

D-1-GN-24-002539

CAUSE NO. \_\_\_\_\_

M.K.,	§	IN THE DISTRICT COURT OF
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	
	§	TRAVIS COUNTY, TEXAS
	§	
CLEAR PROPERTY MANAGEMENT, LLC, and AVELA REAL ESTATE PARTNERS, INC.,	§	250TH, DISTRICT COURT
	§	
<i>Defendants.</i>	§	_____ JUDICIAL DISTRICT
	§	

**PLAINTIFF’S ORIGINAL PETITION**

Plaintiff, M.K. (“Plaintiff”), files this Original Petition, complaining of Defendants, Clear Property Management, LLC and Avela Real Estate Partners, Inc. (collectively “Defendants”), and alleges as follows:

**I. DISCOVERY CONTROL PLAN**

1. Plaintiff intends to conduct discovery under Level 3 of Texas Rule of Civil Procedure 190.4 and requests this Court enter an appropriate Scheduling Order so that discovery may be conducted under Level 3.

2. Plaintiff affirmatively pleads that this suit is not governed by the expedited-actions process in Texas Rule of Civil Procedure 169 because Plaintiff seeks monetary relief over \$250,000.

**II. CLAIM FOR RELIEF**

3. Pursuant to Tex. R. Civ. P. 47(c)(5), Plaintiff seeks monetary relief over \$1,000,000.

### III. PARTIES

4. Plaintiff, M.K. (“Plaintiff”), is an individual residing in Travis County, Texas. The last three digits of Plaintiff’s driver’s license are 716; the last three digits of her Social Security number are 507. Due to the inherently intimate and sensitive nature of the claims in this lawsuit, this petition and all subsequent pleadings will identify Plaintiff by her initials only. Plaintiff’s identity will be timely disclosed to Defendants in accordance with the Texas Rules of Civil Procedure.

5. Defendant Clear Property Management, LLC (“CPM”), a Texas limited-liability company whose registered office is located in Travis County, Texas at 9050 N. Capital of Texas Hwy., Ste. 3-320, Austin, Texas 78759, may be served with process by serving its registered agent for service of process, the PPA Group, LLC, 11149 Research Blvd., Ste. 375, Austin, Texas 78759. At all relevant times, CPM managed the Menlo at Mueller Apartments located at 6855 E Hwy 290, Austin, Texas 78723 (“the apartments in question”).

6. Defendant Avela Real Estate Partners, Inc. (“Avela”), a Texas corporation whose registered office is located in Travis County, Texas at 500 W. 2<sup>nd</sup> St., Ste. 1900, Austin, Texas 78701-4687, may be served with process by serving its registered agent for service of process, Registered Agent Solutions, Inc., Corporate Center One, 5301 Southwest Parkway, Suite 400, Austin, Texas 78735. At all relevant times, Avela owned the apartments in question.

7. Plaintiff expressly invokes her right under Rule 28 of the Texas Rules of Civil Procedure to have the true name of any of the above Defendants substituted later upon the motion of any party or of the Court.

#### **IV. JURISDICTION AND VENUE**

8. The Court has subject-matter jurisdiction over the lawsuit because the amount in controversy exceeds this Court's minimum jurisdictional requirements.

9. Venue is proper in Travis County, Texas pursuant to Tex. Civ. Prac. & Rem. Code § 15.002(a)(1), as all or a substantial part of the events or omissions giving rise to the claim occurred in Travis County, Texas.

#### **V. FACTS**

10. On December 6, 2022, at approximately 2:45 a.m., Plaintiff was asleep in her bed at the apartments in question when she suddenly awoke to a strange man ("the intruder") in bed with her rubbing her vaginal area.

11. Terrified, Plaintiff immediately rolled over and kicked the intruder in the chest to push him off her. The intruder then lunged at her as she tried to throw her blanket at him. The two of them engaged in a brief struggle as Plaintiff repeatedly screamed, "WHO THE F\*\*\*\* ARE YOU?"

12. After fighting him off, Plaintiff saw the intruder run out of her room, down the stairs, and out of the back sliding glass door—which he left ajar. Plaintiff's roommate, having heard the screams, was already on the phone with 911 when she came downstairs to find out what happened. Plaintiff, who was hysterical, told her that there was a strange man in their apartment who had assaulted her. The two young women closed the back sliding glass door and waited together until police arrived a few minutes later.

13. When the police arrived, Plaintiff reported what happened. With no signs of forced entry, the police asked Plaintiff and her roommate how the intruder got inside their apartment. The

young women explained that the lock on the back sliding glass door was broken, despite their repeated requests for management to repair it.



*Back Sliding Glass Door*

14. In fact, Plaintiff and her roommate had been repeatedly complaining to CPM, the management company for the apartments in question, about this door for over a year. The complaints were submitted both orally and in writing through CPM’s online Maintenance Request Portal. Although CPM would sometimes send a repairman out to work on the door, the lock was never fixed.

