with the State of Ohio as a foreign limited partnership. Harbour Portfolio VI owns or owned properties that are the subject of this complaint.

12. Defendant Harbour Portfolio VII, LP is a Texas-based limited partnership that is registered with the State of Ohio as a foreign limited partnership. Harbour Portfolio VII owns or owned properties that are the subject of this complaint.

13. Defendant Harbour Portfolio VIII, LP is a Texas-based limited partnership that is registered with the State of Ohio as a foreign limited partnership. Harbour Portfolio VIII owns or owned properties that are the subject of this complaint.

14. Defendant Harbour High Yield Fund LLC is a Texas-based limited liability company that is registered with the State of Ohio as a foreign limited liability company. Harbour High Yield Fund owns or owned properties that are the subject of this complaint.

15. Defendant National Asset Advisors LLC ("National Asset Advisors") is a South Carolina based limited liability company that is not registered with the State of Ohio. Upon information and belief, National Asset Advisors manages and markets properties that Harbour sells through land sale contracts.

16. Defendant National Asset Mortgage, LLC ("National Asset Mortgage") is a South Carolina based limited liability company that is not registered with the State of Ohio. Upon information and belief, National Asset Mortgage is a mortgage provider and collector of installment payments that services Harbour's land sale contracts.

17. James R. Williams III is a person residing at 3814 St. Lawrence Ave, Cincinnati, Ohio 45205 who entered into a land sale contract with a Harbour entity in 2012, and subsequently was cited for lead paint hazards at the property. Upon information and belief, the lead hazards at this property existed at the time that Harbour entered into its land sale contract with Mr. Williams.

18. One of the real properties that is a subject of this Complaint is 1046 McPherson Avenue, Cincinnati, Ohio 45205.

19. One of the real properties that is a subject of this Complaint is 1931 Webman Court, Cincinnati, Ohio 45223.

20. One of the real properties that is a subject of this Complaint is 3171 Beekman Street, Cincinnati, Ohio, 45225.

21. One of the real properties that is a subject of this Complaint is 3814 St. Lawrence Ave, Cincinnati, Ohio 45205.

22. The Treasurer and Auditor of Hamilton County, Ohio, may have, or claim to have, some interest in or lien upon the properties that are the subject of this action based on property taxes owed and unpaid.

JURISDICTION AND VENUE

23. Jurisdiction and venue are proper in this Court.

STATEMENT OF FACTS

24. Harbour owns, acquires, or otherwise takes control of real property in the City by purchasing foreclosed properties in bulk from the Federal National Mortgage Association ("Fannie Mae").

25. Such foreclosed homes are distressed and generally have open City code enforcement violations and other liabilities associated with them.

"Selling" the American Dream

26. Harbour's self-described business practices are "to purchase unproductive residential properties and sell them to other people who will make them productive again."¹

¹ Emily Badger, *Why a Housing Scheme Founded in Racism is Making a Resurgence Today*, Wash. Post, May 13, 2016.

27. Harbour has purchased over 6,000 single-family properties in Ohio, Michigan, Illinois, Florida, Georgia and Pennsylvania with the intention of “selling” them to unsuspecting buyers through predatory and unconscionable land sale contracts.²

28. Nearly all of the properties that Harbour buys from Fannie Mae have sat vacant and been damaged to some degree. As a result, Harbour is able to acquire these properties for as little as \$0, but otherwise, for very low dollar amounts from Fannie Mae.

29. Upon acquisition of these properties, Harbour summarily sells them in their sub-standard conditions through land sale contract for up to five times their purchase price to unsuspecting and vulnerable vendee-purchasers.

30. Harbour routinely enters into unlawful land sale contracts at residential properties with individuals who do not qualify for conventional financing.

31. Harbour enters into such agreements with vulnerable residents, but intentionally fails to disclose known defects about the properties, including building code orders and other violations.

32. There are numerous instances in which the City issued orders to Harbour for its blighted City properties, and not only did Harbour fail to address the violations or otherwise respond to the City, it subsequently entered into land sale contracts for those properties without disclosing those orders to the vendee-purchasers.

33. Harbour’s land sale contracts include an unusual provision in which, at the option of the seller, the land sale contract can be automatically converted into a deed and mortgage.

34. Upon information and belief, Harbour sometimes requires purchasers to simultaneously execute the paperwork for a land sale contract at the same time as a deed and mortgage for the

² Matthew Goldstein & Alexandra Stevenson, *High-Risk Deals on Shabby Homes Ensnare Buyers*, N.Y. Times, Feb. 20, 2016.

same property. It will record the land sale contract, unless or until problems arise at the property that cause liability to Harbour, at which time, it will outright deed the property to the purchaser.

35. In some instances, when the City's code enforcement efforts against Harbour have increased at certain properties, Harbour has converted the land sale contract agreement on its property to traditional mortgage and/or outright deeded the property to the grantee-occupant, sometimes unbeknownst to the latter.

36. Harbour's predatory business practices have been widely reported, and even prompted investigation by the Consumer Financial Protection Bureau ("CFPB").³

37. Harbour fails to disclose known violations at its properties and puts vulnerable families into homes that they cannot afford to fix up. In most instances, those contracts fail.

38. After it terminates a land sale contract at a property, Harbour churns the property through the process anew, by either entering into a new land contract with another unsuspecting or overly-optimistic consumer, or by flipping the property to an out-of-town investor. In either case, it does not disclose the known physical defects with the property, allowing it to continue to languish to the detriment of the City's neighborhoods and residents.

39. The Harbour properties are "purchased" on a land sale contract by vulnerable residents in "as-is" condition. These purchasers lose all of their investment when they cannot afford to both maintain the property and to make payments under their land sale contract, which leads to eviction.

40. The result of the unfair and predatory business practices employed by Harbour is a vicious cycle of blighted properties in the City.

41. Harbour's land sale contracts are not always recorded or reflected on the auditor's website as required by law.

³ *In Re Harbour Portfolio Advisors, LLC*, 2016-MISC-Harbor Portfolio -- 0001.

42. Although Harbour records some of its land sale contracts with the Hamilton County Recorder, it does not update that information with the Hamilton County Auditor.

43. Thus, while Harbour may allege that it is not responsible for code violations due to the existence of a land sale contract, the City has no way of knowing that information because it relies on the public information submitted to and provided by the Hamilton County Auditor's Office to determine the identity of the property owner and the address at which the owner should be contacted.

Code Violations

44. As part of its predatory land contracting practices, Harbour consistently fails to maintain properties that they own in accordance with state and local property maintenance laws.

45. Harbour's unlawful property maintenance practices and policies have persisted since at least 2011.

46. The City relies on the County Auditor's records for purposes of notifying owners of properties of code violations. Every Harbour-owned property indicates either a Dallas, Texas or Irmo, South Carolina, mailing address.

47. The City mails Harbour notices about all the property code violations and other liabilities at their properties at either its Dallas, Texas or Irmo, South Carolina mailing address, as indicated in the Auditor's records. Such notification is generally also posted to the premises, and sometimes mailed to it as well, depending on the nature of the violation or order.

48. For its dilapidated properties that Harbour does not have under a sale contract, it simply ignores the City's notice of violation and other code enforcement efforts.

49. For properties that are under land sale contract, Harbour does not notify owners of the City's orders.

50. Although land sale contract vendees are referred to as “purchasers,” and indeed, at some point believe they have achieved the American dream through homeownership, Harbour actually retains title to its land sale contract properties, and really, its land sale contracts are more akin to rent-to-own schemes, except that occupants are saddled with repairs.

51. Harbour, as the title holder, is responsible to the City for violations at its properties, even for those under land sale contract.

1046 McPherson Avenue

52. Harbour purchased the property at 1046 McPherson Avenue in March 2011 for \$2,618 from Fannie Mae.

53. The property is vacant and uninhabitable. A City inspector recently found that the concrete steps leading up to the property are collapsing; that the front porch is rotted out; that the wood garage doors are rotted and failing; and that the roof is open, causing extensive water damage to the interior.

54. The City has ordered this property vacated and kept vacant.

55. The property is certified tax delinquent since 2015.

1931 Webman Court

56. Harbour purchased the property at 1931 Webman Court in January 2014 for \$0 from Fannie Mae.

57. The property is vacant and uninhabitable.

58. The property is certified tax delinquent since 2016.

3171 Beekman Street

59. In May 2013, the City declared 3171 Beekman a public nuisance through its administrative processes. As a result of the hearing, an order was entered subjecting this property to demolition by the City.

60. Little over a year later, Harbour purchased the property at 3171 Beekman Street in June 2014 for \$0 from Fannie Mae.

61. In addition to the public nuisance declaration, at the time of purchase, the City also had open lead orders on the property because a child residing therein had tested for an elevated blood level greater than 70. Upon information and belief, the lead hazard is still not abated.

62. Because Harbour failed to respond to City notices that the property was standing open to the elements and trespassers, the City was forced to barricade the property on or about December of 2014, March of 2016, and December of 2016, costing the City over \$600.

63. The property is certified tax delinquent since 2015.

3814 Saint Lawrence Avenue

64. Harbour purchased the property at 3814 St. Lawrence Avenue in September 2011 for \$7,601 from Fannie Mae.

65. Harbour completed a land sale contract with James R. Williams III in January 2012 for \$40,700.

66. A child living in the home tested positive for lead poisoning and the City Health Department opened a case on the matter in June 2012.

67. The City vacated the property in 2012 due to the lead paint hazards and the property has not been cleared for re-habitation.

68. A child living in the home tested positive for lead poisoning and the Health Department opened a new case in February 2017.

69. The property is certified tax delinquent since 2016.

City's Monetary Claims

70. In addition to the nuisance issues at several of Harbour's properties, Harbour has amassed a significant amount of civil fines, fees, abatement costs and other liabilities with the City.

