

IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY, OHIO

Ann H. Womer Benjamin,
Superintendent, Ohio Department
of Insurance, in her capacity as
Rehabilitator of Builders & Contractors
Employee Benefit Association Trust,

Plaintiff,

Case No. 03 CVH09 10020

v.

JUDGE SCHNEIDER

A Day In the Country, et al.,

Defendants.

MOTION OF PLAINTIFF FOR DEFAULT JUDGMENT
AGAINST CERTAIN DEFENDANTS

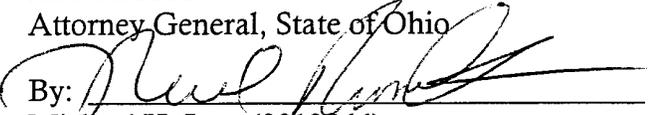
Pursuant to Rule 55 (A) and (C) of the Ohio Rules of Civil Procedure now comes Plaintiff Ann H. Womer Benjamin, Ohio Superintendent of Insurance in her capacity as Rehabilitator of Builders & Contractors Employee Benefit Association Trust and respectfully moves the Court to enter default judgments against certain Defendants, as said Defendants have failed to move or plead to the Amended Complaint as required by the Ohio Rules of Civil

FILED
CLERK OF COURT
FRANKLIN COUNTY, OHIO
OCT 14 2003 PM 4:31
COURT OF COURTS

Procedure. The basis for this motion is more fully set forth in the attached Memorandum in Support.

Respectfully submitted,

JIM PETRO
Attorney General, State of Ohio

By: 

Michael H. Igoe (0012866)

David M. Karr (0063613)

Necol Russell-Washington (0073367)

CARLILE PATCHEN & MURPHY LLP

366 East Broad Street

Columbus, Ohio 43215

Tele: (614) 228-6135

Fax: (614) 221-0216

Special Counsel for the Attorney General, State of Ohio, representing Ann H. Womer Benjamin, Superintendent of the Ohio Department of Insurance, in her capacity as Rehabilitator for Builders and Contractors Employee Benefit Association Trust

MEMORANDUM IN SUPPORT

On September 12, 2003, Plaintiff Ann H. Womer Benjamin, Ohio Superintendent of Insurance, brought this action in her capacity as Rehabilitator and on behalf of Builders & Contractors Employee Benefit Association Trust pursuant to R.C. §§ 1739.14 and 1739.15 against various defendants to recover assessments due under the terms of the Builders & Contractors Employee Benefit Association Trust. On April 5, 2004, Plaintiff filed her amended complaint to add additional parties and/or assert additional claims against Defendants named in the original action.

Service of Summons and a copy of the Amended Complaint were served on the following defendants by certified mail on the following dates.