15. At one point, the women specifically requested a sliding door security bar (“security bar”), which is an additional lock that secures a sliding glass door. However, CPM management told the women that they would have to purchase and install the security bar themselves, in

violation of Tex. Prop. Code § 92.153(a)(4) (“[W]ithout the necessity of request by the tenant, a dwelling must be equipped with ... a sliding door handle latch or a sliding door security bar on each exterior sliding glass door of the dwelling).

16. After police interviewed the women, photographed the apartment, and collected DNA swabs from Plaintiff, the officers used a spare table to block the back sliding glass door so that the intruder could not reenter their apartment that night.

17. The next morning, Plaintiff’s roommate confronted CPM management about what happened. Plaintiff’s roommate told the female manager that they had been asking for the back door to be fixed for months now, and it wasn’t fixed. The manager agreed. Plaintiff’s roommate went on to say that had the back door been fixed, the assault never would have happened because the intruder got in and out through the back door. Seemingly stunned, the manager simply replied, “Wow.”

18. When the manager called in her supervisor, Greg, he stated that when he and the CPM repairman went to inspect the door, they did not see any issues with it. Plaintiff’s roommate corrected him:

It doesn’t lock. It does not catch when you try to lock it ... That’s what we were talking about when we were in your office, saying about the back door; and I think you told us to order the little bar thing off Amazon because the previous door that we had, not only did it have a lock, but it had a like a metal bar that we could put down to stop it from sliding. That door that we have now doesn’t have that, and the latch is broken. So, that’s how the man got in and out of the apartment.

Greg then softly replied, “Okay.”

19. During the confrontation CPM management did not deny any of the following facts: (1) CPM knew that the door’s lock was broken; (2) CPM told the women that they were responsible for purchasing and installing any additional locks; and (3) CPM’s failure to repair the lock permitted an intruder to come into Plaintiff’s apartment and sexually assault her.

20. With their sense of safety shattered, and the intruder still at large, Plaintiff and her roommate chose to terminate their lease and temporarily stay at an Airbnb while looking for a new place to live. Meanwhile, the intruder continued to terrorize several other women in nearby apartment complexes by breaking in and sexually assaulting them.<sup>1</sup> Police eventually apprehended and arrested the intruder, identified as Octavio Contreras Guzman, after placing hidden cameras around the targeted complexes and finding him peering into windows.

21. Unfortunately, this was not the only string of criminal attacks on or near the apartments in question, which are located approximately two miles from Georgian Acres, one of the most dangerous neighborhoods in Austin, Texas. In 2022, the crime rate in Georgian Acres was 10,925 per 100,000, which is a 365% higher than the national average.<sup>2</sup> According to the Austin Police Department's police reports database, within the two years preceding the assault underlying this suit, the following violent crimes were committed within 2,000 square feet of the apartments in question: 89 burglaries, 81 aggravated assaults, 29 robberies, and 4 homicides.<sup>3</sup>

22. As a result of the sexual assault perpetrated by the intruder—which was facilitated by Defendants' negligent failure to repair the lock on Plaintiff's back sliding glass door—Plaintiff has suffered severe mental anguish, emotional distress, and psychological trauma. Plaintiff is currently in therapy to manage her symptoms related to this incident, including, but not limited to, panic attacks, nightmares, anxiety, intense fear, and paranoia.

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<sup>1</sup> See attached **Exhibit 1** (*Austin Police Hunt Suspect Accused of Breaking into Apartments with Intent to Commit Sexual Assault*, FOX NEWS (Jan. 11, 2023), <https://www.foxnews.com/us/austin-police-hunt-suspect-accused-breaking-apartments-intent-commit-sexual-assault>).

<sup>2</sup> See attached **Exhibit 2** (*Most Dangerous Neighborhoods in Austin*, PROPERTY CLUB (Mar. 25, 2023), <https://propertyclub.nyc/article/most-dangerous-neighborhoods-in-austin>).

<sup>3</sup> See attached **Exhibit 3** (*Crime Search*, AUSTIN POLICE DEPT., <https://maps.austintexas.gov/GIS/CrimeViewer/> (last visited Apr. 24, 2023)).

## VI. CAUSES OF ACTION

### A. Count 1 – Negligence

23. Plaintiff incorporates the preceding paragraphs as if fully set forth herein.

24. Defendants CPM and Avela (collectively “Defendants”), as possessors of the apartments in question, owe their tenants, including Plaintiff, a duty of ordinary care in keeping the premises in a reasonably safe condition.