71. The properties identified in Exhibit A of the Complaint sets forth known properties that Harbour has owned at any point in time within the City since 2011, as well as those that it currently owns outside of the City, in Hamilton County.

72. Harbour fails to pay property taxes at its unproductive properties, and otherwise sells them to bottom feeder investors with impunity. Thus, the list of Exhibit A properties is extremely fluid. If Harbour still owns a property on the Exhibit A list, it is likely either because the property is occupied and its occupants are paying a monthly rent under an existing land sale contract, or because it is so blighted that Harbour is doing nothing at all with it, other than trying to offload it to a purchaser on the sub-housing market. The latter group mainly consists of out-of-town investors who acquire properties from Harbour, sight unseen, for bargain-basement prices.

73. Exhibits B through G of the Complaint identify each claim that the City asserts against the Harbour Defendants, including the address of the property at issue, the type of violation or the applicable Cincinnati Municipal Code provisions, the amount claimed, and the name of the Harbour Defendant that owns or owned the property.

74. Although Harbour may no longer own or control all of the properties identified in the attached Exhibits, they are nonetheless liable for fees, civil fines, and the City's abatement costs that occurred during Harbour's ownership or control.

75. The properties that are the subject of the City's monetary claims are blighted, problem buildings and properties that are, or were, owned or controlled by Harbour and are or were the subject of orders, citations, bills, utility assessments, and/or notices of violations from the City of Cincinnati.

76. For every property identified in Exhibits B through G of this Complaint, Harbour has been issued orders, citations, notices of violation, fines and/or invoices by the City at its mailing address, as indicated in the public record.

77. In addition to mailing, nearly all City orders, citations, and notices of violations were also posted at the premises at which the violation occurred.

78. The City has made multiple attempts to communicate with Harbour regarding the numerous properties and buildings owned or controlled by them throughout the City that were and are in violation of City health and housing codes.

79. Harbour has consistently failed to take responsibility for the maintenance and upkeep of the properties.

80. Harbour has consistently ignored notices sent by the City's Office of Administrative Hearings regarding civil fines for failure to maintain their properties pursuant to the Cincinnati Municipal Code ("CMC"). **Exhibit B** identifies amounts owed by Harbour for civil fines for building code, high grass, weed, and litter violations.

81. Numerous known and unknown properties owned or controlled by Harbour have been cited for failure to properly secure and barricade their properties, creating an unsafe condition. The City has borne the financial burden of securing and barricading these properties. **Exhibit C** identifies the amounts owed by Harbour for barricade costs.

82. Multiple properties owned or controlled by Harbour have been ordered uninhabitable, vacated or kept vacant. Harbour has failed to apply for and obtain Vacated Building Maintenance Licenses ("VBML") for these properties as ordered pursuant to Section 1101-77.1 of the Cincinnati Municipal Code. **Exhibit D** identifies the amounts owed by Harbour for VBML fees and late fees.

83. The failure of Harbour to maintain their properties in compliance with state and local law has caused the City to incur costs related to the abatement of weeds, litter, and high grass. **Exhibit E** identifies amounts owed by Harbour for the City's costs of abating litter, weed, or high grass violations at Harbour's properties.

84. Harbour has failed to pay invoices to Greater Cincinnati Water Works ("GCWW") for utility service to properties they currently own or formally owned. **Exhibit F** identifies delinquent amounts owed by Harbour for water and related services.

85. Harbour was repeatedly put on notice that the subject properties were not in compliance with local and state laws and purposefully, consistently and flagrantly disregarded all notices and attempts to communicate regarding the subject properties, and knowingly disregarded the foreseeable harms flowing from their willful and malicious conduct.

Existing Judgments Against Harbour

86. In addition to the active claims for money in this Complaint, the City has already attained default judgment against Harbour in previous court collections actions.

87. Those judgements are identified in **Exhibit G** to the complaint.

88. In January 2017, the City certified a judgment against Harbour High Yield Fund LLC in the amount of \$2,500 for civil fines. (CJ170000173).

89. In March 2017, the City certified a judgment against Harbour Portfolio VI LP in the amount of \$20,728.01 for delinquent water accounts and civil fines for high grass and building code violations at its blighted properties. (CJ17001340)

90. The City's existing judgments are to the detriment of the vendees currently living in Harbour properties who are in good standing under an existing land sale contract.

91. Upon information and belief, Harbour has not informed those occupants of the impact of its debts on the land sale contract, and how they cloud clean title.

LEGAL CLAIMS

COUNT I: INJUNCTIVE AND DECLARATORY RELIEF FOR FAILURE TO COMPLY WITH OHIO'S LAND SALE INSTALLMENT CONTRACT LAW Ohio Revised Code Chapters 5313 and 5301

92. The City incorporates by reference all preceding paragraphs of this Complaint.

93. Harbour has failed to comply with ORC § 5313.02(A)(10) which requires the Vendor to provide written notice of any encumbrances against the property conveyed in a land sale contract.

94. Harbour has failed to comply with ORC § 5313.02(A)(16) which requires the Vendor to provide written notice of any order of any public agency against the property.

95. For several of its land sale contracts, Harbour has failed to comply with ORC § 5313.02(C) which requires it to record a copy of the contract.

96. Harbour has failed to Comply with ORC § 5301.253 which requires the owner of any property who has received written notice of building and housing code violations to provide written notice of the violations to the purchaser or grantee prior to entering into an agreement or transferring title.

97. Harbour has made it their practice to sell and/or lease properties within the City of Cincinnati limits to vulnerable citizens who are, in some instances, unable to secure more traditional financing. Non-disclosure of code violations and unfair contract terms in these transactions has led to evictions and sometimes, loss of equity for the purchaser(s). In doing so, Harbour has continuously victimized residents of the City, cost the City substantial sums of money in building and health code enforcement, and perpetuated a vicious cycle of blight that pose a serious safety and health concern to the public.

98. The City is entitled to declaratory and injunctive relief finding that the foregoing acts, policies and practices of violate ORC Chapters 5301 and 5313.

COUNT II: CIVIL FINES FOR CODE VIOLATIONS
Cincinnati Municipal Code Chapters 714, 731, 1101 and 1501

99. The City incorporates by reference all preceding paragraphs of this Complaint.

100. Harbour repeatedly violated CMC Chapters 714, 731, 1101 and CMC §§ 1501-5, 1501-7, and 1501-9, pertaining to fines for Class B, C, and D civil offenses related to building code, weed, litter, and high grass violations at the properties as identified in **Exhibit B** to the Complaint.

101. The City provided Harbour notices of civil offense and civil fines for having weeds, litter, and/or high grass at the properties identified in **Exhibit B**.

102. These notices provided Harbour an opportunity to request an administrative hearing to contest the fine or underlying violation. Harbour did not administratively contest the validity of any of the Civil Offenses issued to it by the City.

103. Pursuant to CMC § 1501-13, the City's Class B, C and D civil offenses double if unpaid after 168 hours. Harbour civil offenses are delinquent and have all doubled from their initial amount.

104. Because Harbour failed to respond within the allowed time period to the City's notices of civil offense, by either paying the original amount, or contesting them administratively, Harbour is in default, and the civil fines owed are delinquent for the properties identified in **Exhibit A**.

105. Pursuant to CMC Chapters 714, 731, 1101 and CMC §§ 1501-5, 1501-7, and 1501-9, the amounts due from Harbour for the Civil Offenses to the properties identified in **Exhibit A** are in excess of \$215,212.50.

106. Harbour has not paid any of the amounts due. These amounts constitute a debt to the City.

COUNT III: BARRICADE COSTS
Cincinnati Municipal Code § 1101-75

107. The City incorporates by reference all preceding paragraphs of this Complaint.

108. Harbour repeatedly failed to comply with orders of the Director of Buildings and Inspections and orders of the Chief Building Official to barricade their nuisance properties, despite the City's many attempts to obtain compliance through the mailing and posting of notices of violation and notices of intent to barricade.

109. As a result of Harbour's failure to comply with the barricade orders of the City on their properties, the City was forced to take the extraordinary step of barricading the structures to protect public health, safety and welfare.

110. The costs incurred by the City to barricade Harbour's properties are identified in **Exhibit C** of the Complaint.

111. Harbour has been notified of the balances due to the City for its barricade costs at the properties identified in **Exhibit C** but has not made payment.

112. Pursuant to CMC § 1101-75.6, the amount due to the City from Harbour for its barricade costs is approximately \$6,452.32.

113. To date, Harbour has failed to tender any payment towards this balance, there this amount is past due and owing to the City.

114. These amounts constitute a debt to the City.

COUNT IV: VBML FEES AND LATE FEES
Cincinnati Municipal Code § 1101-129

115. The City incorporates by reference all preceding paragraphs of the Complaint.

116. Harbour is in violation of CMC § 1101-79, pertaining to failure to obtain a vacant building maintenance licenses (“VBML”) for Harbour properties that were ordered vacated and uninhabitable by the City.

117. Harbour has failed to apply for and obtain VBMLs for the properties identified in **Exhibit D** of the Complaint (the “VBML properties”). The City mailed notices of violation to Harbour and posted notices of violation on Harbour’s properties.

118. Pursuant to CMC § 1101-129, the amount due from Harbour for VBML licenses, including late fees, for the VBML Properties is approximately \$109,500.00.

119. Pursuant to CMC § 1101-129.3A, these amounts constitute a debt to the City.

120. To date, Harbour has failed to tender any payment for the balances owed for VBML fees and late fees at its Properties. Therefore, Harbour is past due and owing to the City in this matter.

COUNT V: PRIVATE LOT ABATEMENT COSTS
Cincinnati Municipal Code §§ 714-37, 714-45, 714-47, 731-3 and 731-11

121. The City incorporates by reference all preceding paragraphs of the Complaint.

122. Harbour repeatedly failed to comply with City orders to abate weed, high grass, and litter violations at its properties in violation of CMC §§ 714-37, 714-45, 714-47, 731-3, and 731-11.