Defendant	2000 Deficiency	2002 Deficiency	Total	Date Served
A. Sisser Jewelers, Inc.	\$1,011.36	\$-0-	\$1,011.36	4/09/04
A. D. Kasamias, M.D.	\$2,758.44	\$1,172.31	\$3,930.75	4/12/04
A/C Heating & Cooling, Inc.	\$-0-	\$506.90	\$506.90	4/09/04
Alliance Metals, Inc.	\$1,677.28	\$1,170.84	\$2,848.12	4/12/04
Amadco/Carroll Glass	\$703.42	\$-0-	\$703.42	4/09/04
American Whistle Corp.	\$687.12	\$978.41	\$1,665.53	4/09/04
B.R.'S Landscape Constr.	\$-0-	\$293.09	\$293.09	4/09/04
Backyard Putting Greens	\$364.12	\$256.04	\$620.16	4/09/04
Batteries Unlimited	\$565.15	\$1,553.11	\$2,118.26	4/08/04
Beaber Farms	\$-0-	\$901.19	\$901.19	4/09/04
Berger Peat Moss	\$-0-	\$355.52	\$355.52	4/23/04
Bestway Bath Systems, Inc.*	\$-0-	\$739.93	\$739.93	4/05/04
Bob Miller Landscaping	\$199.08	\$469.70	\$668.78	4/14/04
Bordonaro Landscaping	\$350.56	\$172.41	\$522.97	4/12/04
Botson's Cycle & Acces.	\$258.84	\$69.60	\$328.44	4/12/04
Braden Medical Services	\$-0-	\$6,100.48	\$6,100.48	4/08/04
Briar Hill Landscaping	\$549.48	\$367.97	\$917.45	4/12/04
Brooker's Pit Stop, Inc.	\$-0-	\$1,350.85	\$1,350.85	4/08/04
Bruderly Excavating Co.*	\$-0-	\$752.92	\$752.92	4/05/04
Bryant's Forever Green	\$-0-	\$588.79	\$588.79	4/12/04
Callos Prof. Employment	\$48,319.09	\$27,047.84	\$75,366.93	4/12/04
Canfield Dairy Queen	\$811.85	\$320.49	\$1,132.34	4/12/04
Cantrell Construction Co.	\$-0-	\$177.36	\$177.36	6/01/04
Cardinal Restaurants, Inc.	\$6,690.82	\$-0-	\$6,690.82	4/09/04
Carroll Glass & Maint., Inc.	\$11,408.87	\$9,098.88	\$20,507.75	4/09/04
Center Township/Noble County	\$-0-	\$776.20	\$776.20	4/08/04
Century 21 (RHA Group)	\$244.89	\$695.49	\$940.38	4/08/04
Champion Creek Landscape	\$-0-	\$91.66	\$91.66	4/13/04
Champion Transport	\$1,542.88	\$3,615.75	\$5,158.63	4/09/04
Chesterland Nurseries	\$37.24	\$147.71	\$184.95	4/09/04
Colonial Auto Sales & Serv.	\$-0-	\$1,005.62	\$1,005.62	4/09/04
Corsi Landscaping	\$-0-	\$185.15	\$185.15	6/01/04
Country Side Landscaping	\$1,113.14	\$870.19	\$1,983.33	4/10/04
Crane Services, Inc.	\$902.94	\$663.51	\$1,566.45	4/13/04
D. J. Group, Inc.	\$1,777.72	\$994.98	\$2,772.70	4/10/04
DLM Properties	\$87.86	\$-0-	\$87.86	4/13/04
Dan's Landscaping	\$182.06	\$239.23	\$421.29	4/09/04
David C. Zangmeister, MD	\$788.95	\$936.81	\$1,725.76	4/08/04
Drs. Davenport and Rohrabough	\$1,277.05	\$1,823.10	\$3,100.15	4/09/04
Dealers Supply Co.	\$10,181.72	\$1,722.09	\$11,903.81	4/16/04
Deluxe Motel, Inc.	\$740.23	\$-0-	\$740.23	4/09/04
Demyan's Service Center	\$-0-	\$495.22	\$495.22	4/09/04
Designing with Nature	\$733.37	\$180.47	\$913.84	4/10/04
DeWeese Landscaping	\$732.59	\$748.94	\$1,481.53	4/09/04
Digital Color Imaging	\$-0-	\$7,869.37	\$7,869.37	4/09/04
Dilco Industries, Inc.	\$-0-	\$666.81	\$666.81	4/13/04
Donald Bunner	\$176.16	\$-0-	\$176.16	6/01/04
Duncan Plumbing	\$3,798.95	\$2,088.46	\$5,887.41	4/09/04
Eddie Turk	\$-0-	\$338.23	\$338.23	4/09/04
Electric Motor Repair	\$4,922.19	\$2,474.08	\$7,396.27	4/12/04
Ellet Manor	\$-0-	\$599.51	\$599.51	6/01/04
Ermco, Inc.	\$9,550.57	\$-0-	\$9,550.57	4/19/04
Fair Sales Consultants	\$341.50	\$-0-	\$341.50	4/12/04