25. Defendants breached this duty of ordinary care to Plaintiff in many ways, including, but not limited to the following:

- a. Failing to repair the broken lock on the back sliding glass door after receiving multiple oral and written complaints from Plaintiff and her roommate;
- b. Failing to purchase and install a security bar on the back sliding glass door of the apartment, as requested by Plaintiff and her roommate, and as required by Tex. Prop. Code § 92.153(a)(4);
- c. Failing to adequately hire, train, supervise, and retain qualified employees to manage the apartments in question; and
- d. Failing to promulgate and implement adequate security policies and procedures.

26. The breaches by Defendants proximately caused Plaintiff’s injuries and resulting damages, which were a foreseeable result of such negligence. But for Defendants’ negligent failure to repair the broken lock and install all required locks on the back sliding door, Plaintiff would not have been sexually assaulted in her apartment by the intruder. It is foreseeable to a landlord exercising ordinary care—particularly given the pervasive crime in the immediate vicinity of the apartments in question—that failing to repair a broken lock on an exterior door and/or to install all required locks may result in an intrusion and criminal attack on a tenant, just as Plaintiff suffered here.

**B. Count 3 – Negligence Per Se**

27. Plaintiff incorporates the preceding paragraphs as if fully set forth herein.

28. The following statutes govern the conduct of Defendants:

- a. Tex. Prop. Code § 92.052 – Landlord’s Duty to Repair or Remedy;
- b. Tex. Prop. Code § 92.153 – Security Devices Required Without Necessity of Tenant Request; and
- c. Tex. Prop. Code § 92.158 – Landlord’s Duty to Repair or Replace Security Device.

29. Under the preceding statutes, Plaintiff belongs to the class of persons these statutes were designed to protect, and her injuries are of the type of injuries these statutes were designed to prevent.

30. These statutes are ones for which tort liability may be imposed when violated.

31. Defendants violated the statutes without excuse.

32. Defendants’ acts and/or omissions proximately caused Plaintiff’s injuries, and her injuries were the foreseeable result of such negligence per se.

**C. Count 4 – Gross Negligence**

33. Plaintiff incorporates the preceding paragraphs as if fully set forth herein.

34. Each and all of the foregoing negligent acts and omissions, taken singularly or in combination, constitute grossly negligent conduct on the part of Defendants in that such conduct, when viewed objectively from the standpoint of Defendants at the time of its occurrence, involved an extreme degree of risk, considering the probability and magnitude of the potential harm to others; and which Defendants had actual, or subjective awareness of the risk involved, but nevertheless, proceeded with conscious indifference to the rights, safety, and welfare of Plaintiff.



35. Defendants' gross negligence was a proximate cause of Plaintiff's injuries, and her injuries were the foreseeable result of such gross negligence.

36. Because Defendants' conduct amounts to gross negligence, Plaintiff seeks exemplary damages under Tex. Civ. Prac. & Rem. Code Ann. 41.001 *et seq.*

#### **D. Count 5 – Premises Liability**

37. Plaintiff incorporates the preceding paragraphs as if fully set forth herein.

38. Plaintiff, a tenant of the apartments in question, was an invitee.

39. Defendants were possessors of the premises.

40. A condition on the premises—namely, the broken lock on the back sliding glass door and absence of all required locks—posed an unreasonable risk of harm to Plaintiff.

41. Given Plaintiff's repeated complaints about the broken lock and request for additional locks on the back sliding glass door, as well as the pervasive crime in the immediate vicinity of the apartments in question, Defendants knew or reasonably should have known of the danger.

42. Defendants breached their duty of ordinary care by failing to make the condition reasonably safe.

43. Defendants' breach proximately caused Plaintiff's injuries, and her injuries were the foreseeable result of such dangerous condition.

#### **VII. DAMAGES**

44. Plaintiff incorporates the preceding paragraphs as if fully set forth herein.

45. Defendants' conduct proximately caused injury to Plaintiff, which resulted in the following damages:

- a. Past and future mental anguish;

- b. Past and future loss of earning capacity; and
  - c. Past and future medical expenses.
46. The sum of Plaintiff's damages is within the jurisdictional limits of the Court.

#### **VIII. INTEREST**

47. Plaintiff seeks pre-judgment and post-judgment interest as authorized by law.
48. Plaintiff also claims damages in the amount of legal interest as allowed by law on all pecuniary and non-pecuniary damages as found by the jury at the maximum legal rate allowed by law: (a) accruing from a date beginning 180 days after the date Defendants received written notice of this claim or on the date of filing suit, whichever occurred first, until the time judgment against the defendant is rendered and (b) after judgment until same is paid.

#### **IX. JURY DEMAND**

49. Plaintiff demands a jury trial and have tendered the appropriate fee.

#### **X. PRAYER**

50. For these reasons, Plaintiff asks that she be awarded a judgment against Defendants for the following:

- a. Actual damages;
- b. Exemplary damages;
- c. Pre-judgment and post-judgment interest;
- d. Court costs; and
- e. All other relief to which Plaintiff is entitled.

