

STATE OF MAINE  
CUMBERLAND, ss.

DISTRICT COURT  
Location: Portland  
Docket No. CV-10-\_\_\_

CITY OF PORTLAND a body politic and )  
Corporate, located in the County of )  
Cumberland and State of Maine, )

Plaintiff, )

v. )

ACE HOLDINGS, LLC, )

and )

OREN ALQUIST, )

Defendants. )

**LAND USE CITATION  
AND COMPLAINT**

**To: Ace Holdings, LLC  
and  
Mr. Oren Alquist  
P.O. Box 10096  
Portland, ME 04104**

**CITATION**

**You are hereby summoned to appear in district court at the location and date indicated below to answer to the enclosed complaint. IN THE EVENT YOU FAIL TO APPEAR AND STATE YOUR DEFENSE ON THE COURT DATE SPECIFIED, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU. You are advised to call the district court to verify the date and time of your appearance.**

**Time and Place of Appearance:**

Court: **Ninth District Court**  
Address: **Cumberland County Courthouse  
205 Newbury Street  
Portland, Maine**

Date: \_\_\_\_\_, 2010

Time: \_\_\_\_\_ a.m.

**Signature of Complainants:**

I have reasonable grounds to believe that the violations described herein were committed because I personally observed and/or recorded these violations.

Date: June \_\_, 2010

\_\_\_\_\_  
Code Enforcement Officer  
City of Portland

Date: June \_\_, 2010

\_\_\_\_\_  
Police Officer  
City of Portland

**COMPLAINT**

**YOU ARE CHARGED WITH THE FOLLOWING:**

**Location of Violations:**      255/259 Oxford Street, Portland, Maine (the “Premises”).

(See Deed and Property Description, attached and incorporated herein collectively as Exhibit A.)

**Disorderly House Violation**

**Violations**

**Statute/Ordinance**

Allowing occupancy of a  
Disorderly House

Portland Code of Ordinances  
Ch. 6, § 6-116.1(a)

(See April 29, 2010 Notice of Violation, attached and incorporated herein as Exhibit B).

**Date of Violations:**

Violation first observed on March 30, 2010, continued thereafter, and remains unabated.

**Building Code Violations**

**Violations**

**Statute/Ordinance**

Unsafe chimneys, flues and vents

Portland Code of Ordinances  
Ch. 6, § 6-108(e)

Improper maintenance of shared areas

Portland Code of Ordinances  
Ch. 6, § 6-109(b)

Improper maintenance of assigned areas

Portland Code of Ordinances  
Ch. 6, § 6-109(a)

Failure to dispose of rubbish, ashes,  
garbage and waste

Portland Code of Ordinances  
Ch. 6, § 6-109(d)

Improper maintenance of lighting fixtures

Portland Code of Ordinances  
Ch. 6, § 6-113(e)

Failure to maintain/repair/replace fire protection

Portland Code of Ordinances

equipment

Ch. 6, § 6-116(e)

(See May 19, 2020 Notice of Violation, attached and incorporated herein as Exhibit C.

See also Attestation of Copies of Official Records Certification, attached and incorporated herein as Exhibit D)

**Date of Violations:**

Violations first observed on May 17, 2010 continued thereafter, and remain unabated.

**Relief Requested:**

- Temporary restraining order:
- Preliminary Injunction
- Permanent Injunction:
- Civil Penalties: \$100 - \$2500 per violation, per day pursuant to 30-A M.R.S. § 4452(3)(A); Portland City Code § 6-1(a)
- Removal of Violations 30-A M.R.S. § 4452 (3)(C); Portland City Code § 6-1(a)(4)
- Attorneys' fees and costs 30-A M.R.S. § 4452(3)(D); Portland City Code § 6-1(a)(5)
- Response Costs Portland City Code §6-131(a)
- Other: Order Defendants to hire a City-approved security company to monitor the Property. Portland City Code § 1-15(c);  
  
Order Defendants to implement a City-approved tenant screening process. Portland City Code § 1-15(c).

WHEREFORE, the City of Portland respectfully requests that the Court grant it judgment against the Defendants, together with the relief referenced above and such other and further relief as the Court deems just and proper.

Date: \_\_\_\_\_, 2010

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Patricia A. McAllister, Bar No. 9826  
Neighborhood Prosecutor  
Portland Police Department  
109 Middle Street  
Portland, ME 04101  
(207) 756-8350

*Attorney for the Plaintiff  
City of Portland*