# Hearing on Rescission of March 2025 Tax Sale

**Subject Property:** 

Parcel #360-180-30 suffix 02 33.3% Undivided Interest

> **Petitioner:** Juan R. Sandoval

**Date:** July 08, 2025

#### Subject Property Image From Parcel Quest – Open Land

APN 360-180-30-02 described as "**14.81 AC Par In Por Lot 11 Rico Colony**" – this is an open land.





# Overview

#### > Previous Assessee and Party of Interest:

- > Michel Jose & Marisol
  - > owned 66.7% of undivided Interest
- > Sandoval Juan R & Gudelia G.
  - $\succ$ owned 33.3% undivided Interest

#### > Petitioner:

- Juan R. Sandoval, identified himself as the 33.3% Joint-Owner alleged the following:
  - 1) Failed to be given proper notices
  - 2) Lack of due process

#### > Purchaser:

> Michel Jose

#### > Tax Collector will present

> That all statutory processes were followed, which satisfies due process

# Context

- > California Civil Code § 683, undivided co-ownership means all owners have rights to the entire property, and such interests can be structured as a joint tenancy, where each individual holds an equal right to the whole property.
- Undivided Interest Bill Segregation starting with Revenue & Taxation Code 2821 through 2827.
  - $\geq$  Parcel is not split
  - Allows each owner to be billed separately for their portion of the property taxes

#### The 33.3% Undivided Interest, 360-180-30 suffix 02, Brief History

➢ Mr. Jose Michel has been requesting that the bills be split according to percentage of ownership since October 6, 2017.

- ≻ The bill was split into two
  - $\geq 66.7\%$  to Michel Jose & Marisol
    - Suffix designation: 360-180-30 suffix 01

> 33.3% to Sandoval Juan R & Gudelia G.

Suffix designation : 360-180-30 suffix 02

- The first default of the 33.3% (suffix 02) to Mr. Sandoval Juan R & Gudelia G. started on 06/28/2019.
  - Each year after 360-180-30 suffix 02 (33.3%) continue to be unpaid.
  - > It then became subject to the Tax Collector's Power to Sell. Recorded Notice of Power to Sell

**≻ July 15, 2024** – Doc# 2024-0062291

## Mailing Addresses for 2017 through 2024

#### APN 360-180-30 suffix 01 – Michel Jose & Marisol

- Fiscal Years 2017 through 2023
  - 8131 S Frankwood Reedley, CA 93654
- Fiscal Years 2023 through 2024
  - 1165 E Manning, Reedley, CA 93654

#### APN 360-180-30 suffix 02 – Sandoval Juan R & Gudelia G

Fiscal Years 2017 through 2024

• 20231 E Clayton, Reedley, CA 93604

#### Claim #1

Petitioner claims that he "did not receive notice of the proposed tax sale as required by California Revenue and Taxation Code [section] 3361 and 3701."

#### Claim #2

Petitioner claims that he "had no knowledge that [his] property was scheduled for sale and was deprived of any meaningful opportunity to redeem the property or participate in the process, resulting in a loss of ownership without proper due process."

# Responding to Claim #1 & 2

On the following slide 10 through slide 22 are the efforts our office made to notify all Parties of Interest and satisfy the Statutory Notice requirements of California Revenue Taxation Code 3361.

These are:

- Certified Mailing of Impending Power to Sell Notice
- Publication of Impending Power to Sell Notice
- Recording Notice of Power to Sell
- Conducting Search for Parties of Interest
- Certified Mailing Out Notice of Tax Sale to all Parties of Interest
- Publishing Notice of Public Auction
- Conducting Skip Tracing of Returned Notice of Tax Sale

# CA Revenue and Taxation Code 3701

- Revenue and Taxation Code Section 3701(b):
  - "The tax collector shall make a reasonable effort to obtain the last name and last known mailing address of parties of interest."
  - The Tax Collector's reasonable effort included:
    - Utilizing 3<sup>rd</sup> party vendor to find the last name and last known mailing address of parties of interest.
    - Should a letter from the initial mailing is returned, **internal** skip tracing is conducted:
      - Using the Property Tax System to find names and addresses that could be linked
      - Looking at property tax payment records
      - Using Google and other search engines
      - Utilizing Recorder's system to search for new recorded document
      - Skip Trace using Lexus Nexus
      - DMV system
      - Court's Odessey system
      - Bankruptcy PACER

# Notice of Tax Collector's Impending Power to Sell

- On **June 4, 2024**, The recipient **received** the notice and was signed for.
  - The assessed owners and the address on record
  - 1165 E Manning



# Notice of Tax Collector's Impending Power to Sell

• Publication of the Notice of Power and Intent to Sell all property that will be Tax Defaulted was published on the following date: May 31, June 7, and June 14, 2024.