123. As a result of Harbour's failure to comply with the weed, litter and high grass citations issued by the City for their nuisance properties, the City was forced to take the extraordinary step of cutting the high grass, destroying the weeds, and picking up trash at Harbour's properties.

124. **Exhibit E** to the complaint identifies the properties owned or controlled by Harbour that are or were in violation of CMC §§ 714-37, 714-45, 714-47, 731-3, and 731-11, and at which the City incurred private lot abatement costs.

125. Pursuant to CMC §§ 714-47 and 731-11, the amounts due for the City's weed, litter and lawn abatement activities from Harbour for the properties identified in **Exhibit E** is in excess of \$6,029.21.

126. Harbour has been notified of the amounts owed by it to the City for weed, high grass, and litter abatement costs, but it has refused to make payment.

127. To date, Harbour has failed to tender any payment towards abatement costs incurred by the City for the properties identified in **Exhibit E**. Therefore, Harbour is past due and owing to the City in this matter.

128. These amounts constitute a debt to the City.

COUNT VI: GREATER CINCINNATI WATER WORKS
Cincinnati Municipal Code § 401-95

129. The City incorporates by reference all preceding paragraphs of the Complaint.

130. Harbour has in the past and continues to, in some cases, receive water and sewer services through Greater Cincinnati Water Works ("GCWW"). Many properties currently and previously owned by Harbour have delinquent water/sewer accounts.

131. **Exhibit F** to the complaint identifies properties owned or controlled by Harbour for which there are outstanding water liabilities.

132. Pursuant to CMC § 401-95, the amount due for water/sewer services provided to Harbour for the properties identified in **Exhibit F** is in excess of \$29,700.75.

133. Harbour has been notified of this balance but has refused to make payment.

134. To date, Harbour has failed to tender complete payment toward GCWW water/sewer services for the properties identified in **Exhibit F**. Therefore, Harbour is past due and owing to the City in this matter.

135. These amounts constitute a debt to the City.

COUNT VII: PUBLIC NUISANCE – UNFIT LIVING CONDITIONS
(Ohio Revised Code Section 3767.41)

136. The City incorporates by reference all preceding paragraphs of the Complaint.

137. The Subject Properties at 1046 McPherson Avenue, 1931 Webman Court, 3171 Beekman Street and 3814 Saint Lawrence Avenue are a menace to the public health, welfare, or safety; are structurally unsafe; unsanitary; have inadequate egress; constitute a fire hazard; are otherwise dangerous to human life; are no longer fit and habitable; and are hazardous to the public health, welfare, or safety due to the Harbour's failure to maintain and/or repair the structures.

138. The City of Cincinnati is entitled under ORC § 3767.41 to an order of remedial action in its favor and against Harbour.

COUNT VIII: NUISANCE
(Common Law)

139. The City incorporates by reference all preceding paragraphs of the Complaint.

140. Harbour's business practices constitute an absolute nuisance.

141. Harbour's business practices have created and maintained a nuisances per se at their properties through violations of the Ohio Revised Code and Cincinnati Municipal Code, as well as through their failure to maintain their properties.

142. Harbour's business practices are negligent, reckless and intentional, and they significantly and unreasonably interfere with the public health, welfare, and safety in Cincinnati.

143. Harbour's business practices perpetuate the creation and maintenance of nuisance conditions at their properties, which produce a long-lasting and detrimental impact on public health, welfare, and safety in Cincinnati.

144. Harbour knows or reasonably should know that these practices have a significant negative impact on the City, its residents, and its land sale contract vendees.

145. Harbour's land sale vendees are placed into homes for which Harbour knows that there are outstanding code violations, health hazards and substandard living conditions. Vendees are "sold" these properties on an as-is basis, even though they cannot afford repairs. And they are summarily evicted when they fall behind on payments.

146. The City and its residents are subjected to the continuation of nuisance properties throughout its neighborhoods due to Harbour's investor-based pooled securities model that eschews all liability for its distressed properties by foisting maintenance onto unsophisticated consumers, or otherwise dumping those properties that it does not deem profitable at rock-bottom prices to other "investors" without disclosing known defects.

147. The City and the residents of Cincinnati have a common right to be free from such conduct.

148. Harbour's business practices which create and perpetuate nuisances at its properties have caused the City damage, including increased police, fire, health, emergency, and corrections costs for inspections and the cost of attempting to eliminate the hazard and decreased tax revenues resulting from the depreciated value of the affected homes and all surrounding real estate.

149. As a result of its creation of an absolute nuisance, Harbour is liable to the city for compensatory and punitive damages in an amount to be determined at trial; injunctive relief; costs and attorney's fees.

COUNT IX: BUILDING CODE VIOLATIONS
(Cincinnati Municipal Code Chapter 1101)

150. The City incorporates by reference all preceding paragraphs of the Complaint.

151. The Harbour defendants' properties are in violation of CMC Chapter 1101 because they are blighted and fail to comply with the requirements set forth in CMC §§ 1101-01 et seq.

152. The City is entitled to an injunction requiring the Harbour defendants' compliance with the CMC pursuant to ORC § 715.44 and CMC § 1501-26.

COUNT X: WEED AND LITTER CONTROL VIOLATIONS
(Cincinnati Municipal Code Chapters 714 and 731)

153. The City incorporates by reference all preceding paragraphs of the Complaint.

154. The Harbour defendants' properties are in violation of CMC Chapters 714 and 731 because they are overgrown and littered.

155. The City is entitled to an injunction requiring the Harbour defendants' compliance with the CMC pursuant to ORC § 715.44 and CMC § 1501-26.

COUNT XI: CIVIL CONSPIRACY

156. The City incorporates by reference all preceding paragraphs of the Complaint.

157. In connection with the underlying purchase of properties from Fannie Mae, and the subsequent marketing of and consummation of the land sale contract transaction with consumers, as well as the disposal of non-productive properties to bottom feeder investors at firesale prices, the Harbour Defendants acted with malice in concern, via a civil conspiracy, for the common goal of profiting off of the foreclosure crisis by intentionally avoiding property maintenance laws

and ORC § 5301.253 at the expense of, and to the detriment of the City and its land sale vendees.

158. The Harbour Defendants have failed to comply with ORC § 5313.02(A)(10) which requires the Vendor to provide written notice of any encumbrances against the property conveyed in a land sale contract.

159. The Harbour Defendants have failed to comply with ORC § 5313.02(A)(16) which requires the Vendor to provide written notice of any order of any public agency against the property.

160. For several of its land sale contracts, the Harbour Defendants failed to comply with ORC § 5313.02(C) which requires it to record a copy of the contract.

161. The Harbour Defendants have failed to comply with ORC § 5301.253 which requires the owner of any property who has received written notice of building and housing code violations to provide written notice of the violations to the purchaser-vendee prior to entering into an agreement or transferring title.

162. Not only did the Harbour Defendants' non-disclosure inflate the value price of the home, increasing the profit for Harbour and its investors, it also omitted known outstanding violations, most of which posed health and safety concerns for the purchaser-vendees themselves, the general public and first responders. When some of these violations escalated, the City was forced to abate the nuisances at the Harbour Defendants' properties. The expense of this malfeasance continues to be the City's burden.

163. On the one hand, the Harbour Defendants' business practices involve accepting a steady flow of cash from land sale vendees who are under existing cash-generating land sale contracts,

while simultaneously ignoring back taxes, code violations and other liabilities at its “non-desirable” properties.

164. As a result of the civil conspiracy relation amongst the Harbour Defendants, each is liable for the actions of the other as stated in Counts one through ten and which are hereby restated against each Harbour Defendant as fully set forth herein.

WHEREFORE, The City of Cincinnati requests that the Court:

- A. Enter judgment against the Harbour Defendants, jointly and severally, for payment of all unpaid fees, fines, assessments and bills and any other amounts owed pursuant to the Cincinnati Municipal Code, the Ohio Revised Code, or upon the discovery of new information, and order payment of interest and costs as permitted by law;
- B. Issue Injunctive and Declaratory Relief ordering the Harbour Defendants to timely comply with the Cincinnati Municipal Code, the Ohio Revised Code, and other applicable laws prohibiting nuisance conditions in residential properties, both now and in perpetuity;
- C. Order the Harbour Defendants to provide the City of Cincinnati with an agent for service of process within Hamilton County, Ohio, that will accept service on behalf of Harbour for any and all violations of municipal, state, or federal law;
- D. Issue Injunctive and Declaratory Relief finding Harbour’s land sale contract practices illegal and in violation of Ohio Revised Code Chapters 5313 and 5301 and prohibiting Harbour from transferring any of its “currently owned”

properties in Exhibit A until the issues in this case are resolved and/or by agreement of the parties;

E. Grant a preliminary and permanent judgment declaring the Harbour properties at 1046 McPherson Avenue, 1931 Webman Court, 3171 Beekman Street and 3814 Saint Lawrence Avenue constitute public nuisances as defined by ORC § 3767.41;

F. For an order granting a preliminary and permanent injunction requiring Harbour to abate the public nuisances forthwith pursuant to ORC § 715.44 and CMC § 1501-27 at its properties located at 1046 McPherson Avenue, 1931 Webman Court, 3171 Beekman Street and 3814 Saint Lawrence Avenue;

G. For an order appointing a receiver to abate the public nuisance if the Harbour defendants fail to abate the public nuisance at 1046 McPherson Avenue, 1931 Webman Court, 3171 Beekman Street and 3814 Saint Lawrence Avenue pursuant to ORC § 3767.41;

H. Any other injunctive relief that may arise relating to the appointment of a receiver and abatement of the public nuisance including, but not limited to, providing access to the properties for an assessment by experts to determine the financial and constructive plan needed to rehabilitate the building; and performing such work and furnishing materials necessary to comply with the code and abate the public nuisance.