Respectfully submitted,

BLIZZARD GREENBERG, PLLC



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-and-

THE SOLIZ LAW FIRM, PLLC

/s/ Miriah Soliz

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**ATTORNEYS FOR PLAINTIFF**

# **EXHIBIT 1**

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AUSTIN

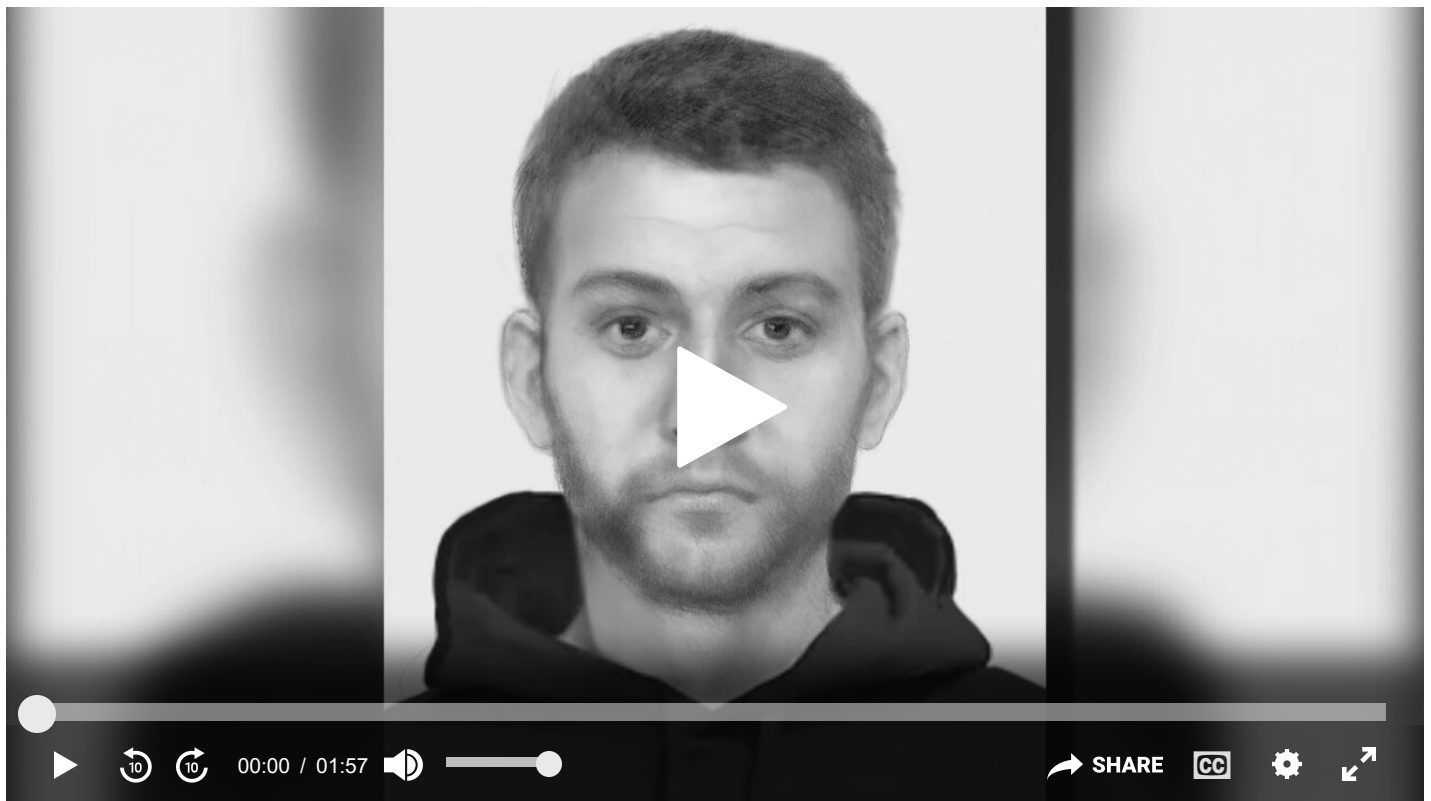
# Austin police hunt suspect accused of breaking into apartments with intent to commit sexual assault

Investigators started looking into cases in December, with most recent incidents days ago



By **Pilar Arias** · Fox News

Published **January 11, 2023** 10:43am EST



## Suspect wanted for breaking into NE Austin apartments with intent to sexually assault victims: APD

Austin police are looking for a suspect in a series of overnight burglaries with intent to commit sexual assault in Northeast Austin apartments. FOX 7 Austin reports.

The [Austin Police Department](#) is asking people living in the community to be vigilant for a man who has been breaking into homes with the intent to commit sexual assault.