> 360-180-30 02, \$12,531.71, MICHEL JOSE & MARISOL, SANDOVAL JUAN R & GUDELIA G; APN 363-090-55, \$1,252.77, MT VIEW CONGREGATION JEHOVAHS WITNESSES, 8254 S FRANKWOOD RE; APN 363-120-42,

FRIDAY, MAY 31, 2024 www.thebusinessjournal.cor

MISCELLANEOUS	PROPER 30, 2016
Continued   From 22	AND C

# FRIDAY, MAY 31, 2024 www.thebusinessiournal.co SELL FAX.DEEALETED DRODERTY NTUA CREEP TCE TO CREDITORS OF HUND? LAST 6104 610511 C C \ Journal on May

#### PUBLIC NOTICES 21

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# Notice of Power to Sell Tax-Defaulted Property

- On **July 15, 2024**, Tax Collector's Office recorded the Notice of Power to Sell Tax-Defaulted Property.
- Document # 2024-0062291



# Party of Interest Search Results

- Mail Certified Log
  - Showing 25 letters being mailed out to Parties of Interest for APN 360-180-30

APN	ITEM NO 🖓	Date Mailed 🖂	PINAME	PIADDRESS1	PIADDRESS2	PI CITY	~ PI \$ ~	PI ZIP 🗸 GROUP 🗸	P/O ARTICLE NO.		Page ~	RECEIVE	RETURNE
360-180-30	206		MICHEL JOSE & MARISOL	1165 E MANNING		REEDLEY	CA	93654 POI	9589 0710 5270 1503 4682		163	X	
360-180-30	200		SANDOVAL JUAN R	20231 CLAYTON AVE		Reedley	CA	93654-9417 POI	7020 0640 0001 0262	6295	164		х
360-180-30	206		SANDOVAL GUDELIA G	20231 CLAYTON AVE		Reedley	CA	93654-9417 POI	7020 0640 0001 0262	6301	164		x
360-180-30	206		MICHEL JOSE	9131 S FRANKWOOD AVE		Reedley	CA	93654 POI	7020 0640 0001 0262		164		х
360-180-30	206		MICHEL MARISOL	9131 S FRANKWOOD AVE		Reedley	CA	93654 POI	7020 0640 0001 0262	6325	164		x
360-180-30	206	1/13/2025	DEPARTMENT OF CHILD SUPPORT SERVICES	C/O FAMILY SUPPORT DIVISION	PO BOX 12946	FRESNO	CA	93779 POI	7020 0640 0001 0262	6332	164	х	
360-180-30	206	1/13/2025	DEPARTMENT OF CHILD SUPPORT SERVICES	C/O DEPARTMENT OF CHILD SUPPORT SERVICES	2220 TULARE ST 310P	FRESNO	CA	93721-2131 POI	9589 0710 5270 1503 4682	64	164		
360-180-30	206	1/13/2025	DEPARTMENT OF CHILD SUPPORT SERVICES	PO BOX 989067		WEST SACRAME	NTI CA	95798 POI	9589 0710 5270 1503 4682	88	165	X	
360-180-30	206	1/13/2025	VELOCITY INVESTMENTS LLC	C/O LAW OFFICE OF CURTIS O BARNES	390 W CERRITOS AVE	Anaheim	CA	92805 POI	9589 0710 5270 1503 4682	95	165		x
360-180-30	206	1/13/2025	CAPITAL ONE BANK USA	C/O HUNT & HENRIQUES	151 BERNAL RD 8	San Jose	CA	95119 POI	9589 0710 5270 1503 4683	01	165	Х	
360-180-30	206	1/13/2025	DEPARTMENT OF CHILD SUPPORT SERVICES	PO BOX 12946		FRESNO	CA	93779 POI	9589 0710 5270 1503 4683	18	165	X	
