

STATE OF VERMONT

SUPERIOR COURT
ADDISON UNIT

CIVIL DIVISION
DOCKET NO. 25-CV-04065

In re: Abandoned Mobile Home
of Eugene Raymond and Eugene Streeter
74 Hillside Drive, Starksboro

VERIFIED COMPLAINT

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

- 1. Addison County Community Trust, a Vermont non-profit corporation with a principal place of business in Addison County, Vermont, is the owner of the mobile home park located at 74 Hillside Drive, Starksboro, Vermont.
- 2. The names and last known addresses of the owners of the mobile home which is the subject of this action are believed to be:

Eugene Raymond
74 Hillside Drive
Starksboro, VT 05487

Eugene Streeter
NECC
1270 US Route 5 South
St. Johnsbury, VT 05819

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

Eugene Raymond
74 Hillside Drive
Starksboro, VT 05487

- 4. The mobile home is, on information and belief, a 1986 mobile Commodore mobile home, serial number CR11466A. There is no security deposit. See Exhibit 1, a true and correct copy of the Lease Agreement related to the subject mobile home; see Exhibit 2, an unrecorded mobile home bill of sale.
- 5. Plaintiff is aware of no creditors, holders of housing subsidy covenants, or others having a valid interest in the mobile home based on liens or notices of record in the Starksboro Land Records or the Office of the Secretary of State.
- 6. The facts supporting the claim that the mobile home has been abandoned are as follows:

A. Both Eugene Raymond and Eugene Streeter are believed to have passed away, according to obituaries of record. Eugene Raymond passed away on January 4, 2024, and Eugene Streeter passed away on June 8, 2025.

See obituaries, attached as Exhibit 3.

- 7. A disinterested party such as Thomas Hirchak Company, located at 1878 Cady Falls Road, Morrisville, VT 05661, is able to sell the mobile home at public auction.
- 8. The amount of rent due through the date of this action is \$10,715.20. Rent continues to accrue at the rate of \$405 per month. Unpaid property taxes currently total \$908.07. Plaintiff has also incurred (and will continue to incur) attorneys' fees and court costs, and will incur costs in connection with the sale of the mobile home.

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

Dated at Middlebury, Vermont this 18th day of September, 2025.
ADDISON COUNTY COMMUNITY TRUST
by DEPPMAN LAW PLC, its attorneys

By: /s/ Lesley B. Deppman
Lesley B. Deppman, Esq
56 Court Street
Middlebury, Vermont, 05753
Email: ldeppman@middlaw.com
Telephone: (802) 388-6337
Telefacsimile: (802) 382-8840

*FOR EXHIBITS 1, 2 AND 3, PLEASE CONTACT ATTORNEY LESLEY DEPPMAN AT ldeppman@middlaw.com.

VERIFICATION

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

Dated at Vergennes, Vermont, this 18th day of September, 2025.

/s/ Tori Marukelli
Tori Marukelli

STATE OF VERMONT
COUNTY OF ADDISON, SS.

Subscribed and sworn to before me this 18 day of Sept., 2025.

/s/ Sasha Bradford
Notary Public
My Commission Expires: 1/31/27
Commission No. 157.0015527
State of Vermont