Investigators said during a news conference Tuesday that last month they started looking into a series of burglaries with [intent to sexually assault victims](#). The suspect has been targeting victims in apartment complexes near Berkman and US Highway 290 on the northeast side of the city.

The most recent incidents happened in the overnight hours of Jan. 6-7, [FOX 7 Austin reports](#).

Police are not releasing the number of victims who have come forward, but believe there could be more unreported cases. They also do not believe the suspect is targeting a particular type of victim.

## [TEXAS MAN WHO SHOT ROBBER AT HOUSTON RESTAURANT TO BE INVESTIGATED BY GRAND JURY](#)

**White or Hispanic male**

**5'7" to 5'9"**

**Athletic or slender build**

**Age: 30's**

**Short brown hair**

**Possible facial hair**



**Hombre de raza blanca o Hispano**

**Estatura: 1.70m - 1.75m**

**Compleción delgada o atlética**

**Edad: En los 30's**

**Cabello corto castaño**

**Posiblemente con pelo facial**

Austin police are looking for a suspect in a series of overnight burglaries with intent to commit sexual assault in Northeast Austin apartments. (Austin Police Department)

"This type of incident when it's repeated like this is not a common occurrence, but when something like this does happen, all hands come to bare in trying to solve it as quickly as possible," [Austin PD Sex Crimes Unit](#) Sgt. Robert Barger said.

The suspect has been described as a white or Hispanic male, approximately 5'7" to 5'9" in his 30s with a slender athletic build, short brown hair, and possible facial hair.

**[TEXAS EXECUTES FORMER SUBURBAN HOUSTON COP WHO HIRED HITMEN TO KILL WIFE](#)**



Police in Austin, Texas say a man is targeting apartment complexes on the northeast side of town by breaking into homes with the intent to commit sexual assault. (FOX 7 Austin)

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The department believes some victims may be afraid to come forward due to their immigration status.

"We want to assure them that it's important that they contact us, we have no interest in what their status is, and we hope that does not prevent them from reporting, we really need to know about this, and we want to work their case," Austin PD Sex Crimes Unit Lt. Chris Leleux said.



Community members are urged to lock their doors and windows while the search for the suspect continues.



Apartment complexes off Berkman Drive and Highway 290 in northeast Austin appear to be the target of a sex assault suspect. (FOX 7 Austin)

[CLICK HERE TO GET THE FOX NEWS APP](#)

Meetings will be set up with residents living in the targeted apartment complexes, APD said.

Anyone with any information is asked to contact the Austin Police Department at 512-974-TIPS. Tips may be submitted anonymously through the [Capital Area Crime Stoppers Program](#) or by calling 512-472-8477. A reward up to \$1,000 may be available for any information that leads to an arrest. Reference APD case #22-3400147.