360-180-30	206	1/13/2025	DEPARTMENT OF CHILD SUPPORT SERVICES	PO BOX 989067		WEST SACRAME	NTI CA	95798 POI	9589 0710 5270 1503 4683	25	165	Х	
360-180-30	206	1/13/2025	CALIFORNIA STATE FRANCHISE TAX BOARD	C/O SPECIAL PROCEDURES SECTION	PO BOX 2952	SACRAMENTO	CA	95812-2952 STATE		6993	246	X	
360-180-30	206	1/13/2025	FRESNO COUNTY	C/O DEPARTMENT OF CHILD SUPPORT SERVICES	2220 TULARE ST 310P	FRESNO	CA	93721-2131 FRESNO COUNTY		7228	250	Х	
360-180-30	206	1/13/2025	FRESNO COUNTY PUBLIC WORKS	C/O DEPARTMENT OF PUBLIC WORKS	2220 TULARE STREET 6TH FLOOR	FRESNO	CA	93721 FRESNO COUNTY		7235	250	X	
360-180-30	206	1/13/2025	FRESNO COUNTY	C/O FAMILY SUPPORT	PO BOX 12946	FRESNO	CA	93779 FRESNO COUNTY		7303	251	X	
360-180-30	206	1/13/2025	FRESNO COUNTY	PO BOX 989067		WEST SACRAM	ENCA	95798 FRESNO COUNTY		7310	252	X	
360-180-30	206	1/13/2025	FRESNO COUNTY TAX COLLECTOR	PO BOX 1192		FRESNO	CA	93715-1192 FRESNO COUNTY	Received by Chief, S. Lonh			X	
360-180-30	206	1/27/2025	INTERNAL REVENUE SERVICE	ATTN: ADVISORY GROUP MANAGER	1301 CLAY STREET, STE 1400S	OAKLAND	CA	94612 IRS LIEN	9589 0710 5270 1503 4686	22	256	X	
360-180-30	206	2/3/2025	VELOCITY INVESTMENTS LLC	C/O LAW OFFICE OF CURTIS O BARNES	PO BOX 1390	Anaheim	CA	92815 SKIP TRACING	7020 0640 0001 0261	8771	291		х
360-180-30	206	2/3/2025	VELOCITY INVESTMENTS LLC	C/O LAW OFFICE OF CURTIS O BARNES	501 E KA PALMA AVE STE. 120	ANAHEIM	CA	92807 SKIP TRACING	7020 0640 0001 0261	8788	291		х
360-180-30	206	2/25/2025	SANDOVAL GUDELIA G	1237 1/4 N FAIRFAX AVE		WEST HOLLYW	OC CA	90046 SKIP TRACING	7020 0640 0001 0261	7071	392		×
360-180-30	206	2/25/2025	SANDOVAL JUAN R	289 N L STREET		DINUBA	CA	93618 SKIP TRACING	7020 0640 0001 0261	7088	392		
360-180-30	206	2/25/2025	SANDOVAL JUAN R	1165 E MANNING		REEDLEY	CA	93654 SKIP TRACING	7020 0640 0001 0261	7095	392	Х	
360-180-30	206	3/17/2025	VELOCITY INVESTMENTS LLC	C/O LAW OFFICE OF CURTIS O BARNES	4501 E LA PALMA AVE STE 120	Anaheim	CA	92807 SKIP TRACING	7020 0640 0001 0262	1740	454	X	

### **Party of Interest Notices for March 2025** Tax Sale – Initial Mailing

- Notice to Parties of Interest sent to
- Sandoval Juan R & Sandoval Gudelia G mailing address:
  - 20231 Clayton Ave, Reedley CA 93654-9417

January 13, 2025 SANDOVAL JUAN R 20231 CLAYTON AVE Reedley CA 93654-9417 January 13, 2025 SANDOVAL GUDELIA G 20231 CLAYTON AVE Reedley CA 93654-9417



## **Party of Interest Notices for March 2025** Tax Sale – Initial Mailing

- USPS Mail Log
  - mailed 2 letters to the address 20231 Clayton Ave Reedley CA 93654-9417