Defendant	2000 Deficiency	2002 Deficiency	Total	Date Served
Falls Landscape	\$751.68	\$678.71	\$1,430.39	4/09/04
Fireland's Lawn	\$968.61	\$325.84	\$1,294.45	4/08/04
First Quality Collision	\$1,553.50	\$3,165.34	\$4,718.84	4/08/04
Florafinos Greenhouse	\$386.96	\$372.10	\$759.06	4/08/04
Fostoria Grain Inspection	\$2,815.05	\$497.09	\$3,312.14	4/12/04
Fred J. Robinson & Assoc.	\$-0-	\$162.86	\$162.86	4/12/04
Gattuso's Music Center	1,100.41	\$1,167.29	\$2,267.70	4/09/04
Gary's Wholesale, Inc.	\$259.01	\$446.69	\$705.70	4/09/04
Gill's Quality Meat Market	\$-0-	\$143.98	\$143.98	4/10/04
Global Organic Alliance	\$364.87	\$214.58	\$579.45	4/13/04
Godard Leasing & Sales	\$2,300.53	\$-0-	\$2,300.53	4/12/04
Goodby Charlie	\$129.87	\$-0-	\$129.87	6/01/04
Greenleaf Landscapes, Inc.	\$-0-	\$5,037.34	\$5,037.34	4/12/04
Harmony Landscaping	\$119.03	\$335.02	\$454.05	6/01/04
Hartman Drywall	\$501.34	\$362.98	\$864.32	4/10/04
Hay's Enterprises	\$-0-	\$3,148.64	\$3,148.64	4/12/04
Heavener Enterprise	\$-0-	\$248.03	\$248.03	4/09/04
Hoehnen Landscape	\$633.58	\$583.64	\$1,217.22	4/12/04
Holiday Bar, Inc.	\$745.27	\$557.31	\$1,302.58	4/12/04
Home & Kitchen Supply Co.	\$-0-	\$3,341.28	\$3,341.28	4/09/04
Honey Creek Contracting	\$5,633.00	\$2,837.74	\$8,470.74	4/16/04
Karol Klusty	\$730.32	\$195.00	\$925.32	4/09/04
J & D Painting	\$-0-	\$959.66	\$959.66	6/01/04
Joanne A. Dockery	\$562.01	\$-0-	\$562.01	4/10/04
KMA & Associates*	\$326.38	\$117.79	\$444.17	4/05/04
Kellers Fine Line Welding	\$755.64	\$414.45	\$1,170.09	4/15/04
Kenneth Cowens MD Inc.*	\$-0-	\$122.30	\$122.30	4/05/04
Kilar Mfg., Inc.	\$11,234.91	\$1,467.50	\$12,702.41	4/12/04
King Expediting*	\$662.05	\$514.23	\$1,176.28	4/05/04
King Limestone, Inc.	\$-0-	\$7,049.08	\$7,049.08	4/09/04
Landscape Creations	\$43.84	\$381.45	\$425.29	4/22/04
Larry's Pet Grooming	\$170.82	\$-0-	\$170.82	4/12/04
Lashley Tractor Sales Inc.*	\$3,110.89	\$2,956.41	\$6,067.30	4/05/04
Lenore D. Byers	\$253.37	\$-0-	\$253.37	4/13/04
Leslie Scott Landscape	\$-0-	\$255.40	\$255.40	4/12/04
Linn Engineering, Inc.	\$-0-	\$2,306.69	\$2,306.69	4/09/04
Lucile Binion	\$535.16	\$-0-	\$535.16	6/01/04
Luscher Construction	\$367.34	\$-0-	\$367.34	6/01/04
McCallister Landscaping	\$452.31	\$374.12	\$826.43	6/01/04
Machine Dynamics	\$2,770.12	\$84.84	\$2,854.96	4/10/04
Madhu Asset Management	\$181.81	\$-0-	\$181.81	4/12/04
Mahoning Womens Center	\$839.97	\$598.12	\$1,438.09	4/12/04
Marietta Urology, Inc.	\$-0-	\$1,839.07	\$1,839.07	4/14/04
Marilyn Bell	\$158.97	\$240.55	\$399.52	4/10/04
Mason Color Works, Inc.	\$10,855.48	\$4,097.47	\$14,952.95	4/12/04
Master Auto Body	\$400.80	\$446.67	\$847.49	4/14/04
Muffler House of Cambridge	\$-0-	\$797.34	\$797.34	4/09/04
Myers & Sons, Inc.	\$1,847.48	\$1,381.04	\$3,228.52	4/09/04
National Manufacturing	\$4,384.23	\$1,971.47	\$6,355.70	4/12/04
Nature's Way Landscaping	\$951.20	\$684.31	\$1,635.51	4/12/04
Northeast Tire Mold, Inc.*	\$11,814.24	\$-0-	\$11,814.24	4/05/04
NM of El Paso	\$2,388.59	\$-0-	\$2,388.59	4/12/04
Perfect Cut-Off, Inc.	\$24,623.73	\$-0-	\$24,623.73	4/12/04
Perin Basil	\$32.61	\$-0-	\$32.61	4/19/04
Pipes By Pappy's	\$1,151.26	\$-0-	\$1,151.26	4/10/04
Pro Touch Lawn Care	\$445.26	\$285.71	\$730.97	4/12/04
Ridgely Home Modernizing	\$-0-	\$491.62	\$491.62	4/12/04
Ridgewood Landscaping	\$158.51	\$111.97	\$270.48	4/12/04