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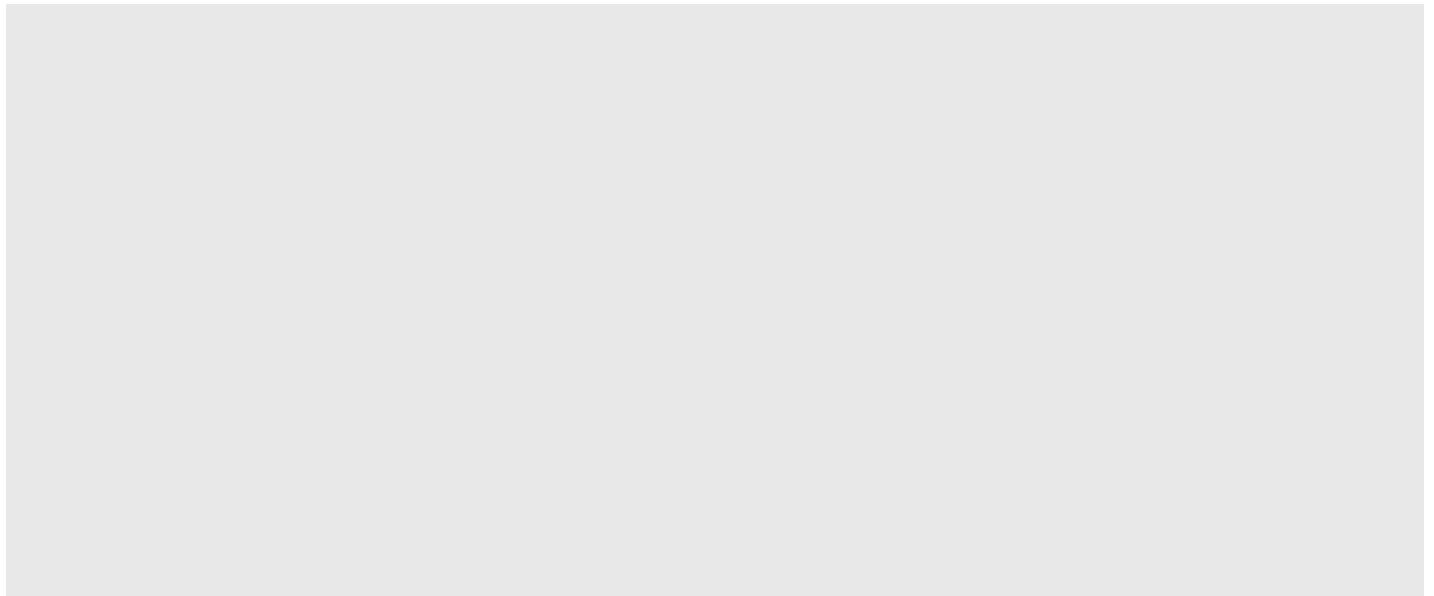
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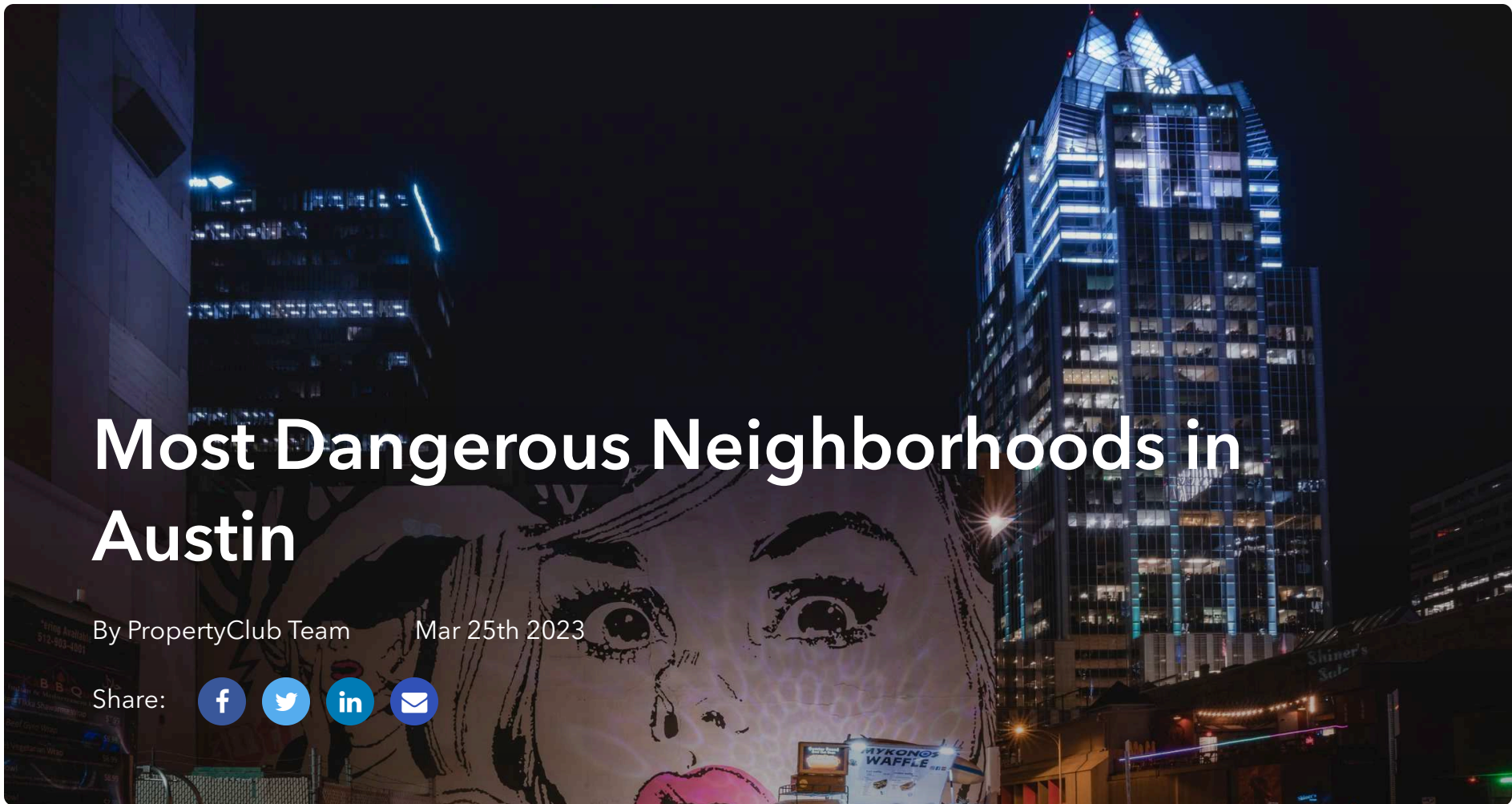
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# **EXHIBIT 2**



# Most Dangerous Neighborhoods in Austin

By PropertyClub Team Mar 25th 2023

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Austin has a reputation for being a great place to live and visit, but there are also horror stories regarding crime associated with the city. Read on to discover the six most dangerous neighborhoods in Austin.

