

# REAL ESTATE LAW SECTION

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## FALL 2017 NEWSLETTER

Title	Page
<b>Greetings from the Section Co-Chairs</b> <b>Kathryn J. Carlisle-Kesling</b> <b>Amy E. Asseff</b>	2
<b>History of Recording and Ohio Standards of Title Examination: A Multi-Year Project</b> <b>Kathryn J. Carlisle-Kesling</b>	4
<b>Land Use Planning – A Zoning Primer</b> <b>Ashley Gault, Tucker Ellis</b> <b>Justin Eddy, Tucker Ellis</b>	11
<b>Parting Ways</b>	15
<b>39<sup>th</sup> Annual Real Estate Law Institute</b>	17



# Greetings from the Section Co-Chairs

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Hello, CMBA Real Property Section Members!

As current acting Co-Chairs of the CMBA Real Property Section, we are pleased to present to you the first Quarterly CMBA Real Property Newsletter. We wanted to take a moment to give you an overview of the year.

The Section goals this year as established by the current Section Council are to provide the following:

- Lunch (along with.....)
- Networking
- Exposure for Membership
- Education
- Volunteer Opportunities

We hope to bring you useful and topical information with each Quarterly Newsletter, and to provide all Section Members an opportunity to share their knowledge and accomplishments with the Section. We will be seeking article submissions from Section Members for each Newsletter, so please keep us in mind if you are looking to publish an article. The next Quarterly Newsletter will be distributed in January, 2018. The deadline for submission is seven (7) days prior to our January scheduled lunch. Please get us your topic suggestion as soon as you are able.

We also hope to provide some light reading as well; as part of the Quarterly Newsletter. Something funny or peculiar will always appear at the end of the Newsletter in “Parting Ways.” Please let us know if you have a good story to share about life as a real property attorney.

This first Quarterly Newsletter includes a great article from Ashley Gault and Justin Eddy of Tucker Ellis entitled “Land Use Planning – A Zoning Primer” and an article summarizing the Ohio State Bar Association Real Property Section Committee on Title Standards’ multi-year project to review, revise and re-write select Standards.

*Continued on following page*

**CMBA REAL ESTATE LAWYERS WORKING FOR #HARVEYRELIEF** - As practicing real property attorneys in Ohio, we can provide invaluable assistance to individuals and businesses that may have been impacted by Hurricane Harvey. Consider tenants, landlords, lenders, borrowers, buyers and sellers, homeowners with insurance claims, and any others who have had their property impacted. Think of the critical observation and examination which is going to occur with the “Casualties” and “Property Insurance” clauses contained in mortgages, sales agreements, leases, etc. Consider the seller property disclosure form, earnest money deposit issues, security deposits held by landlords, loan defaults, need for temporary housing, disaster appeals for FEMA. This message below was sent out by CMBA President Darrell Clay and Executive Director Rebecca McMahan:

*“Ohio Supreme Court Chief Justice Maureen O’Conner issued a call for Ohio attorneys to get involved in helping Texans, pursuant to an amended emergency rule enacted by the Texas Supreme Court permitting out-of-state lawyers to practice Texas law temporarily, even if located out-of-state. It is conceivable that a similar rule might be forthcoming in other locations if they experience wide-scale disruptions in the wake of Irma. The American Bar Association’s Committee on Disaster Response and Preparedness, the Federal Bar Association’s SOLACE (Support of Lawyers/Legal Personnel – All Concern Encouraged) Program, and National Disaster Legal Aid, among others, all have web pages with information about helping persons impacted by Harvey and other natural disasters. Legal needs in the wake of a natural disaster are far-reaching and acute, including filing insurance claims and negotiating property settlements, applying for federal disaster aid, handling evictions, and more.”*

We hope you will consider registering and if you do please write an article or short synopsis about your experience for our next newsletter!

Finally, we want your feedback on how we can improve our section. Feel free to call or email anytime. Our contact information is: Kathryn J. Carlisle-Kesling, 440-669-8696, [Carlisle@buckleyking.com](mailto:Carlisle@buckleyking.com); Amy E. Asseff, 216-566-5724, [Amy.Asseff@ThompsonHine.com](mailto:Amy.Asseff@ThompsonHine.com).