I. An injunctive order for the sale of the properties 1046 McPherson Avenue, 1931 Webman Court, 3171 Beekman Street and 3814 Saint Lawrence Avenue

pursuant to ORC § 3767.41 if the receiver has abated the public nuisance and the Court determines a sale outweighs the benefit of not selling the properties;

J. For an order appointing a receiver pursuant to Ohio Revised Code Chapter 2735;

K. Award actual damages and punitive damages against all Harbour defendants, jointly and severally, in an amount to be determined at trial;

L. Awarding the City such other extraordinary, declaratory and/or injunctive relief as permitted by law or equity as necessary to assure that the City has an effective remedy;

M. Enter a finding that the Harbour Defendants have engaged in a civil conspiracy involving violations of their obligations as land sale vendees and for their failure to comply with code violations issued to the City by it for their nuisance properties;

N. For an order requiring the Harbour Defendants to pay the costs of this action, including all reasonable attorneys' fees; and

O. Award all other relief that the Court deems just and equitable.

Respectfully submitted,

PAULA BOGGS MUETHING (0080018)
CITY SOLICITOR

/s/ Jessica Powell

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Counsel for Plaintiff City of Cincinnati

JURY DEMAND

Plaintiff hereby requests a trial by jury on all matters which may be tried to a jury.

/s/ Jessica Powell

Jessica L. Powell (0073928)
Counsel for Plaintiff City of Cincinnati

Exhibit A - Harbour Properties at Issue

Address	PIN	Entity	Neighborhood	Sold To
3130 Sunshine Ave	207-0054-0029-00	Harbour Portfolio VI, LP	Westwood	Aly Koundoul
2483 Gate St	207-0A54-0159-00	Harbour Portfolio VII	Westwood	Anastasiaya Sergeyeva
1998 Harrison Ave	206-0007-0003-00	Harbour Portfolio VIII, LP	South Fairmount	Antonio Taylor
4563 Hamilton Ave	199-0041-0076-00	Harbour Portfolio VII, LP	Northside	CC REO Group LLC
3073 Bracken Woods Ln	207-0054-0112-00	Harbour Portfolio VI, LP	Westwood	CC REO Group LLC
930 Hawthorne Ave	175-0016-0215-90	Harbour Portfolio VI, LP	East Price Hill	Direct Properties LLC
836 York St	132-0002-0074-00	Harbour Portfolio VI, LP	West End	Direct Properties LLC
3616 Lasalle St	174-0008-0135-00	Harbour Portfolio VIII, LP	East Price Hill	DMP Holdings LLC
8453 Anthony Wayne Ave	245-0001-0064-00	Harbour Portfolio VI, LP	Hartwell	Eh Pooled 412 LP
720 Grand Ave	178-0027-0066-00	Harbour Portfolio VI, LP	East Price Hill	Eh Pooled 412 LP
4664 McNeil Ave	116-0003-0046-00	Harbour Portfolio VII, LP	Paddock Hills	Eh Pooled 412 LP
3741 Hillside Ave	158-0062-0080-00	Harbour Portfolio VII, LP	Riverside	Eh Pooled 412 LP
3065 Bracken Woods Ln	207-0054-0113-00	Harbour Portfolio VI, LP	Westwood	Eh Pooled 412 LP
2706 Orland Ave	206-0009-0025-00	Harbour Portfolio VI, LP	Westwood	Eh Pooled 412 LP
233-235 Forest Ave	216-0044-0169-00	Harbour Portfolio VI, LP	Avondale	Eh Pooled 412 LP
2283 Baltimore Ave	224-0002-0033-00	Harbour Portfolio VI, LP	East Westwood	Eh Pooled 412 LP
1915 Clarion Ave	058-0003-0040-00	Harbour Portfolio VI, LP	Evanston	Eh Pooled 412 LP
1877 Knox St	203-0028-0186-00	Harbour Portfolio VI, LP	South Fairmount	Eh Pooled 412 LP
1019 Winfield Ave	179-0075-0314-00	Harbour Portfolio VI, LP	West Price Hill	Eh Pooled 412 LP
8421 Dixie Ave	245-0001-0136-00	International Fund, INC	Hartwell	Felder Investments LLC
907 Rosemont Ave	179-0078-0229-00	Harbour Portfolio VII, LP	West Price Hill	Fourth Power Investments, LLC
1237 Dewey Ave	179-0074-0056-00	Harbour Portfolio VIII, LP	West Price Hill	Gloria Moore
8421 Dixie Ave	245-0001-0136-00	Harbour Portfolio VI, LP	Hartwell	Harbour Portfolio Internal Fund INC
5726 St Elmo Ave	236-0002-0033-00	Harbour Portfolio VI, LP	College Hill	Headlands Assest Management Fund
4566 Eastern Ave	016-0001-0114-00	Harbour Portfolio VI, LP	Linwood	Headlands Assest Management Fund
3065 Kerper Ave	060-0004-0102-00	Harbour Portfolio VI, LP	Walnut Hills	Headlands Assest Management Fund
1939 Hewitt Ave	054-0003-0013-00	Harbour Portfolio VI, LP	Evanston	Herb C. Morris
642 Delhi Ave	153-0002-0067-00	Harbour Portfolio VII, LP	Sedamsville	John Jones, TR
4211 Westhaven Ave	179-0075-0190-00	Harbour Portfolio VI, LP	West Price Hill	John Jones, TR
2182 Harrison Ave	206-0014-0028-00	Harbour Portfolio VI, LP	Westwood	John Jones, TR
3365 Saffer St	207-0052-0066-00	Harbour Portfolio VII, LP	Westwood	Khilfa Rah
528 W. McMicken Ave	097-0003-0043-00	Harbour Portfolio VIII, LP	CUF	Lakeside Portfolio
658 State Ave	149-0011-0380-00	Harbour Portfolio VII, LP	Lower Price Hill	Lakeside Portfolio
3023 Murdock Ave	177-0036-0018-00	Harbour Portfolio VIII, LP	East Price Hill	Lakeside Portfolio

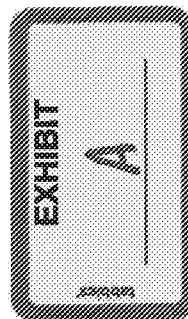


Exhibit A - Harbour Properties at Issue

1105 McPherson Ave	174-0008-0159-00	Harbour Portfolio VIII, LP	East Price Hill	Lakeside Portfolio
1029 Wells St	174-0008-0092-00	Harbour Portfolio VII, LP	East Price Hill	Lakeside Portfolio
2912 Warsaw Ave	173-0005-0108-00	Harbour Portfolio VI, LP	East Price Hill	Lonnie Horn
404 Purcell Ave	177-0035-0178-00	Harbour Portfolio II, LLC	East Price Hill	Mahmoud Morad, TR
1764 Denham St	202-0040-0106-00	Harbour Portfolio VIII, LP	North Fairmount	Momentum Enterprise
1236 Sliker Ave	179-0075-0148-00	Harbour Portfolio VII, LP	West Price Hill	Momentum Enterprise
3968 Lowry Ave	115-0003-0062-00	Harbour Portfolio VII, LP	North Avondale	MT Development
6098 Belmont Ave	228-0002-0322-00	Harbour Portfolio VI, LP	College Hill	Park Street Group
3609 Van Vey St	176-0022-0147-00	Harbour Portfolio VIII, LP	East Price Hill	Park Street Group LLC
1646 Gilsey Ave	181-0001-0124-00	Harbour Portfolio VI, LP	West Price Hill	Quentin Grandstaff
4213 Watterson St	037-0001-0213-00	Harbour Portfolio VIII, LP	Madisonville	Reliable Home Improvement & Prop
1414 Carolina Ave	117-0005-0036-00	Harbour Portfolio VII, LP	Bond Hill	Reliable Home Improvement & Prop
4018 Palos St	179-0076-0211-00	Harbour Portfolio VII, LP	West Price Hill	RIVER RUN ACA LLC
3315 Bonaparte Ave	054-0004-0105-00	Harbour Portfolio VI, LP	Evanston	RIVER RUN ACA LLC
5014 Glenshade Ave	035-0004-0118-00	Harbour Portfolio VI, LP	Madisonville	SG Capital Partners LLC
2552 Sarvis Ct	213-0002-0047-00	Harbour Portfolio VII, LP	Westwood	SG Capital Partners LLC
1309 William H Taft Rd	062-0001-0028-00	Harbour Portfolio VII, LP	East Walnut Hills	SG Capital Partners LLC
4401 Eastern Ave	024-0003-0156-00	Harbour Portfolio VII, LP	Columbia Tusculu	Summit Asset Management LLC
1910 Linn St	132-0003-0128-00	Harbour Portfolio VIII, LP	West End	Tahoe Real Estate Investments LLC
3111 Bracken Woods Ln	207-0054-0120-00	Harbour Portfolio VII, LP	Westwood	Westwood Community Urban Redevelopment Corp.
5222 Kenwood Rd	035-0004-0041-00	Harbour Portfolio VI, LP	Madisonville	WHAM Properties II LLC
131 W. 66th St	241-0002-0062-00	Harbour Portfolio VII, LP	Carthage	Shawn L. Wooten & Money Pope
Currently Owned				
922 Rosemont	179-0076-0123-00	Harbour Portfolio VI, LP	West Price Hill	Still Own
3269 Lapland Drive	510-0081-0172-00	Harbour Portfolio VI, LP	Colerain	Still Own
6650 Sheed Road	510-0223-0060-00	Harbour Portfolio VII, LP	Colerain	Still Own
136 Second St	571-0003-0142-00	Harbour Portfolio VII LP	Addyston	Still Own
7505 Abbie Pl	590-0062-0136-00	Harbour Portfolio VI LP	Springfield	Still Own
1272 Section	590-0062-0148-00	Harbour Portfolio VII LP	Springfield	Still Own
1927 Goodman Ave	595-0005-0618-00	Harbour Portfolio VI LP	North College Hill	Still Own
1924 Waltham Ave	595-0008-0370-00	Harbour Portfolio VI LP	North College Hill	Still Own
419 Arlington Ave	641-0015-0055-00	Harbour Portfolio VIII, LP	Lockland	Still Own