## Is Austin Dangerous?

Austin is a relatively safe city, with crime rates that are lower than other large American cities. Austin's downtown and tourist districts are some of the safest parts of the city. If you stay in these neighborhoods and avoid the worst areas in the city, you won't have to worry much about crime.

Overall, Austin residents have a 1 in 18 chance of becoming the victims of a crime. The most dangerous neighborhoods in the city are generally in the north and central parts of the city.

## 6 Most Dangerous Neighborhoods in Austin

1. Georgian Acres

2. Montopolis

3. Martin Luther King Highway 183

4. Riverside

5. Johnston Terrace

6. Saint Johns

## 1. Georgian Acres

The most dangerous neighborhood in Austin is Georgian Acres. This residential area in north central Austin has a population of 9,600 and the worst levels of crime in the city. The crime rate in Georgian Acres was 10,925 per 100,000 in 2022, which is a whopping 365% higher than the national average. Georgian Acres has a bad reputation, which is well-deserved. However, in recent years parts of the neighborhood have begun to be revitalized. The current median home price stands at just \$90,800.

## 2. Montopolis

Another one of the most violent neighborhoods in Austin is Montopolis. This neighborhood is located in southeast Austin and has a population of 12,211. It has been considered one of the worst parts of Austin for years, as the neighborhood's crime rate is an astounding 302% higher than the national average. With residents having a 1 in 11 chance of becoming the victim of any type of crime, Montopolis is definitely an area that is best left avoided.

### 3. Martin Luther King Highway 183

The Martin Luther King Highway 183 area is another one of the worst Austin neighborhoods for crime. It has a population of 8,366 and a crime rate of 8,250 per 100,000. In 2022, the overall crime rate in the Martin Luther King Highway 183 neighborhood was 252% higher than the national average. This neighborhood is notorious for violent and property crime. This area has been affected by high poverty rates for years, having a median income of \$38,101.

### 4. Riverside

Riverside is another dangerous Austin neighborhood. It has a crime rate of 8,283 per 100,000. Overall, Riverside's crime rate is 248% higher than the national average. Riverside is a growing area that is quickly becoming home to many families looking for affordable housing options. Although the area struggles with high crime rates, violent crime isn't a major issue in Riverside, and most crime involves personal theft and car theft.

### 5. Johnston Terrace

Johnston Terrace is a small community in east Austin with a population of 1,681. The total crime rate in Johnston Terrace is 7,695 per 100,000, which is 228% higher than the national

average. Residents have a strong likelihood of becoming the victim of a crime, with crimes like theft and burglary being common. Despite this, Johnston Terrace is home to many middle-class residents looking for more affordable options within Austin. While the area is affordable, you'll want to always be aware of your surroundings, as it's one of the most dangerous places to live in Austin.

## 6. Saint Johns

Saint Johns is another one of the most dangerous neighborhoods in Austin. Saint Johns is located in central Austin and has a population of 9,414. Crime in Saint Johns is 156% higher than the national average, with a total crime rate of 6,002. Residents have a 1 in 17 chance of becoming the victim of any type of crime. Saint Johns is best described as a working-class neighborhood, having a median home price of \$149,120.

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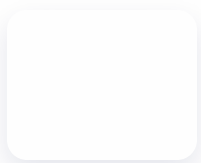
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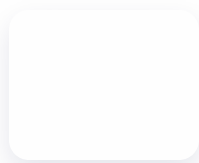
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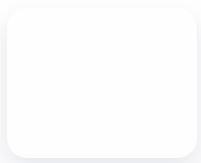
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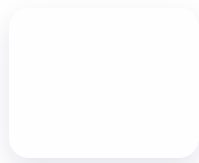
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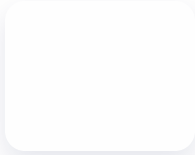
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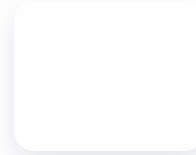
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# **EXHIBIT 3**





# Austin Police Department

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Tool Labels ✕



Address, Intersection & Street Search



Crime Search



Thematic Reports



Query



Filter



Identify



Clear all graphics

Crimes (501)