Best Regards,

Kate & Amy



## History of Recording and Ohio Standards of Title Examination: A Multi-Year Project

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It was not an English custom to have a general public registration system but there was a practice of recording real estate documents and land registrars were appointed. The holders of real estate documents were important for the same reason they are today; to create a system of registration to prove the rights of persons who first made (and make) claims to property. Public recording of deeds, mortgages and leases and other instruments related to a land title began in the Plymouth and Massachusetts colonies, in or around 1640. The practice was expanded to the Northwest Territory formed in 1787. The recorders of each of the 88 Ohio counties are the “keepers” of land records and have been since the State of Ohio was formed in 1803, when the first state legislature mandated that a recorder be appointed by the Judges of the respective county’s Court of Common Pleas.

In 1829, the recorder became an elected position and, in 1936, the term was established at four years. RC §317 was enacted to codify duties and obligations of a county recorder in October, 1953. The recording acts generally do not affect the validity of a deed, lease, or other instrument. The primary function is to protect purchasers for value and lien creditors against prior unrecorded interests. Equity refused to enforce prior hidden equitable interests against bona fide purchasers of legal title. Therefore, for example, mortgage lenders would search title and land records to verify (a) that the borrower owns the property, and (b) that there are no liens or claims recorded against the property which may be adverse to the priority of the lender. Another function is to preserve important documents and safekeeping by a governmental/public office, which allows for easy admittance into evidence in judicial proceedings, without producing an original.

## **History of Recording and Ohio Standards of Title Examination: A Multi-Year Project**

The Ohio Standards of Title Examination (the “Standards”) relate to the examination of recorded documents and understanding real property title interests. The Model Title Standard 2.1 references an “Examining Attorney’s Attitude”, “A title attorney may be asked to determine whether or not the title in question is in fact marketable and which is shown by the record to be marketable and subject to no other encumbrances than those expressly referenced in the client’s sales contract.” When should objections be made? The Standards express the practice considered reasonable by the Ohio State Bar Association, and serve as an assistance guide. They help to eliminate technical objections which do not impair marketability and some common objections which are based on outdated statute commonly misinterpreted statute. Most of the fifty states have their own version of title standards and Model Title Standards, by Lewis M. Simes and Clarence B. Taylor, the University of Michigan, 1960, are more uniform in nature.

The Standards are currently being revised for adoption by the Ohio State Bar Association Real Property Law Section Council, Committee on Title Standards (the “Committee”) and subsequently approved by the Council of Delegates. The Standards were adopted in 1952 with occasional updates to certain Standards occurring since that time. This is the first comprehensive overhaul of the Standards since adoption. Not all 53 Standards will undergo change; however, as statutory law, formative case law, and attorney standard practice has continued to develop, many of the Standards will undergo significant reconstruction.

As furnished to the Council of Delegates, in April, 2017, the primary purpose of the Standards is to promote uniformity of practice pertaining to the marketability of title of real property in the State of Ohio. While not statutory, these Standards establish a framework for customary practice in examining a property title, land title law, and the marketability of title based upon existing statutes and case law. The Standards have played a significant role in promoting the certainty and continuity of Ohio’s principles of real property law.

## History of Recording and Ohio Standards of Title Examination: A Multi-Year Project

The Committee's review of the Standards began in May of 2016. On April 28, 2017 the first of the revised Standards were presented to the Ohio State Bar Association Council of Delegates and were ultimately approved. Any substantive changes are noted with the year "2017" at the end of the Standard. Recall that Standards are presented through the format of "problems" and "answers" with corresponding "comments." This format has remained the same. New Standards and problems have been added which identify new laws, cases or particular Standards. The Standards (including the recently adopted) is available online to members of the Ohio State Bar Association. They can be found at:

<https://www.ohiobar.org/ForLawyers/MemberResources/LegalResources/Pages/StaticPage-101.aspx>.

The select Standards, amended April 2017, were Standard 2.1 which dealt with discovery of a defect in title that was previously examined by another, and Standards 3.2, 3.3, 3.4, and 3.5 which dealt with descriptions, delivery of deeds, creation of survivorship estates and conveyances by partnerships. Highlighted below are the Standards that underwent the most change. As review of the Standards continues, expect to see more changes moving into 2018 and 2019. The current revised version is in italics.