Exhibit A - Harbour Properties at Issue

1806 Maple Ave	651-0045-0023-00	Harbour Portfolio VI LP	Norwood	Still Own
1836 Lincoln Ave	651-0050-0168-00	Harbour Portfolio VII LP	Norwood	Still Own
4113 Huston Ave.	651-0051-0230-00	Harbour Portfolio VII LP	Norwood	Still Own
415 Maple Street	661-0001-0175-00	Harbour Portfolio VII LP	Elmwood	Still Own
36 Poplar Street	661-0002-0092-00	Harbour Portfolio VII LP	Elmwood	Still Own
202 Walnut Street	661-0002-0467-00	Harbour Portfolio VII LP	Elmwood	Still Own
320 E. Vine Street	671-0004-0298-00	Harbour Portfolio VI LP	Reading	Still Own
5725 Bramble Ave	037-0001-0120-00	Harbour Portfolio VI, LP	Madisonville	Still Own
4940 Plainville	037-0003-0459-00	Harbour Portfolio VII, LP	Madisonville	Still Own
4131 Chambers St	221-0019-0068-00	Harbour Portfolio VII, LP	Northside	Still Own
4055 Palos St	179-0076-0222-00	Harbour Portfolio VI, LP	West Price Hill	Still Own
4052 Vinedale Ave	179-0078-0434-00	Harbour Portfolio VIII, LP	West Price Hill	Still Own
3814 St Lawrence Ave	174-0006-0123-00	Harbour Portfolio VII, LP	West Price Hill	Still Own
3171 Beekman St	201-0041-0017-00	Harbour Portfolio VIII, LP	Millvale	Still Own
2564 Linden St	202-0033-0189-00	Harbour Portfolio VII, LP	North Fairmount	Still Own
1931 Webman Ct	192-0066-0027-00	Harbour Portfolio VIII, LP	Millvale	Still Own
1915 West Fork Rd	226-0005-0145-00	Harbour Portfolio VII, LP	Northside	Still Own
1866 Fairmount Ave	206-0005-0254-00	Harbour Portfolio VI, LP	South Fairmount	Still Own
1820 Colmar Ln	117-0015-0113-00	Harbour Portfolio VI, LP	Roselawn	Still Own
129 Glenridge Pl	216-0039-0262-00	Harbour Portfolio VIII, LP	Avondale	Still Own
1241 Elberon Ave	173-0002-0089-00	Harbour Portfolio VIII, LP	East Price Hill	Still Own
1235 Ross Ave	174-0005-0164-00	Harbour Portfolio VII, LP	East Price Hill	Still Own
1223 McKeone Ave	179-0077-0024-00	Harbour Portfolio VII, LP	West Price Hill	Still Own
1046 McPherson Ave	174-0008-0260-00	Harbour Portfolio VI, LP	East Price Hill	Still Own

***** This list includes all properties that Harbour owned, past or present, within the City of Cincinnati, as well as properties currently owned by Harbour in Hamilton County.***

Exhibit B - Civil Fines

Case Number	Business Name	Amount Due	Invoice Date	CMCSection	RealPropAddress
129867	HARBOUR PORTFOLIO VII LP	\$875.00	09/23/2013	731-3	1026 MCPHERSON AV
PSC1609375-01	HARBOUR PORTFOLIO VII LP	\$1,250.00	08/23/2016	731-3	1028 MCPHERSON AV
PSC1609375-02	HARBOUR PORTFOLIO VII LP	\$1,750.00	10/10/2016	731-3	1028 MCPHERSON AV
PSC1612633-01	HARBOUR PORTFOLIO VII LP	\$1,250.00	11/22/2016	714-37	1028 MCPHERSON AV
PSC1612633-02	HARBOUR PORTFOLIO VII LP	\$1,750.00	12/08/2016	714-37	1028 MCPHERSON AV
PSC1612633-03	HARBOUR PORTFOLIO VII LP	\$3,000.00	01/24/2017	714-37	1028 MCPHERSON AV
B201507197	HARBOUR PORTFOLIO VII LP	\$1,750.00	04/29/2016	Chapter 1101	1029 WELLS ST
PSC1612808-02	HARBOUR PORTFOLIO VII LP	\$1,750.00	12/15/2016	714-37	1029 WELLS ST
PSC1612808-01	HARBOUR PORTFOLIO VII LP	\$1,250.00	12/01/2016	714-37	1029 WELLS ST
PSC1612808-03	HARBOUR PORTFOLIO VII LP	\$3,000.00	01/31/2017	714-37	1029 WELLS ST
B201507197C	HARBOUR PORTFOLIO VII LP	\$3,000.00	11/03/2016	Chapter 1101	1029 WELLS ST
B201507197B	HARBOUR PORTFOLIO VII LP	\$3,000.00	08/15/2016	Chapter 1101	1029 WELLS ST
114463	HARBOUR PORTFOLIO VI LP	\$262.50	07/19/2011	714-37	1046 MCPHERSON AV
PSC1700476-01	HARBOUR PORTFOLIO VI LP	\$175.00	01/24/2017	723-5	1046 MCPHERSON AV
PSC1700476-02	HARBOUR PORTFOLIO VI LP	\$150.00	02/07/2017	723-5	1046 McPherson
HL15001190	HARBOUR PORTFOLIO VIII LP	\$875.00	04/23/2015	731-3	1105 MCPHERSON AV
PSC1500538-03	HARBOUR PORTFOLIO VIII LP	\$3,000.00	04/27/2016	731-3	1105 MCPHERSON AV
PSC1500538-04	HARBOUR PORTFOLIO VIII LP	\$3,000.00	05/25/2016	731-3	1105 MCPHERSON AV
PSC1600084-01	HARBOUR PORTFOLIO VIII LP	\$1,250.00	01/06/2016	714-37	1105 MCPHERSON AV
PSC1500538-05	HARBOUR PORTFOLIO VIII LP	\$3,000.00	10/10/2016	731-3	1105 MCPHERSON AV
B201304963C	HARBOUR PORTFOLIO VIII LP	\$3,000.00	06/29/2016	Chapter 1101	1105 MCPHERSON
PSC1500538-02	HARBOUR PORTFOLIO VIII LP	\$2,500.00	12/22/2015		1105 MCPHERSON AV
B201304963D	HARBOUR PORTFOLIO VIII LP				
	C/O INCORP SERVICES INC	\$3,000.00	10/06/2016	Chapter 1101	1105 MCPHERSON AVE
B201304963B	HARBOUR PORTFOLIO VIII LP	\$2,000.00	06/04/2014		1105 MCPHERSON AVE
B201304963	HARBOUR PORTFOLIO VIII LP				
	C/O JENNIFER D WINGARD	\$1,250.00	02/14/2014	Chapter 1101	1105 MCPHERSON AVE
134044	HARBOUR PORTFOLIO VII LP	\$437.50	10/01/2014	714-37	1223 MCKEONE AV
PSC1605754-01	HARBOUR PORTFOLIO VIII LP	\$1,250.00	06/09/2016	731-3	1235 ELBERON AV
PSC1605754-02	HARBOUR PORTFOLIO VIII LP	\$1,750.00	06/28/2016	731-3	1235 ELBERON AV
PSC1605754-03	HARBOUR PORTFOLIO VIII LP	\$3,000.00	10/28/2016	731-3	1235 ELBERON AV
PSC1605755-01	HARBOUR PORTFOLIO VIII LP	\$1,250.00	06/09/2016	731-3	1241 ELBERON AV
130954	HARBOUR PORTFOLIO VIII LP	\$875.00	04/02/2014	731-3	129 GLENRIDGE PL
PSC1611741-02	HARBOUR PORTFOLIO VIII LP	\$1,750.00	10/25/2016	714-37	129 GLENRIDGE PL
PSC1611741-01	HARBOUR PORTFOLIO VIII LP	\$1,250.00	10/11/2016	714-37	129 GLENRIDGE PL