Jame and Address of	ng/Article Number	Adult Signature Restricted Delivery Adult Signature Restricted Delivery Cortified Mail Cortified Mail Restricted Delivery Collect on Delivery (COD)	Priority Mail Express Registered Mail Return Receipt for Merchandise Signature Confirmation Restricted Delivery	(for Po:	r addition:	np Here al copies c rith Date c	of this receipt) of Receipt.		Firm M					coun		11/12
		206 Sandoval Juan	P	Postage	·(Extra Service) Fee	Handling Charge	Actual Value if Registered	Insured Value	Due Sender if	ASR Fee	ASRD Fee	RD Fee	RR Fee	SC Fee	SCRD Fee	SH Fee
020004	0 0001 0262		VE						COD							
	10295	+ 206	-	-												
		SANDOVAL GUDEI 20231 CLAYTON A		-												
	6301	Reedley CA 93654-9 206														
		MICHEL JOSE 9131 S FRANKWOOD														
	0318	Reedley CA 93654	4 _	1												
	6395	206 MICHEL MARIS 913 I S FRANK WOO Reedley CA 936	DAVE -	-												
	6330	206 Department of Child Services C/O Family Support E		-												
589 071	05270,	PO BOX 12946 FRESNO CA 9377	9													
150;	3 41682 64	206		-												
		DEPARTMENT OF CHILD S SERVICES C/O DEPARTMENT OF CHILI						STAF	RESNO	CA O						
		SERVICES 2220 TULARE ST 31	0P	ļļ						NE T	2)					
	-						MIC CE	16. a. j.	13 6	6- /	1					
Number of Pieces	Total Number of Pieces Received at Post Office	Postmaster, Per (Name of receiv	ring employee)	I			6		US	2 2 <sup>0</sup>						

Slide

## **Party of Interest Notices for March 2025** Tax Sale – Initial Mailing



- These two notices were returned on February 3, 2025, as "Return to Sender – Unclaimed – Unable to Forward"
- 20231 Clayton Ave., Reedley CA 93654, is the address of the Petitioner on his Petition.
- Skip tracing was done, and three different addresses were found.

#### **Notice of Public Internet Auction Published on Business Journal**

- Published on
  - February 5, 2025 •
  - February 12, 2025 •
  - and February 19, 2025

#### (1)

NOTICE OF PUBLIC INTERNET AUCTION ON MARCH 27-28, 2025 OF TAX-DEFAULTED PROPERTY FOR DELINOUENT TAXES (Notice pursuant to Section 3702, Revenue and Taxation Code) On December 17th, 2024, I. Oscar J. Garcia, CPA, Fresno County Tax

SAIF: ITEM # 206, APN: 360-180-30-02. MIN BID: \$19,800.00, LAST ASSESSEE: MICHEL JOSE & MARISOL, SANDOVAL JUAN R & GUDELIA G: ITEM # 208, APN: 368-202 14 MIN DID. \$14 000 00 1 AST executive office of the seller is: same

As listed by the seller, all other business names and addresses used by date such list was sent or delivered to the huyer are: nome The names and business addresses of City of Fresho 747 R Street, 2nd Floor Fraum, CA 93721

Fresno, CA 93721 The assets to be sold are described in general as: All stock in trade, fixtures and equipment and are located at: 1538 North Blackstone Ave, Fresno, CA 93703

1538 North Blackstone Ave, Freems, The builds see and by the selfer at that location in: E-Z Haul Ready The anticentiated attact of the built between the selfer at the selfer of the selfer self self self self self referency 24, 2023 at the office of Theory batter 101. Bakerstricht (CA 93311) This built self is subject to California 0006.2. Bakerstricht warden and address of the person with whom claims may be field is ablate Faster The Company Bakerstricht, CA 93311, and the last of the person with whom claims may be field is ablate Faster The Company Bakerstricht, CA 93311, and the last de for fing claims shall be February before the sale as excetted the ve-undersigned have executed this deman.

below. City of Fresno, a California municipal corporation S/ By: Georgeanne A. White, City

2/5/25 CNS-3891732# FRESNO BUSINESS JOURNAL 02/05/2025

NOTICE TO CREDITORS OF BULK

(SECS. 6104, 6105 U.C.C.) ESCROW NO. P-651302 ESCROW NO."P. estigo: " Notice is hereby given to reditors bulk sale is about to be made of the sasts described below. The names and sasts described below. The names and Navject Singh Chahal 780 Gettysburg verme. Clovis, CA 93612 of the chief executive office of the seller is: (If "aamo as above", so state.) same as

above As listed by the seller, all other business names and addresses used by the seller within three years before the date such list was sent or delivered to the buyer are: (if "none", so state.) SUPER SAVE 1385 We Shaw Avenue, Covis, CA 54 dates of the Buyer