### *2.1 EXAMINATION-DISCOVERING DEFECT IN TITLE PREVIOUSLY EXAMINED BY ANOTHER*

*Problem A:*

*When an attorney examines a title that is believed to be unmarketable or brings into question whether there is a marketable record title, what steps should be taken if the attorney has knowledge that the same title has been examined by another attorney, and the examining attorney has not objected to the defect?*

*Should the attorney communicate with the other attorney?*

**(Prior Problem A: When an attorney examines a title which he believes should not be approved and he knows that another attorney has approved it, should he communicate with the other attorney?)**

## History of Recording and Ohio Standards of Title Examination: A Multi-Year Project

Standard A:

*Yes, if practicable, it is recommended that the attorney should communicate with the previous examiner, explain the matter objected to and an opportunity should be afforded for discussion, explanation, and correction. The attorney contacted should cooperate fully and promptly in investigating his/her records and taking whatever steps are necessary to explain and/or correct the title defect complained of.*

*(Effective as amended April 28, 2017, originally effective November 1, 1952)*

**(Prior Standard A: Yes, if practicable, an opportunity should be afforded for discussion and correction).**

Some of you may be surprised by this Standard but it exemplifies the importance of having an attitude of civility and the pro-active self-patrol our industry has put in place to clear titles (which is very much in the vein of the title insurance industry as well). In a book published a few years ago shortly after the recession, the author strongly criticized the title insurance and escrow services industry and questioned what is actually being accomplished; for the cost to consumers. I believe this to be misplaced. Escrow and title agents, as well as title attorneys frequently take corrective actions to insure future title claims and clear back title issues.

The above revision accomplishes a few different points. It replaces the rather unclear “should not be approved” language with the scope of review being in the context of “marketable record title” or if believed to be “unmarketable.” It further expands, in Standard A, the importance that attorneys cooperate and work together.

### 3.4 CONVEYANCES-SURVIVORSHIP

Problem A:

*What language creates an estate with right of survivorship?*

## History of Recording and Ohio Standards of Title Examination: A Multi-Year Project

### Standard A:

*Where the operative words of a deed clearly express an intention to create the right of survivorship, such expressed intention will be given effect and the survivor will take by force of the terms of the grant. Upon the death of the other grantee or grantees, the survivor acquires the entire estate, subject to the charge of death taxes.*

*A conveyance is sufficient to create an estate with right of survivorship when it contains “to A and B for their joint lives, remainder to the survivor of them, ” or substantially similar language. To be sufficient the conveyance should contain the names of the grantees and a reference that the survivor is entitled to the remainder.*

***(Prior Second Paragraph: A conveyance is sufficient to create an estate with right of survivorship which it contains “to A and B for their joint lives, remainder to the survivor of them, his or her heirs or assigns” or the like. A conveyance is not sufficient to create an estate with right of survivorship which it contains “to A or B”; to “A or B, their heirs or assigns”; “to A or B or his hers and assigns”; “to A and B or the survivor”, or)***

*Any deed or will containing language that shows a clear intent to create a survivorship tenancy shall be liberally construed to do so. Use of the word “or” between the names of two or more grantees or devisees does not by itself create a survivorship tenancy, but shall be construed and interpreted as if the word “and” had been used between the names. R.C. Sec. 5302.20.*

### Comment A:

*Revised Code Section 5302.20 became effective on April 4, 1983.*

*(Effective as amended April 28, 2017; as amended November 11, 1989; originally adopted November 1, 1952, and amended May 8, 1969)*

## History of Recording and Ohio Standards of Title Examination: A Multi-Year Project

Problem D:

*What is the effect of a deed that contains the names of the grantees and a reference that the survivor is entitled to the remainder that does not state the marital status of the grantees?*

Standard D:

*The failure to cite the grantees' marital status does not make the survivorship tenancy defective.*

*(Effective April 28, 2017)*

The above revision to Standard 3.4 which addresses necessary language needed to create an estate with the right of survivorship struck "his or her heirs or assign" and reframed the question in terms of the use of substantially similar language. If substantially similar language is used then a survivorship tenancy would be created. Problem D is new and addresses the marital status of a grantee and the efficacy of the survivorship tenancy when omitted.