Exhibit B - Civil Fines

PSC1611741-03	HARBOUR PORTFOLIO VIII LP	\$3,000.00	12/08/2016	714-37	129 GLENRIDGE PL
PSC1611741-04	HARBOUR PORTFOLIO VIII LP	\$3,000.00	01/25/2017	714-37	129 GLENRIDGE PL
PSC1602884-01	HARBOUR PORTFOLIO VIII LP	\$250.00	04/26/2016	731-3	129 GLENRIDGE PL
129587	HARBOUR PORTFOLIO VIII LP	\$875.00	05/15/2014	731-3	1414 CAROLINA AV
130410	HARBOUR PORTFOLIO VII LP	\$875.00	09/19/2013	731-3	1414 CAROLINA AV
B201500966	HARBOUR PORTFOLIO VII LP	\$1,750.00	10/12/2015	Chapter 1101	1414 CAROLINA AV
CC20110650	HARBOUR PORTFOLIO VII LP	\$1,250.00	08/13/2013	Chapter 1117	1414 CAROLINA AV
HL15003030	HARBOUR PORTFOLIO VII LP	\$525.00	05/15/2015	731-3	1414 CAROLINA AV
HL15005398B	HARBOUR PORTFOLIO VII LP	\$1,750.00	07/14/2015	731-3	1414 CAROLINA AV
135437	HARBOUR PORTFOLIO VII LP	\$875.00	08/27/2014	731-3	1414 CAROLINA
134018	HARBOUR PORTFOLIO VII LP	\$875.00	10/23/2014	731-3	1645 ILIFF AV
134019	HARBOUR PORTFOLIO VII LP	\$437.50	10/23/2014	714-37	1645 ILIFF AV
137094	HARBOUR PORTFOLIO VII LP	\$875.00	04/20/2015	731-3	1645 ILIFF AV
137095	HARBOUR PORTFOLIO VII LP	\$875.00	04/20/2015	714-37	1645 ILIFF AV
PSC1500652-02	HARBOUR PORTFOLIO VII LP	\$3,000.00	01/14/2016	731-3	1645 ILIFF AV
PSC1500652-03	HARBOUR PORTFOLIO VII LP	\$3,000.00	04/25/2016	731-3	1645 ILIFF AV
PSC1500652-04	HARBOUR PORTFOLIO VII LP	\$3,000.00	07/13/2016	731-3	1645 ILIFF AV
PSC1500652-05	HARBOUR PORTFOLIO VII LP	\$3,000.00	08/30/2016	731-3	1645 ILIFF AV
B201403727C	HARBOUR PORTFOLIO VII LP	\$3,000.00	11/16/2015	Chapter 1101	1645 ILIFF AV
B201403727D	HARBOUR PORTFOLIO VII LP	\$3,000.00	12/11/2015	Chapter 1101	1645 ILIFF AV
B201403727E	HARBOUR PORTFOLIO VII LP	\$3,000.00	01/27/2016	Chapter 1101	1645 ILIFF AV
B201403727F	HARBOUR PORTFOLIO VII LP	\$3,000.00	04/29/2016	Chapter 1101	1645 ILIFF AV
HL15001394	HARBOUR PORTFOLIO VII LP	\$875.00	05/01/2015	714-37	1645 ILIFF AV
HL15001398	HARBOUR PORTFOLIO VII LP	\$875.00	05/01/2015	731-3	1645 ILIFF AV
B201403727B	HARBOUR PORTFOLIO VII LP	\$3,000.00	09/03/2015	Chapter 1101	1645 ILIFF Ave
128559	HARBOUR PORTFOLIO LP	\$262.50	12/05/2013	714-9	1645 ILIFF AVE Cincinnati OH
128979	HARBOUR PORTFOLIO LP	\$262.50	02/01/2014	714-9	1645 ILIFF AVE Cincinnati OH
B201403727	HARBOUR PORTFOLIO VII LP	\$1,250.00	03/11/2015	CHAPTER 1101	1645 ILIFF Avenue
B201205709	HARBOUR PORTFOLIO VII LP	\$1,250.00	03/13/2015	Chapter 1101	1915 WEST FORK RD
PSC1609833-01	HARBOUR PORTFOLIO VIII LP	\$1,250.00	09/07/2016	731-3	1931 WEBMAN CT
PSC1609833-02	HARBOUR PORTFOLIO VIII LP	\$1,750.00	09/21/2016	731-3	1931 WEBMAN CT
HL15004894	HARBOUR PORTFOLIO VII LP	\$1,175.00	07/01/2015	731-3	3008 WESTKNOLLS LN
HL15004894B	HARBOUR PORTFOLIO VII LP	\$1,750.00	07/14/2015	731-3	3008 WESTKNOLLS LN
HL15004894C	HARBOUR PORTFOLIO VII LP	\$3,000.00	09/02/2015	731-3	3008 WESTKNOLLS LN
135798	HARBOUR PORTFOLIO VIII LP	\$875.00	06/03/2014	731-3	3609 VAN VEYST
B201401630	HARBOUR PORTFOLIO VIII LP	\$1,250.00	05/19/2014	Chapter 1101	3609 VAN VEYST
HL15007756	HARBOUR PORTFOLIO VIII LP	\$1,250.00	09/18/2015	714-37	3609 VAN VEYST

Exhibit B - Civil Fines

HL15007756B	HARBOUR PORTFOLIO VIII LP	\$1,250.00	09/29/2015	714-37	3609 VAN VEY ST
PSC1502210-01	HARBOUR PORTFOLIO VIII LP	\$1,750.00	11/13/2015	729-71 (C)(ii)	3609 VAN VEY ST
PSC1502288-01	HARBOUR PORTFOLIO VIII LP	\$1,750.00	11/18/2015	729-71 (C)(ii)	3609 VAN VEY ST
PSC1604423-01	HARBOUR PORTFOLIO VIII LP	\$1,250.00	05/17/2016	731-3	3609 VAN VEY ST
PSC1604423-02	HARBOUR PORTFOLIO VIII LP	\$1,750.00	06/01/2016	731-3	3609 VAN VEY ST
PSC1604423-03	HARBOUR PORTFOLIO VIII LP	\$3,000.00	07/14/2016	731-3	3609 VAN VEY ST
PSC1604423-04	HARBOUR PORTFOLIO VIII LP	\$3,000.00	08/31/2016	731-3	3609 VAN VEY ST
PSC1604426-01	HARBOUR PORTFOLIO VIII LP	\$3,000.00	05/17/2016	714-37	3609 VAN VEY ST
PSC1604426-02	HARBOUR PORTFOLIO VIII LP	\$1,750.00	06/01/2016	714-37	3609 VAN VEY ST
PSC1604426-03	HARBOUR PORTFOLIO VIII LP	\$3,000.00	07/14/2016	714-37	3609 VAN VEY ST
PSC1604426-04	HARBOUR PORTFOLIO VIII LP	\$3,000.00	08/31/2016	714-37	3609 VAN VEY ST
B201401630B	HARBOUR PORTFOLIO VIII LP	\$3,000.00	11/04/2015	Chapter 1101	3609 Van Antwerp
B201401630C	HARBOUR PORTFOLIO VIII LP	\$3,000.00	06/30/2016	Chapter 1101	3609 Van Antwerp
B201502048	HARBOUR PORTFOLIO VIII LP	\$1,750.00	02/18/2016	Chapter 1101	3616 LASALLE ST
129825	HARBOUR PORTFOLIO VII LP	\$875.00	09/12/2013	731-3	4018 PALOS ST
B201105428B	HARBOUR PORTFOLIO VII LP	\$3,000.00	11/04/2015	Chapter 1101	4401 EASTERN
B201105428D	HARBOUR PORTFOLIO VII LP	\$3,000.00	07/08/2016	Chapter 1101	4401 EASTERN
B201105428C	HARBOUR PORTFOLIO VII LP	\$3,000.00	04/25/2016	Chapter 1101	4401 EASTERN AV
B201401041	HARBOUR PORTFOLIO VIII LP	\$1,250.00	05/16/2014	Chapter 1117	528 W MCMICKEN AV
B201401041C	HARBOUR PORTFOLIO VIII LP	\$3,000.00	01/05/2015	Chapter 1117	528 W MCMICKEN AV
128215	HARBOUR PORTFOLIO VI LP	\$875.00	06/13/2013	731-3	5726 ST ELMO AV
B201502920	C/O JENNIFER D WINGARD	\$1,750.00	07/02/2015	Chapter 1101	6098 BELMONT AV
HL15003128	HARBOUR PORTFOLIO VI LP	\$875.00	05/21/2015	731-3	6098 BELMONT AV
HL15003128B	HARBOUR PORTFOLIO VI LP	\$1,175.00	06/03/2015	731-3	6098 BELMONT AV
hl15003128c	HARBOUR PORTFOLIO VI LP	\$3,000.00	06/26/2015	731-3	6098 BELMONT AV
HL15003476	HARBOUR PORTFOLIO VI LP	\$875.00	05/21/2015	714-37	6098 BELMONT AV
HL15003476B	HARBOUR PORTFOLIO VI LP	\$1,750.00	06/03/2015	714-37	6098 BELMONT AV
HL15003476C	HARBOUR PORTFOLIO VI LP	\$3,000.00	06/26/2015	714-37	6098 BELMONT AV
B201407738	HARBOUR PORTFOLIO VI LP	\$1,250.00	03/11/2015	ChAPTER 1101	6098 BELMONT
121635	HARBOUR PORTFOLIO VI LP	\$300.00	08/12/2014	511-31	6098 BELMONT AVE
131221	HARBOUR PORTFOLIO VII LP	\$437.50	02/05/2014	714-37	658 STATE AV
B201401678	HARBOUR PORTFOLIO VII LP	\$1,250.00	02/12/2015	ChAPTER 1101	658 STATE AV
HL15001311B	HARBOUR PORTFOLIO VII LP	\$1,250.00	05/18/2015	714-37	658 STATE AV
HL15001311C	HARBOUR PORTFOLIO VII LP	\$3,000.00	06/24/2015	714-37	658 STATE AV
HL15002590B	HARBOUR PORTFOLIO VII LP	\$1,250.00	05/18/2015	731-3	658 STATE AV
HL15002590C	HARBOUR PORTFOLIO VII LP	\$3,000.00	06/24/2015	731-3	658 STATE AV

