

**IN THE COMMON PLEAS COURT OF FRANKLIN COUNTY, OHIO
GENERAL DIVISION**

CRYSTAL D. HANZEL

c/o Kohl & Cook Law Firm, LLC
438 E. Wilson Bridge Road, Suite 200
Worthington, Ohio 43085,

Plaintiff,

v.

RICHARD D. JASINEK

6771 Brooklyn Heights Road
Westerville, Ohio 43081,

And

JPMORGAN CHASE BANK, N.A.

c/o CT Corporation System
4400 Easton Commons Way, Suite 125
Columbus, Ohio 43219

And

FRANKLIN COUNTY TREASURER

373 S. High Street, 17th floor
Columbus, Ohio 43215,

Defendants.

CASE NO.

JUDGE

PERM PARCEL NO.

010-298331-00

COMPLAINT FOR PARTITION OF REAL PROPERTY

The following allegations are based upon personal knowledge, the investigation of counsel, and information and belief. Plaintiff, through counsel, alleges as follows:

1. Plaintiff Crystal D. Hanzel ("Plaintiff") has been and is the owner as joint tenants with right of survivorship with Defendant Richard D. Jasinek ("Defendant Jasinek"), each with an undivided one-half interest of the real estate which is the subject of this action pursuant

to a General Warranty Deed (“Deed”), a copy of which is attached and incorporated as **Exhibit 1**.

2. The address of the property is 6771 Brooklyn Heights Road, Westerville, Ohio 43081 (the “Property”). The Property is described by the legal description on the face of the Deed.
3. The other Defendants in this lawsuit may have or may claim an interest in the Property. A preliminary judicial report regarding the potential interests of the other named Defendants is attached as **Exhibit 2**.
4. Plaintiff and Defendant Jasinek constitute all parties that have an ownership interest in, or a right to possession to, the Property, and there is a right to partition under R.C. 5307.01.
5. None of the interest in the Property came to such person by descent or devise upon the death of an inhabitant of Ohio.
6. Plaintiff and Defendant Jasinek cannot agree on an amicable sale of the Property.
7. The Property is a single-family residence and, therefore, partition by physical division is impractical.
8. Plaintiff seeks partition of the entire fee simple interest in the Property.
9. The prosecution of this action is for the common benefit of Plaintiff and Defendant Jasinek, and Plaintiff has incurred, and will continue to incur, attorney fees in the prosecution of this action.
10. Plaintiff is entitled to recover the attorney fees incurred, pursuant to R.C. 5307.25.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment against Defendants as follows:

- a. Require each Defendant to set forth their interest in the Property;

- b. Issue a writ of partition or order the Property sold, including pursuant to R.C. 5307.01, *et seq.*;
- c. Appoint one or more commissioners to make the partition or sell the Property, including pursuant to R.C. 5307.01, *et seq.*;
- d. Issue a determination of all parties' interest in the Property and order a division of the proceeds between the parties according to their respective rights;
- e. Grant Plaintiff costs and attorney fees, including pursuant to R.C. 5307.01, *et seq.*; AND
- f. Award all other relief the Court deems fair and equitable.

Dated: June 12, 2025.

Respectfully Submitted,

/s/ Matthew Lawson

Matthew Lawson (0102094)
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