### 3.5 CONVEYANCES-PARTNERSHIP

Problem A:

*What should be required to show the authority of partners to execute conveyances on behalf of the partnership?*

Standard A:

*A conveyance from a partnership holding the title is sufficient if it recites that the partners executing it are all the partners, in the absence of information to the contrary. When it does not appear that all the partners executed the conveyance, satisfactory evidence of authority, **such as a resolution or a certified copy of a Statement of Partnership Authority pursuant to 1776.33(D)(2), should be required. Any such evidence of authority should be signed by all the partners in order to be considered satisfactory. [Added language]***

## History of Recording and Ohio Standards of Title Examination: A Multi-Year Project

*Authority of the partner or partners executing the conveyance should be presumed after it has been of record for five years.*

*(Effective as amended April 28, 2017, originally effective November 1, 1952)*

Title Standard 3.5 addresses conveyances by a partnership and evidence of authority to execute conveyances on behalf of a partnership. Ohio's adoption of the Revised Uniform Partnership Act, or portions thereof, as applicable to transfer of partnership property and establishment of partnership authority is the basis for the proposed revisions.

Presumably, many members of the committee (and career title lawyers) like me, enjoy working with Ohio's historical records and maps and find nostalgia in remembering the "old days" of searching grantor and grantee indexes. They also have an appreciation for understanding the nuances of real estate law which the Standards reveal.

All lawyers, young and "mature" alike, should never analyze a property title without the Standards in hand. As my mentors taught me, all decent "Dirt Lawyers" have to know how to search title and understanding these Standards is essential. The Standards are not tangled and verbose with fillers such as "hereof, thereof, hereinafter, whereby..." They are practical and useful. During the more than 65 years since their initial publication, the Standards have come to be regarded as an authoritative reference on the law of land title and title examination and review. They have been quoted in court opinions (i.e. *Heifner v. Bradford*, 4 Ohio St. 3d 49, 446 N.E. 2d 440, (1983), *Centex Home Equity Co. v. Williams*, 2006 Ohio Misc. Lexis 503), presented to juries, and discussed in law blogs. While some may view these Standards as outdated and not utilized by title attorneys, they are consulted every day and provide invaluable guidance to our industry. Thank you, fellow Committee members for your dedication having devoted precious time, thought and energy to this project and the improvement of the Standards.



## Land Use – A Zoning Primer

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Zoning is the practice of dividing land into separate districts with different uses<sup>1</sup> with the goal of promoting the general welfare and protecting property values by establishing the most appropriate use of land. Ohio cities derive their power to enact zoning and land use regulations from the Ohio Constitution, Article XVIII, Section 3<sup>2</sup>. In *Village of Euclid, Ohio v. Ambler Realty Co.*, a famous case that hits close to home, the constitutionality of comprehensive zoning as an exercise of local police power was established. Zoning is the most powerful tool for municipalities to employ for land use planning, allowing them to shape defined districts within their boundaries (often in conformance with a master plan) and to build thriving communities where people want to live and work.

### Use and Area Regulations

Within each use district (*i.e.*, single-family residential, multi-family, commercial, and industrial), municipalities establish regulations related to occupancy limits, setbacks, minimum lot size, maximum building height, maximum floor area, signage, and minimum parking—all requirements a project must meet to be considered “legal.”

### Overlay Districts

Zoning overlay districts are an interesting subcategory of zoning not to be overlooked. An area with primary zoning (residential/commercial/industrial) may also have a zoning overlay district that imposes additional regulations on the development of a particular area. For example, the City of Cleveland has established various overlay districts, including the Design Review District (“designed to enhance the visual

## Land Use Planning – A Zoning Primer

image of downtown Cleveland” and to “preserve Cleveland’s architectural assets”)<sup>3</sup> the Urban Core Overlay District (“established to foster the development of dense, vibrant, mixed-use neighborhoods that encourage a quality pedestrian experience”),<sup>4</sup> and the Urban Form Overlay District (“established to foster a high level of walkability and design quality for Cleveland’s urban streets”).<sup>5</sup> Indeed, overlay districts help foster cohesive, responsible, and desirable development, but generally require a developer to jump through hoops and seek additional approvals to get a building permit and move forward with its project.