Exhibit B - Civil Fines

PSC1500971-04	HARBOUR PORTFOLIO VII LP	\$3,000.00	04/26/2016	731-3	658 STATE AV
141538	HARBOUR PORTFOLIO VII LP	\$437.50	12/16/2014	714-37	658 STATE
HL15002590	HARBOUR PORTFOLIO VIILP	\$875.00	05/05/2015	731-3	658 STATE AV
HL15001311	HARBOUR PORTFOLIO VIILP	\$875.00	05/15/2015	714-37	658 STATE AVE
B201401678C	HARBOUR PORTFOLIO VII LP	\$2,000.00	04/17/2015	Chapter 1101	658 State Avenue
B201401678B	HARBOUR PORTFOLIO	\$1,250.00	04/17/2015	Chapter 1101	658 State Avenue
120113	HARBOUR PORTFOLIO INTERNATIONAL	\$875.00	05/14/2012	731-3	8421 Dixie Avenue
PSC1501537-04	HARBOUR HIGH YIELD FUND LLC	\$3,000.00	11/12/2015	731-3	2406 Boone Street
PSC1501537-03	HARBOUR HIGH YIELD FUND LLC	\$3,000.00	10/21/2015	731-3	2406 Boone Street
HL15007580B	HARBOUR HIGH YIELD FUND LLC	\$1,750.00	09/22/2015	731-3	2406 Boone Street
HL15007580	HARBOUR HIGH YIELD FUND LLC	\$1,250.00	09/09/2015	731-3	2406 Boone Street
131720	HARBOUR PORTFOLIO VIII LP	\$437.50	04/02/2014	714-37	129 GLENRIDGE PL
135585	HARBOUR PORTFOLIO VII LP	\$437.50	06/19/2014	714-37	658 STATE AV
135586	HARBOUR PORTFOLIO VII LP	\$875.00	06/19/2014	731-3	658 STATE AV
135597	HARBOUR PORTFOLIO VIII LP	\$875.00	06/24/2014	731-3	1105 MCPHERSON AV
131031	HARBOUR PORTFOLIO INTERNA FUND INC	\$875.00	05/05/2014	731-3	8421 DIXIE AV
122120	HARBOUR PORTFOLIO INTERNAL FUND INC	\$875.00	07/10/2013	731-3	8421 DIXIE AV
HL15005113B	HARBOUR PORTFOLIO INTERNA FUND	\$1,175.00	07/07/2015	731-3	8421 DIXIE AV
TOTAL:		\$215,212.50	**		

**** Total due for OAH fines may change
based on payments received or new
violations accrued after complaint
filing.**

Exhibit C - Barricade Costs

Case Number	Name	Amount	Issue Date	Address
BAR2011406	Harbour Portfolio VI LP	\$160.84	05/31/2011	1019 Winfield
BAR2011885	Harbour Portfolio VI LP	\$218.09	09/23/2011	233 Forest
BAR1100069	Harbour Portfolio VI LP	\$169.45	11/10/2011	233 Forest
BAR1300025	Harbour Portfolio VI LP	\$677.63	01/07/2013	3073 Bracken Woods
BAR1300162	Harbour Portfolio VI LP	\$49.50	02/06/2013	3315 Bonaparte
BAR1500098	Harbour Portfolio VI LP	\$1,004.15	02/02/2015	6098 Belmont
BAR1400214	Harbour Portfolio VIII LP	\$65.94	03/28/2014	658 State
BAR1400772	Harbour Portfolio VII LP	\$1,103.76	03/25/2015	1645 Iliff
BAR1500218	Harbour Portfolio VIII LP	\$311.34	03/25/2015	658 State
BAR1500624	Harbour Portfolio VII LP	\$800.10	09/02/2015	1645 Iliff
BAR1500610	Harbour Portfolio VIII LP	\$148.68	08/27/2015	658 State
BAR1500854	Harbour Portfolio VII LP	\$139.76	12/23/2015	1645 Iliff
BAR1100160	Harbour Portfolio VII LP	\$385.32	12/09/2011	4401 Eastern
BAR1200017	Harbour Portfolio VII LP	\$57.73	01/06/2012	4401 Eastern
BAR1200188	Harbour Portfolio VII LP	\$78.63	02/14/2012	4401 Eastern
BAR1400954	Harbour Portfolio VIII LP	\$418.23	12/18/2014	3171 Beekman
BAR1600124	Harbour Portfolio VIII LP	\$59.95	03/02/2016	3171 Beekman
BAR1600597	Harbour Portfolio VIII LP	\$128.70	12/15/2016	3171 Beekman
BAR1600386	Harbour Portfolio VIII LP	\$285.35	08/30/2016	3609 Van Vey Street
BAR1600490	Harbour Portfolio VIII LP	\$189.17	10/11/2016	658 State
TOTAL:		\$6,452.32	**	

**** Total due for barricade fees
may change based on
payments received or new
barricades performed after
complaint filing.**

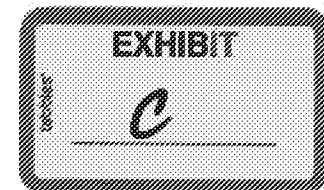


Exhibit D - Vacant Building Maintenance License Fees

Case Number	Name	Amount	Issue Date	Address
B201100860	Harbour Portfolio VI LP	\$20,200.00	02/01/2011	922 Rosemont Ave
B201203301	Harbour Portfolio VI LP	\$900.00	06/06/2012	4211 Westhaven Ave
B201502920	Harbour Portfolio VI LP	\$1,800.00	04/07/2015	6098 Belmont Ave
B201407738	Harbour Portfolio VI LP	See Above (B201502920)	01/08/2015	6098 Belmont Ave
B201001262	Harbour Portfolio VI LP	\$1,800.00	02/23/2010	720 Grand
B201404464	Harbour Portfolio VI LP	\$900.00	07/24/2014	1910 Linn
B201101142	Harbour Portfolio VI LP	\$3,600.00	02/11/2011	930 Hawthorne
B201202528	Harbour Portfolio VI LP	\$900.00	05/03/2012	1247 1st Ave
B201102076	Harbour Portfolio VI LP	\$3,600.00	04/05/2011	1019 Winfield
B201103243	Harbour Portfolio VI LP	\$4,600.00	07/18/2011	3073 Bracken Woods
B201104032	Harbour Portfolio VI LP	\$1,800.00	08/09/2011	2182 Harrison

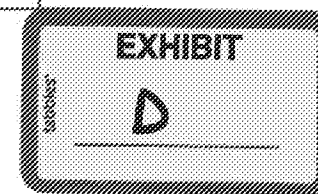


Exhibit D - Vacant Building Maintenance License Fees

B201104448	Harbour Portfolio VI LP	\$1,800.00	09/09/2011	233 Forest
B201104947	Harbour Portfolio VI LP	\$3,600.00	11/01/2011	3315 Bonaparte Ave
B201105059	Harbour Portfolio VI LP	\$1,800.00	09/27/2011	3065 Bracken Woods
B201201510	Harbour Portfolio VI LP	\$900.00	03/06/2012	1915 Clarion
B201202012	Harbour Portfolio VI LP	\$900.00	04/16/2012	2283 Baltimore
B201401678	Harbour Portfolio VII LP	\$7,300.00	03/17/2014	658 State
B201403727	Harbour Portfolio VII LP	\$4,600.00	09/11/2014	1645 Iliff
B201105525	Harbour Portfolio VII LP	\$1,800.00	10/26/2011	642 Delhi
B201203951	Harbour Portfolio VII LP	\$4,600.00	07/03/2012	1236 Sliker
B201105428	Harbour Portfolio VII LP	\$15,700.00	10/24/2011	4401 Eastern
B201205823	Harbour Portfolio VII LP	\$900.00	11/09/2012	3111 Bracken Woods
B201206612	Harbour Portfolio VII LP	\$3,600.00	12/09/2012	4563 Hamilton
B201507197	Harbour Portfolio VII LP	\$1,800.00	12/04/2015	1029 Wells
B201304963	Harbour Portfolio VIII LP	\$8,300.00	09/05/2013	1105 McPherson
B201401630	Harbour Portfolio VIII LP	\$7,300.00	03/10/2014	3609 Van Vey
B201502048	Harbour Portfolio VIII LP	\$1,800.00	09/21/2015	3616 Lasalle

Exhibit D - Vacant Building Maintenance License Fees

B201205709	Harbour Portfolio VII LP	\$2,700.00	11/05/2012	1915 West Fork
TOTAL:		\$109,500.00	**	

*** Total due for VBML may
change based on payments
received or new orders
issued after complaint
filing.*

Exhibit E - Private Lot Abatement Costs

Case Number	Name	Amount	Issue Date	Address
PSCL140301	Harbour Portfolio VIII LP	\$457.50	04/22/2014	129 Glenridge Place
PSCL140302	Harbour Portfolio VII LP	\$162.66	04/22/2014	129 Glenridge Place
PSA1500806	Harbour Portfolio VIII LP	\$343.30	10/16/2015	658 State
PSA1500807	Harbour Portfolio VIII LP	\$277.66	10/16/2015	658 State
PSA1500567	Harbour Portfolio VII LP	\$324.88	10/16/2015	3008 Westknolls
PSA1500568	Harbour Portfolio VII LP	\$259.84	10/16/2015	1414 Carolina
PSA1600072	Harbour Portfolio VII LP	\$406.93	01/14/2016	1645 Iliff
PSA1600013	Harbour Portfolio VIII LP	\$310.66	01/06/2016	1105 McPherson
PSA1602485	Harbour Portfolio VII LP	\$861.25	09/09/2016	1645 Iliff
PSA1603361	Harbour Portfolio VII LP	\$498.00	09/28/2016	3008 Westknolls
PSA1602417	Harbour Portfolio VIII LP	\$730.51	10/24/2016	1105 McPherson
PSA1602838	Harbour Portfolio VIII LP	\$1,257.51	10/27/2016	3609 Van Vey Street
PSA1602839	Harbour Portfolio VIII LP	\$138.51	10/27/2016	3609 Van Vey Street
TOTAL:		\$6,029.21	**	