Defendant	2000 Deficiency	2002 Deficiency	Total	Date Served
Robert W. Egolf Construction*	\$1,016.63	\$-0-	\$1,061.63	4/05/04
Russell Automotive Center*	\$968.56	\$503.05	\$1,471.61	4/05/04
Ryan Carpet Service	\$-0-	\$624.85	\$624.85	4/12/04
S & D Application, Inc.	\$2,515.67	\$2,352.46	\$4,868.13	4/12/04
S.G. Miller Plumbing	\$-0-	\$475.31	\$475.31	6/01/04
Scenic-FX Inc.	\$182.06	\$326.39	\$508.45	4/13/04
Shanta Raghavan	\$971.59	\$423.06	\$1,394.65	4/12/04
Sidoti	\$847.15	\$1,154.23	\$2,001.38	4/12/04
Sigler Trucking	\$846.58	\$681.43	\$1,528.01	4/12/04
Skyway Park, Inc.	\$-0-	\$6,189.25	\$6,189.25	4/12/04
Steven Downer, DPM*	\$108.38	\$-0-	\$108.38	4/05/04
Sourlis Rentals, Inc.	\$-0-	\$241.04	\$241.04	4/13/04
Southwest Tire Molds, Inc.	\$2,718.70	\$-0-	\$2,718.70	4/13/04
Special Scapes	\$-0-	\$61.30	\$61.30	4/22/04
Super Tire	\$1,484.71	\$-0-	\$1,484.71	4/12/04
Supers Landscape, Inc.	\$-0-	\$1,679.30	\$1,679.30	4/12/04
T & C Landscaping	\$203.63	\$219.28	\$422.91	4/14/04
T. C. Moore & Assoc., Inc.	\$1,793.18	\$1,509.89	\$3,303.07	4/10/04
Terrascape Outdoors	\$-0-	\$509.08	\$509.08	4/12/04
The Grand Rock Co., Inc.	\$8,204.96	\$5,997.03	\$14,201.99	4/13/04
The Murray Company	\$-0-	\$257.09	\$257.09	6/01/04
Theodore Treece	\$-0-	\$109.17	\$109.17	4/12/04
Thomas Bacha	\$34.45	\$-0-	\$34.45	4/12/04
Timberlanes, Inc.	\$-0-	\$1,805.93	\$1,805.93	4/12/04
Tony's Lawn Care*	\$51.65	\$-0-	\$51.65	4/05/04
Tony Trollos's T-Shirts	\$87.96	\$302.43	\$390.39	4/12/04
Top Line Transportation	\$3,746.91	\$2,280.39	\$6,027.30	4/12/04
Tri-K Enterprises, Inc.	\$2,847.14	\$1,792.78	\$4,639.92	4/12/04
Trimble's Rural Remnants	\$-0-	\$306.79	\$306.79	4/12/04
Triple S. Machine, Inc.	\$6,937.26	\$1,028.28	\$7,965.54	4/12/04
Tri-State Mobility Equip.	\$11,123.00	\$8,598.83	\$19,721.83	4/14/04
Vizmeg & Sons	\$121.37	\$-0-	\$121.37	4/12/04
Wallace Poured Walls, Inc.	\$983.30	\$2,615.77	\$3,599.07	4/10/04
Warren Trumble Urban	\$3,824.50	\$2,430.86	\$6,255.36	4/12/04
Weber Construction	\$1,045.99	\$576.06	\$1,622.05	4/10/04
Wellman Seeds, Inc.	\$-0-	\$1,680.89	\$1,680.89	4/12/04
William R. Dorsey D.O., Inc.*	\$-0-	\$1,470.38	\$1,470.38	4/05/04
Wilson & Sons Landscaping	\$146.77	\$-0-	\$146.77	4/20/04
Working with Nature	\$802.81	\$513.89	\$1,316.70	4/12/04
Youngstown Spec. Metals	\$-0-	\$512.42	\$512.42	4/15/04
Zeris Interactive	\$2,122.21	\$2,278.11	\$4400.32	4/12/04
Zimmerman Realty Ltd.	\$-0-	\$278.00	\$278.00	4/10/04

* These defendants were served by ordinary mail.