501 Results Found



(4) Homicide



(29) Robbery



(81) Aggravated Assault



(89) Burglary



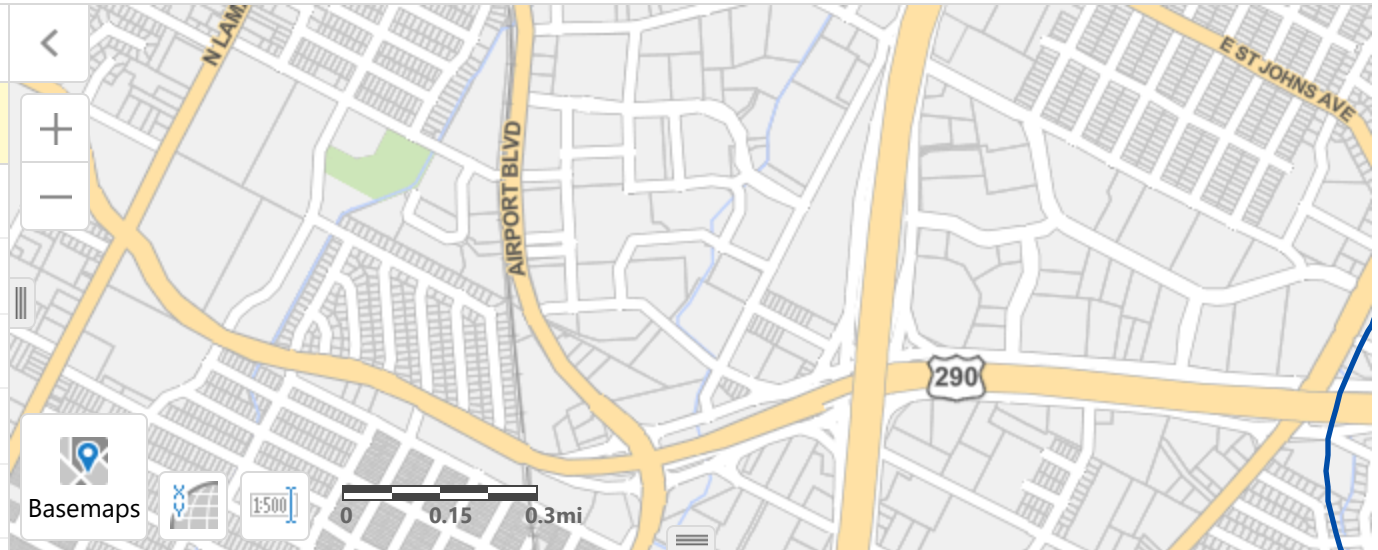
(73) Auto Theft



(218) Theft



(7) Arson



3078340



Object ID  
2724215

Address  
6855

Address Fraction  
1/2

Prefix Direction  
E

Place ID  
3078340

Street Name  
290 HWY

Street Type  
SVRD

Suffix Direction  
EB

Parent Place ID  
1107460



Legend



Crimes (...)



Crime S...



**VELVA L. PRICE**  
 District Clerk, Travis County  
 Civil Division (512) 854-9457

**Process Request Form**

**CASE NUMBER:** \_\_\_\_\_ **COURT:** \_\_\_\_\_  
**NAME(S) OF DOCUMENTS TO BE SERVED:** Plaintiff's Original Petition

**FILE DATE:** 04/24/2024  
Day/Month/Year

**SERVICE TO BE ISSUED ON:** (Please List Exactly As The Name Appears In The Pleading To Be Served- Additional Parties on page 2)

- Issue Service to: Clear Property Management LLC  
 Address of Service: 11149 Research Blvd., Ste. 375  
 City, State & Zip: Austin, TX 78759  
 Agent: (if applicable) PPA Group, LLC

**TYPE OF SERVICE/PROCESS TO BE ISSUED:**

- Citation     Citation by Posting     Citations Rule 106 Service     Hague Convention Citation
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- Other (Please Describe) \_\_\_\_\_

**SERVICE BY (check one):**

- ATTORNEY/REQUESTER:** (Email) agreenberg@blizzardlaw.com
- PROCESS SERVER:** (Email) \_\_\_\_\_
- PICK UP:** (Person/Agency Name and Phone Number) \_\_\_\_\_
- TRAVIS COUNTY CONSTABLE:** Please select PCT if you have a preference     1     2     3     4     5
- CERTIFIED MAIL**
- OTHER, explain:** \_\_\_\_\_

**Requested by:**

Name: Anna Greenberg  
 Mailing Address: 5020 Montrose Blvd., Suite 410  
 City, state, Zip: Houston, TX 77006  
 Phone Number: (713) 844-3750  
 E-mail Address: agreenberg@blizzardlaw.com

Notes/Comments to the clerk: \_\_\_\_\_  
 \_\_\_\_\_

**Civil Process Request Form - Additional Parties**

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**SERVICE TO BE ISSUED ON:** (Please List Exactly As The Name Appears In The Pleading To Be Served)

2. Issue Service to: Avela Real Estate Partners, Inc.  
Address of Service: Corporate Center One, 5301 W. 2nd St., Ste. 1900  
City, State & Zip: Austin, TX 78735  
Agent: (if applicable) Registered Agent Solutions, Inc.

3. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

4. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

5. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

6. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

7. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_