Clovis, CA 93612 The names and addresses of the Buyer are: BEAL DEVELOPMENTS LLC, a California Limited Linbility Company 1175 Shaw Avenue #104, PMB 372, Clovis, CA 93612

The second secon

BUYER: BEAL DEVELOPMENTS LLC /S/ By: George J. Beal, Managing Member /S/ By: Sterlene J. Beal, Managing Member

Member 2/5/25 CNS-3891590# FRESNO BUSINESS JOURNAL 02/05/2025

(1) NOTICE OF PUBLIC INTERNET AUCTION ON MARCH 27-28, 2025 OR DELINGUENT TAXES (Notice pursuant to Section 3702, Revenue and Taxation Code) On December 17th, 2024, I, Oscar I, Garcia, CPA, Fresno County Tax

Collector, was directed by the Board of Supervisors of Freino County, California, by its Resolution No. 24-388, to conduct a public auction of tax-defaulted real property. The tax-defaulted properties being offered for sale are subject to the tax collector's power of sale.

Chen, Torus, Dy, Li, Agraditteria, NG, 2-4 ins, Adefaulted real property. The tax instance of the internet and internet internet and internet and internet internet and internet inthe anomena internet and internet internet and

New York and the second second

# Skip Tracing for New Addresses for **Party of Interest Notices**

- On 02/25/25 three (3) additional letters were mailed from addresses found from Skip Tracing
  - Sandoval Gudelia G:
    - 1237 ¼ N Fairfax Ave West Hollywood CA 90046
  - Sandoval Juan R:
    - 289 N L Street Dinuba CA 93618
    - 1165 E Manning Reedley CA 93654

APN	ITEM NO	Dat	te Mailed	PINAME					PIADDR	RESS1	
360-180-30		206	2/25/202	5 SANDOVA	L GUE	DELIA G			1237	1/4 N FAIR	RFAX AVE
360-180-30		206	2/25/202	5 SANDOVA	LJUA	NR			289 1	N L STREET	
360-180-30		206	2/25/202	5 SANDOVA	LJUA	NR			1165	E MANNING	
PIADDRESS2			PI CITY	PI STAT PI ZIP	-	GROUP	P/O ARTICLE NO.		Page #	RECEIVED	RETURNED
PIADDRESS2			PI CITY WEST HOLLYWO			GROUP	P/O ARTICLE NO. 7020 0640 0001 0261	7071		RECEIVED	RETURNED
PIADDRESS2					90046		7020 0640 0001 0261	7071 7088	392	RECEIVED	

## **Party of Interest Notices** Skip Tracing for New Addresses to Mail Out

POSTAL SERVICE •						F	lrm Ma	lling	Bool	k Fo	Aco	oun	table	Mall
Name and Address of Sender	Check type of mail or service Adult Signature Required Adult Signature Restricted Delivery Certified Mail Restricted Delivery Certified Mail Restricted Delivery Coltect on Delivery (COD) Insured Mail Priority Mail Signature Confirmation Restricted Delivery	(for		coples o	f this receipt). f Receipt.									
USPS Tracking/Article Number	Addresses (Name, Street, City, State, & ZiP Code <sup>Tw</sup> ) 190	Postage	-(Ext/n Service) Fee	Handling Charge	Actual Value TRegistered	Insured Value	Due Sender If COD	ASR Fee	ASRD Fee	RD Fee	RR Fee	SC Fee	SCRD Fee	SH Fee
1. 7020 0640 0001 0261 7057	HUERTA YAJAIRA 4748 AVE 229 TULARE CA 93274													
2. 7020 0640 0001 0261 7064	190 HUERTA YAJAIRA 47721 THUNDERHILL ROAD SQUAW VALLEY CA 93675													
3. 7020 0640 0001 0261 7071	206 SANDOVAL GUDELIA G 1237 1/4 N FAIRFAX AVE WEST HOLLYWOOD CA 90046													
4. 7020 0640 000) 0261 70 <del>89</del>	206 SANDOVAL JUAN R 289 N L STREET DINUBA CA 93618	-												
5. 7020 0640 0001 0261 7095 5.	206 SANDOVAL JUAN R 1165 E MANNING REEDLEY CA 93654	- - - -				NICO	STER S	A FA	ESNO SNO	CA 9373				
7020 0640 0001	ALTA IRRICATION DISTRICT 289-WL STREET DINUBA CA 93618					15	268	2.2	1025					
8.		-						Jul	T					
Total Number of Pieces Listed by Sender 5 5 5					Information									