The original twenty-eight day time frame for filing a response set forth in Civ.R. 12(A)(1) has since passed and, to date, the foregoing defendants have failed to file any response, or otherwise make an appearance in this matter. Likewise, there has been no stipulation as to an extension of time entered on the Court's docket.

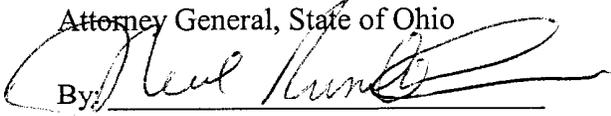
Ohio Civil Rule 55 states, in pertinent part:

(A) When a party against whom judgment for affirmative relief is sought has failed to plead or otherwise defend as provided by these rules, the party entitled to a judgment for relief shall apply in writing or orally to the court therefor; * * * *

Pursuant to Ohio Civ.R. 55, the foregoing defendants are in default by failing to plead or otherwise defend. In particular, the defendants have failed to file an answer with this Court as required by Civ.R. 5(D), 5(E), 7(A) and 12(A).

For the foregoing reasons, pursuant to Civ.R. (12)(A)(1) and 55(A), Plaintiff is entitled to default judgment, and respectfully requests that the Court grant such, against the foregoing defendants, in the foregoing amounts, plus statutory interest at 10% per annum from December 17, 2003 through June 1, 2004, at 4% per annum from June 2, 2004 through July 30, 2004, and additional interest at the rate as allowed by law thereafter, plus costs associated with pursuing this action. For the convenience of the Court, a proposed Entry has been submitted herewith.

JIM PETRO
Attorney General, State of Ohio

By: 

Michael H. Igoe (0012866)
David M. Karr (0063613)
Necol Russell-Washington (0073367)
CARLILE PATCHEN & MURPHY LLP

366 East Broad Street
Columbus, Ohio 43215

Tele: (614) 228-6135

Fax: (614) 221-0216

*Special Counsel for the Attorney General,
State of Ohio, representing Ann H. Womer
Benjamin, Superintendent of the Ohio
Department of Insurance, in her capacity as
Rehabilitator for Builders and Contractors
Employee Benefit Association Trust*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing Motion for Default Judgment was served upon the following, by regular U. S. Mail, postage prepaid, this 30th of July, 2004:

A Sisser Jewelers, Inc.
2044 East Fourth Street
Cleveland, OH 44115

Beaber Farms
2892 Beechwood Avenue
Paris, OH 44669

A.D. Kasamias, M.D.
Post Office Box 1874
Youngstown, OH 44501-1874

Berger Peat Moss
2310 Ragan Woods
Toledo, OH 43614

A/C Heating & Cooling, Inc.
c/o Helen K. Large, Statutory Agent
1447 Normandy Circle
Barberton, OH 44203

Bestway Bath Systems, Inc.
6543 Harrison Avenue
Cincinnati, OH 45247

Airfasco Industries, Inc.
207 Schneider Street NE
N. Canton, OH 44720

Bob Miller Landscaping
c/o Robert M. Miller, Statutory Agent
7844 West Law Road
Valley City, OH 44280

Amadco/Carroll Glass
26985 Lakeland Boulevard
Euclid, OH 44132-2656

Bordonaro Landscaping
7282 Thornapple Drive
Solon, OH 44139

American Whistle Corp.
c/o Ray Giesse, Statutory Agent
6540 Huntley Road
Columbus, OH 43229

Botsons' Cycle & Accessories
61992 Westland Street
Cambridge, OH 43725-9115

B.R.'s Landscape Constr.
511 North River Road
Munroe Falls, OH 44262

Braden Med Services
44510 State Route 821
Caldwell, OH 43724

Backyard Putting Greens
c/o Thomas G. Herrick, Sr., Statutory Agent
9578 Mulberry Road
Chesterland, OH 44026-1642

Briar Hill Landscaping
17498 Merry Oaks Trail
Chagrin Falls, OH 44023

Brooker's Pit Stop
Route 3
Marietta, OH 45750

Batteries Unlimited
2350 Adamsville Road
Zanesville, OH 43701

Bruderly Excavating Co.
17380 Middletown Road
North Benton, OH 44449

Bryant's Forever Green
10514 Old State Road
Chardon, OH 44024

Callos Prof. Employment
Summit Park Square, Suite 101
3340 West Market Street
Fairlawn, OH 44333