**** Total due for lot abatement
may change based on payments
received or services performed
after complaint filing.**

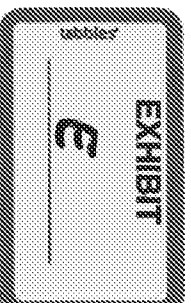


Exhibit F - Greater Cincinnati Water Works Services

Person ID	Account ID	Name	Property Address	Current Balance
0254910000	3377110000	HARBOUR PORTFOLIO VII LP	1029 WELLS ST	\$443.23
0254910000	3816600000	HARBOUR PORTFOLIO VII LP	404 LOMBARDY ST	\$146.76
0254910000	3829010000	HARBOUR PORTFOLIO VII LP	658 STATE AVE	\$428.20
0254910000	5547500000	HARBOUR PORTFOLIO VII LP	2535 ST ALBANS ST	\$416.65
0254910000	7871110000	HARBOUR PORTFOLIO VII LP	1223 MCKEONE AVE	\$96.83
0254910000	8962700000	HARBOUR PORTFOLIO VII LP	528 W MCMICKEN AVE	\$391.58
0254910000	9621110000	HARBOUR PORTFOLIO VII LP	1645 ILIFF AVE	\$428.94
1702810000	0242300000	HARBOUR PORTFOLIO VI LP	235 FOREST AVE	\$87.02
1702810000	0318800000	HARBOUR PORTFOLIO VI LP	6098 BELMONT AVE	\$637.75
1702810000	0843600000	HARBOUR PORTFOLIO VI LP	8421 DIXIE AVE	\$526.58
1702810000	0968200000	HARBOUR PORTFOLIO VI LP	1013 FORAKER AVE	\$221.62
1702810000	1648200000	HARBOUR PORTFOLIO VI LP	1309 WM HOWARD TAFT	\$489.64
1702810000	1704100000	HARBOUR PORTFOLIO VI LP	6126 BRAMBLE AVE	\$630.91
1702810000	2666200000	HARBOUR PORTFOLIO VI LP	3315 BONAPARTE AVE	\$127.39
1702810000	3045800000	HARBOUR PORTFOLIO VI LP	1615 GOODMAN AVE	\$6,921.20
1702810000	3500110000	HARBOUR PORTFOLIO VI LP	1230 ELBERON AVE	\$357.13
1702810000	3570600000	HARBOUR PORTFOLIO VI LP	7505 ABBIE PL	\$281.29
1702810000	3960900000	HARBOUR PORTFOLIO VI LP	1915 WEST FORK RD	\$98.58
1702810000	4553100000	HARBOUR PORTFOLIO VI LP	5725 BRAMBLE AVE	\$1,227.33
1702810000	4677210000	HARBOUR PORTFOLIO VI LP	836 YORK ST	\$124.29
1702810000	4970600000	HARBOUR PORTFOLIO VI LP	1272 SECTION RD	\$1,019.72
1702810000	5412900000	HARBOUR PORTFOLIO VI LP	2564 LINDEN ST	\$200.46
1702810000	5586900000	HARBOUR PORTFOLIO VI LP	3744 BANK CT	\$24.19
1702810000	6030110000	HARBOUR PORTFOLIO VI LP	1235 ROSS AVE	\$4,860.51
1702810000	6077110000	HARBOUR PORTFOLIO VI LP	1046 MCPHERSON AVE	\$981.39
1702810000	6087100000	HARBOUR PORTFOLIO VI LP	4940 PLAINVILLE RD	\$756.61
1702810000	6534020000	HARBOUR PORTFOLIO VI LP	5344 HILLSIDE AVE	\$176.44
1702810000	6631110000	HARBOUR PORTFOLIO VI LP	1646 GILSEY AVE	\$574.23
1702810000	6713900000	HARBOUR PORTFOLIO VI LP	3008 WESTKNOLLS LN	\$112.37
1702810000	7199220000	HARBOUR PORTFOLIO VI LP	2310 ROBIN AVE	\$310.76
1702810000	7738110000	HARBOUR PORTFOLIO VI LP	3814 ST LAWRENCE AVE	\$187.41

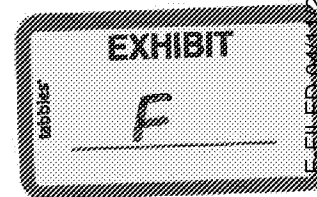


Exhibit F - Greater Cincinnati Water Works Services

1702810000	7822810000	HARBOUR PORTFOLIO VI LP	3269 LAPLAND DR	\$277.38
1702810000	8106600000	HARBOUR PORTFOLIO VI LP	415 MAPLE ST	\$75.36
1702810000	8134210000	HARBOUR PORTFOLIO VI LP	4055 PALOS ST	\$91.77
1702810000	8442600000	HARBOUR PORTFOLIO VI LP	1414 CAROLINA AVE	\$103.82
1702810000	8505300000	HARBOUR PORTFOLIO VI LP	2406 BOONE ST	\$597.26
1702810000	9334700000	HARBOUR PORTFOLIO VI LP	4131 CHAMBERS ST	\$79.73
1838120000	0904210000	HARBOUR PORTFOLIO VIII LP	4052 VINEDALE AVE	\$261.58
1838120000	4721900000	HARBOUR PORTFOLIO VIII LP	3171 BEEKMAN ST	\$300.12
1838120000	8003600000	HARBOUR PORTFOLIO VIII LP	204 WALNUT ST	\$73.94
1838120000	9198110000	HARBOUR PORTFOLIO VIII LP	3609 VAN VEY ST	\$1,304.64
1838120000	9500110000	HARBOUR PORTFOLIO VIII LP	1241 ELBERON AVE	\$349.33
1838120000	9911900000	HARBOUR PORTFOLIO VIII LP	1931 WEBMAN CT	\$350.24
1838120000	9962900000	HARBOUR PORTFOLIO VIII LP	1998 HARRISON AVE	\$80.44
4039910000	2406800000	HARBOUR PORTFOLIO VII LP	1714 STERLING AVE	\$205.51
4039910000	5903600000	HARBOUR PORTFOLIO VII LP	36 POPLAR ST	\$800.66
5652020000	4767110000	HARBOUR PORTFOLIO VIII LP	1105 MCPHERSON AVE	\$418.68
5652020000	5751110000	HARBOUR PORTFOLIO VIII LP	1237 DEWEY AVE	\$291.41
5652020000	9979110000	HARBOUR PORTFOLIO VIII LP	3023 MURDOCK AVE	\$261.13
6676810000	1281000000	HARBOUR PORTFOLIO VII LP	4401 EASTERN AVE	\$309.60
7482220000	1467110000	HARBOUR PORTFOLIO VIII LP	3616 LASALLE AVE	\$181.14
TOTAL:				\$29,700.75

**

**** Total due for water services may change based on payments received or updated balances accrued after complaint filing.**

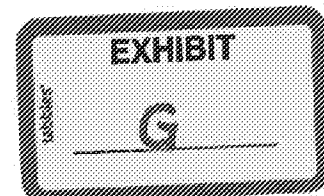


Exhibit G - Judgments

Case Number	Business Name	Amount Due	Invoice Date	CMCSection	RealPropAddress
108958	HARBOUR PORTFOLIO VI LP	\$437.50	05/03/2012	714-37	1019 WINFIELD AV
112866	HARBOUR PORTFOLIO VI LP	\$875.00	05/03/2012	731-3	1939 HEWITT AV
112867	HARBOUR PORTFOLIO VI LP	\$437.50	05/03/2012	714-37	1939 HEWITT AV
116025	HARBOUR PORTFOLIO VI LP	\$875.00	10/05/2011	731-3	2182 HARRISON AV
119736	HARBOUR PORTFOLIO VI LP	\$875.00	04/17/2012	731-3	6098 BELMONT AV
119748	HARBOUR PORTFOLIO VI LP	\$875.00	04/18/2012	731-3	233 FOREST AV
119749	HARBOUR PORTFOLIO VI LP	\$437.50	04/18/2012	714-37	233 FOREST AV
119791	HARBOUR PORTFOLIO VI LP	\$875.00	04/19/2012	731-3	1915-17 CLARION AV
119889	HARBOUR PORTFOLIO VI LP	\$875.00	04/19/2012	731-3	1247 1ST AV
122812	HARBOUR PORTFOLIO VI LP	\$437.50	09/25/2012	714-37	1939 HEWITT AV
125242	HARBOUR PORTFOLIO VI LP	\$875.00	07/17/2012	731-3	3073 BRACKEN WOODS LN
125974	HARBOUR PORTFOLIO VI LP	\$875.00	06/07/2012	731-3	2283 BALTIMORE AV 3073 BRACKEN WOODS LN
126737	HARBOUR PORTFOLIO VI LP	\$437.50	01/30/2013	714-37	LN
B201101142	CHARLES VOSE	\$1,250.00	08/10/2011	Chapter 1101	930 HAWTHORNE AVE
B201101142B	HARBOUR PORTFOLIO VI LP	\$2,500.00	02/02/2012	Chapter 1101	930 HAWTHORNE AVE
B201102076	HARBOUR PORTFOLIO VI LP	\$1,250.00	02/16/2012	Chapter 1101	1019 WINFIELD AVE
B201103803	C/O CHARLES A VOSE III, AG	\$1,250.00	01/24/2012	Chapter 1117	4211 WESTHAVEN AVE
B201106204	HARBOUR PORTFOLIO VI LP	\$1,250.00	05/29/2012	Chapter 1101	233 FOREST
B201205710	HARBOUR HIGH YIELD FUND	\$1,250.00	01/30/2014	Chapter 1101	1013 Foraker
B201103627	HARBOUR HIGH YIELD FUND LLC	\$1,250.00	12/12/2011	Chapter 1101	1611 First Avenue
B201404660B	C/O CHARLES A VOSE III	\$2,500.00	12/09/2014	Chapter 1117	6098 BELMONT AV
BC20120065	C/O KIM ALMASSRI	\$1,250.00	04/12/2012	Chapter 1101	1019 WINFIELD AVE
B201404660	C/O CHARLES A VOSE III	\$1,250.00	10/23/2014	Chapter 1117	6098 BELMONT AV
TOTAL:		\$24,187.50	**		

** Total due for judgments may
change based on payments received.