20

## **Party of Interest Notices** Skip Tracing for New Addresses to Mail Out

APN	ITEM NO Dat	e Mailed PINAME	PIADDRESS1	PIADDRESS2	PI CITY	PI STAT PI ZIP	GROUP	P/O ARTICLE NO.	P	ge # RECEIVED	RETURNED
360-180-30	206	2/25/2025 SANDOVAL GUDELIA G	1237 1/4 N FAIRFAX AVE		WEST HOLLYWO	DO CA	90046 SKIP TRACING	7020 0640 0001 0261	7071	392	x
360-180-30	206	2/25/2025 SANDOVAL JUAN R	289 N L STREET		DINUBA	CA	93618 SKIP TRACING	7020 0640 0001 0261	7088	392	
360-180-30	206	2/25/2025 SANDOVALJUAN R	1165 E MANNING		REEDLEY	CA	93654 SKIP TRACING	7020 0640 0001 0261	7095	392 X	

- Out of the 3 letters mailed from Skipped Tracing, 2 letters returned.
- Sandoval Juan R:
  - 289 N L Street Dinuba CA 93618
- Sandoval Gudelia G:
  - 1237 ¼ N Fairfax Ave West Hollywood CA 90046



## **Party of Interest Notices** Skip Tracing for New Addresses to Mail Out

AP	N IT	EM NO	Date M	ailed PINAME	PIADDRESS1	PIADDRESS2 PI CITY PI STAT PI ZIP GROUP P/O ARTICLE NO. Pa	e # RECEIVED	RETURNED
3	60-180-30	20	6	2/25/2025 SANDOVAL GUDELIA G	1237 1/4 N FAIRFAX AVE	WEST HOLLYWOO CA 90046 5KIP TRACING 7020 0640 0001 0261 7071	392	x
3	860-180-30	20	6	2/25/2025 SANDOVAL JUAN R	289 N L STREET	DINUBA CA 93618 SKIP TRACING 7020 0640 0001 0261 7088	392	
3	860-180-30	20	6	2/25/2025 SANDOVAL JUAN R	1165 E MANNING	REEDLEY CA 93654 SKIP TRACING 7020 0640 0001 0261 7095	392 X	

 From the 3 skipped trace letters sent 1 green card, signed by Edgar, and return to Fresno County Tax Collector office from the address 1165 E. Manning.

2. Article Number ( <i>Transfer from service label</i> )         2641         2795           7020         0640         0001         0261         7095	It Signature It Signature Restricted Delivery ified Mail® ect on Delivery ect on Delivery Restricted Delivery red Mail red Mail Restricted Delivery r \$500)	Priority Mail Expres      Registered Mail <sup>TM</sup> Registered Mail Res     Delivery      Return Receipt for     Merchandise      Signature Confirma     Restricted Delivery  comestic Return Rec

# **Satisfying Statutory Requirements**

#### Annual Tax Bills and Delinquent Notices

• Mailed each year to Assessee at the address shown on the tax roll, stating that there are delinquent taxes for the prior year

#### Notice of Power to Sell Tax Defaulted Property

• Recorded on July 15, 2024

Document Number 2024-0062291

#### Notices of Tax Sale

- Mailed to Parties of Interest on January 13, 2025
  - Under Revenue and Taxation Code sec. 3701, these notices must be sent "not less than 45 days nor more than 120 days before the proposed sale."
  - **Published in the Business Journal** on February 5, February 12, and February 19, 2025

#### Personal Contact Visit

• N/A – No valid homeowner's exemption and mailing address for last tax bill was not the same as the situs. The Subject Parcel is open land.

#### Tax Deed to Purchaser

• Recorded on April 29, 2025

# Four (4) Findings Necessary to Rescind the Sale

- 1. Property should not have been sold.
- 2. Property was not transferred or conveyed by the Purchaser to a "bona fide purchaser for value" since the deed to the Purchaser was recorded on April 29, 2025.
- 3. Property has not become subject to a "bona fide encumbrance for value" since the deed to the Purchaser as recorded on April 29, 2025.
- The Purchaser received notice of the hearing as required by Revenue and Taxation Code Section 3731, Subdivision (b)(2).

# Recommendation

Staff believes that the first finding that the property should not have been sold **cannot** be made

> Staff believes that the sale of the property **is** valid

> Staff's recommendation is to **not** rescind the sale