Canfield Dairy Queen
101 South Broad Street
Canfield, OH 44406

Cantrell Construction Co.
501 Manhattan Parkway
Painesville Township, OH 44077

Cardinal Restaurants, Inc.
243 North Broadway
Medina, OH 44256

Carroll Glass & Maint. Inc.
26985 Lakeland Boulevard
Euclid, OH 44132

Center Twp./Noble County
49223 State Route 147
Sarahsville, OH 43779

Century 21 (RHA Group)
103 North Main Street
Bellefontaine, OH 43311

Champion Creek Landscape
Post Office Box 2577
Stowe, OH 44224

Champion Transport
4 Water Street
Niles, OH 44446

Chesterland Nurseries
Post Office Box 805
Chesterland, OH 44026

Colonial Auto Sales & Service
8228 East Washington Street
Chagrin Falls, OH 44023

Corsi Landscaping
7704 Brookside Road
Independence, OH 44131

Country Side Landscaping
Post Office Box 360035
Cleveland, OH 44136

Crane Services, Inc.
c/o Joseph V. Cadile, Statutory Agent
13635 Main Street
Beloit, OH 44609

D. J. Group
6th & Center Street
Post Office Box 337
Beverly, OH 45715

Dan's Landscaping
272 East 238th Street
Euclid, OH 44123-1527

David C. Zangmeister, M.D.
304 Chestnut Street
Dresden, OH 43821

Dealers Supply Co.
112 South Duke Street
Post Office Box 2628
Durham, NC 27715

Deluxe Motel, Inc.
9236 Mentor Avenue
Mentor, OH 44060

Demyan's Service Center
115 Poland Avenue
Struthers, OH 44471

Designing With Nature
772 Franklin Boulevard
Highland Heights, OH 44143

DeWeese Landscaping
c/o Stan DeWeese, Statutory Agent
11698 Auburn Road
Chardon, OH 44024-9439

Digital Color Imaging
388 South Main Street, Suite 401
Akron, OH 44311

Dilco Industries, Inc.
1801 New Garden Road
Post Office Box 859
Salem, OH 44460

DLM Properties
931 Gomer Avenue
Cambridge, OH 43725-1821

Dodson Furniture Inc.
5480 Youngstown Warren Road
Niles, OH 44446

Donald Bunner
719 Newberry Street
Cuyahoga Falls, OH 44221

Drs. Davenport/Rohrbaugh
277 South High Street
Cortland, OH 44410

Duncan Plumbing
108 South Main Street
Poland, OH 44514

Eddie Turk
6101 St. Clair
Cleveland, OH 44130

Electric Motor Company
16308 Claire Avenue
Cleveland, OH 44111-2900

Ellet Manor
2755 Ellet Avenue
Akron, OH 44312

Ermco, Inc.
Post Office Box 347
Willoughby Hills, OH 44096

Fair Sales Consultants
47829 Tomahaw Drive
Negley, OH 44441

Falls Landscape
c/o U-B Corporation, Statutory Agent
1300 East Ninth Street #900
Cleveland, OH 44114-1583

Fireland's Lawn
248 Cleveland Road
Norwalk, OH 44857

First Quality Collision
c/o Jeffrey L. Roberts, Statutory Agent
121 South Fourth Street
Marietta, OH 45750

Florafinos Greenhouses
1343 Ohio Street
Zanesville, OH 43701

Fostoria Grain Inspection
626 West Fourth Street
Fostoria, OH 44830

Fred J. Robinson & Assoc.
7680 Ellie Place
Mentor, OH 44060

Gary's Wholesale, Inc.
30 West Main Street
Ashland, OH 44805

Gattuso's Music Center
3029 Whipple Avenue N.W.
Canton, OH 44718

Gill's Quality Meat Market
1522 Selma Road
Springfield, OH 45505

Global Organic Alliance
3185 Township Road 179
Post Office 530
Bellefontaine, OH 43311

Godard Leasing & Sales
Post Office Box 249
Sharon Center, OH 44274

Goodbye Charlie
13720 Shaker Boulevard, Suite 701
Cleveland, OH 44120

Greenleaf Landscapes, Inc.
c/o Robert Ellis, Statutory Agent
286 Front Street
Marietta, OH 45750

Harmony Landscaping
3483 East 52nd Street
Cleveland, OH 44127

Hartman Drywall
1497 Eastern Road
Rittman, OH 44270

Hay's Enterprises
1901 Bailey Road
Warren, OH 44481

Health Management Group
c/o Thomas R. Brule, Statutory Agent
395 Springside Drive
Akron, OH 44333

Hearn Paper Company
556 North Meridian Road
Youngstown, OH 44509

Heavener Enterprise
606 Mill Street
New Lexington, OH 43764

Hoehnen Landscape
17159 North Brook Trail
Chagrin Falls, OH 44023

Holiday Bar, Inc.
c/o Don P. Stark, Sr., Statutory Agent
2124 Elm Road NE
Warren, OH 44483

Home & Kitchen Supply Co.
163 North Diamond Street
Mansfield, OH 44902

Homes for Kids of Ohio
31 North Main Street
Niles, OH 44446

Honey Creek Contracting
11640 South Stateline Road
Post Office Box 276
Petersburg, OH 44454

J & D Painting
Post Office Box 241010
Mayfield Heights, OH 44124

Joanne A. Dockery
452 Rosewae
Cortland, OH 44410

K.M.A. and Associates, Inc.
820 West Superior
Cleveland, OH 44113

Karol Klusty
1951 Fulton Drive
Coshocton, OH 43812

Kellers Fine Line Welding
1049 Shadowlawn Drive
Ravenna, OH 44266

Kenneth Cowens M.D. Inc.
333 Park Avenue
Youngstown, OH 44504

Kilar Mfg., Inc.
2616 North Main Street
Hubbard, OH 44425

King Expediting
3777 Catalina Drive #A
Dayton, OH 45431-1759

King Limestone
c/o Duane King, Statutory Agent
53681 Spender Road
Cumberland, OH 43732

Landscape Creations
Post Office Box 296
Chesterland, OH 44026

Larry's Pet Grooming
976 McIntire Avenue
Zanesville, OH 43701

Lashley Tractor Sales, Inc.
24821 State Route 313
Quaker City, OH 43773

Lenore D. Byers
2861 Loreta Drive
Willoughby Hills, OH 44094

Leslie Scott Landscape
1506 Maple Road
Cleveland Heights, OH 44121

Linn Engineering
c/o Timothy H. Linn, Statutory Agent
534 Market Street
Zanesville, OH 43701

Lucile Binion
3287 East 103 Road
Cleveland, OH 44104

Luscher Construction
2342 McCleary Jacoby
Cortland, OH 44410

Machine Dynamics
c/o Kenneth C. Barkan, Statutory Agent
3105 Avalon Road
Carrollton, OH 44615

Madhu Asset Management
4010 Boardman Canfield Road, Suite 1
Canfield, OH 44406

Mahoning Womens Center
4025 Market Street
Youngstown, OH 44512

Marietta Urology, Inc.
c/o B. Douglas Harris, Statutory Agent
Route 2, Box 107
Belpre, OH 45714

Marilyn Bell
1576 Wilsonway Drive
Barberton, OH 44203

Mason Color Works, Inc.
c/o Jackman S. Vodrey, Statutory Agent
517 Broadway, 3rd Floor
East Liverpool, OH 43920

Master Auto Body
1090 East 305th Street
Willowick, OH 44092

McCallister Landscaping
6011 Collins Road
Mentor, OH 44060

Muffler House of Cambridge
1426 Campbell Avenue
Cambridge, OH 43725

Myers & Sons, Inc.
502 Summer Street
Post Office Box 167
Fostoria, OH 44830

National Manufacturing
49 West Federal Street
Niles, OH 44446

Nature's Way Landscaping
Post Office Box 36
Chesterland, OH 44026

NM of El Paso
49 West Federal Street
Niles, OH 44446

Northeast Tire Mold, Inc.
156 Opportunity Parkway
Akron, OH 44307

Perfect Cut-Off, Inc.
29201 Anderson Road
Wickliffe, OH 44092

Perin Basil
12060 Parker Drive
Chesterland, OH 44026

Pipes By Pappy's
4469 Funk Road
Post Office Box 314
Shelby, OH 44875

Pro Touch Lawn Care
5591 Eastlake Road
Medina, OH 44256

Quality Builders
60456 Patch Road
New Concord, OH 43762

Ridgely Home Modernizing
1551 East Main Street
Springfield, OH 45503

Ridgewood Landscaping
8700 Lost Trail Avenue NE
North Canton, OH 44721

Robert W. Egolf Construction
4479 Clearview Drive
Canfield, OH 44406

Russell Automotive Center
15565 Chillicothe Road
Chagrin Falls, OH 44022

Ryan Carpet Service
70 Victoria Road
Austintown, OH 44515

S & D Application, Inc.
c/o Douglas Miller, Statutory Agent
158 North Church Street
Wayne, OH 43466

S. G. Miller Plumbing
1313 Gordon Landis Road
Arcanum, OH 45304

Scenic-FX Inc.
2684 Antiock Road
North Perry, OH 44081

Shanta Raghavan
2100 Fay Drive
Parma, OH 44134

Sidoti
98 First Avenue
Bedford, OH 44146

Sigler Trucking
1831 Foraker
Findlay, OH 45840

Skyway Park, Inc.
2879 Maysville Pike
Zanesville, OH 43701

Sourlis Rentals, Inc.
3351 Little York Road
Dayton, OH 45414

Southwest Tire Molds, Inc.
159 Opportunity Parkway
Akron, OH 44307

Special Scapes
34088 Center Ridge Road
N. Ridgeville, OH 44039

Steven Downer, DPM
409 Second Street
Marietta, OH 45750

Super Tire
3485 State Route 5
Cortland, OH 44410

Supers Landscape, Inc.
c/o Gregory Supers, Statutory Agent
48211 Route 511 West
Oberlin, OH 44074

T & C Landscaping
Post Office Box 64
East Claridon, OH 44033

T.C. Moore & Assoc., Inc.
128 East North Broadway
Columbus, OH 43214

Terrascape Outdoors
14369 Aquilla Road
Burton, OH 44021

The Murray Company
1298 Winston Road
South Euclid, OH 44121

Theodore Treece
23822 Buck Road
Alliance, OH 44601

Thomas Bacha
5028 Friendship Avenue
Boardman, OH 44512

Timberlanes, Inc.
544 East Pershing Avenue
Salem, OH 44460

Tony Trolio's T-Shirts
35 West McKinley Way
Poland, OH 44514

Tony's Lawn Care
7910 Stacy Road
Sandusky, OH 44870

Top Line Transportation
6385 State Route 18
Republic, OH 44867

Tri-K Enterprises, Inc.
935 McKinley SW
Canton, OH 44707

Trimble's Rural Remnants
2590 North Ridge Road
Elyria, OH 44035

Triple S. Machine, Inc.
4920 Fireside Drive
Akron, OH 44319

Tri-State Mobility Equip.
940 Cleveland Avenue SW
Canton, OH 44707-4015

Vizmeg & Sons
5335 Sullivan Road
Hudson, OH 44236

Wallace Poured Walls, Inc.
c/o Steven Vaughn Wallace, Statutory
Agent
Route 3, Box 31
Stockport, OH 43787

Warren Trumbell Urban
290 West Market Street
Warren, OH 44481-1072

Weber Construction
927 North Main Street
Fostoria, OH 44830-2013

Wellman Seeds, Inc.
c/o James A. Wellman, Statutory Agent
Route 1, Box 4
Delphos, OH 45833

William R. Dorsey, D.O., Inc.
c/o Charles W. Slicer, Jr., Statutory Agent
318 West Fourth Street
Dayton, OH 45402

Wilson & Sons Landscaping
36190 Detroit
Avon, OH 44011

Working With Nature
c/o Gary Solomon, Statutory Agent
9984 Mayfield Road
Chesterland, OH 44026

Youngstown Spec. Metals
Post Office Box 1772
Youngstown, OH 44501-1772

Zeris Interactive
388 South Main Street, Suite 409
Akron, OH 44311

Zimmerman Realty, Ltd.
143 Chillicothe Avenue West
Bellefontaine, OH 43311

JIM PETRO
Attorney General, State of Ohio

By: 

Michael H. Igoe (0012866)
David M. Karr (0063613)
Necol Russell-Washington (0073367)
CARLILE PATCHEN & MURPHY LLP
366 East Broad Street
Columbus, Ohio 43215
Tele: (614) 228-6135
Fax: (614) 221-0216
*Special Counsel for the Attorney General, State
of Ohio, representing Ann H. Womer
Benjamin, Superintendent of the Ohio
Department of Insurance, in her capacity as
Rehabilitator for Builders and Contractors
Employee Benefit Association Trust*