### Variances

So what happens when a project doesn’t fit the specific land use regulations? For non-conforming uses (*i.e.*, uses that do not technically fit within the perimeters of the city’s zoning code for a certain area), a “use variance” or “special use permit” can be sought. A use variance typically involves an appeal to the local zoning board of appeals (aka “BZA”). A use variance requires an applicant to show that the enforcement of the use designation will cause “unnecessary hardship” or that it is not economically feasible to restrict the property to a permitted use under its present zoning classification due to characteristics unique to the property.<sup>6</sup>

“Area variances”, or deviations from the various dimensional requirements, are subject to a lesser standard. In granting an area variance, the BZA must find that denial would result in a “practical difficulty” for the applicant. The Ohio Supreme Court, in *Duncan v. Middlefield*<sup>7</sup> established the specific criteria to be considered when determining whether a practical difficulty exists.

### Playing Politics

Local politics can play a major role in whether a developer’s project will be approved by the city under its zoning code. Good practice for developers and lawyers is to put on their “lobbyist hats” and engage stakeholders to tout the communal benefits of their project. Developers and lawyers should also listen to how the project might be improved.

## Land Use Planning – A Zoning Primer

Building consensus is key. Support from the business community — trade associations, chambers of commerce, and the community’s economic development department — will help promote the benefits of your project and is often the convincing factor. All politicians love to say they’ve created jobs. Developers should anticipate engaging these groups along with the local administration before filing any zoning request to better understand the local attitudes and political landscape and shape an appropriate strategy. The importance of law directors cannot be overstated in this process. Experience shows that they are typically the conduit to stakeholders and can give developers practical advice on who to approach and how to approach them.

If the project is in an area with neighboring commercial and residential uses, organize a community meeting with those who live near the project site. Community meetings can help the developers develop a game plan to vet the project on a grassroots level and find ways to ward off criticisms at the outset. Generally the city council is the best means to do this, and reaching out early with this request will make a positive impression on them and those who are likely to show up at BZA hearings and other public meetings.

### Exactions

Developers should expect that officials or the public will seek to “exact” (as that term is used in the legal sense under *Nollan and Dolan*)<sup>8</sup> certain conditions in connection with any project, such as an impact fee. That’s not meant to be critical — many times favorable ideas come out of such requests, and lawyers should counsel clients to listen and do what they can, particularly with the public. But there is a line, and public officials can cross it. Under *Nollan and Dolan*, there must be a “nexus” and “rough proportionality” between the government’s demand and the effects of the proposed land use, and conditions that do not meet this standard will be deemed a “taking” in violation of the Fifth Amendment.

## Land Use Planning – A Zoning Primer

### Administrative Appeals

It may come as no surprise that city officials don't always follow these standards, or, in some cases, their own zoning code when a project is unpopular.<sup>9</sup> If this happens, an applicant may seek judicial review of the administrative decision via Ohio Revised Code Chapter 2506. Under judicial review, the common pleas court weighs the evidence in the record and whatever additional evidence is admitted pursuant to the Ohio Revised Code to determine whether a preponderance of the reliable, probative, and substantial evidence exists to support the agency's decision.<sup>10</sup>

### Constitutional Challenges

Applicants can also challenge the constitutionality of the zoning code either by an administrative appeal under Revised Code Chapter 2506 or by a declaratory judgment action pursuant to Revised Code Chapter 2721.<sup>11</sup> Constitutional attacks can be brought under both the United States and Ohio Constitutions in either federal or state courts and encompass claims related to procedural and substantive due process, equal protection, takings, privacy rights, and the First Amendment.

It is important for developers and their counsel to take a comprehensive view of the various zoning issues at play in any given project. Ignoring the legal standards and, perhaps more importantly, the political landscape can prove fatal. Crafting a sound strategy at the outset and engaging the government early in the process will help ensure a successful development.

<sup>1</sup> *Zoning*, Black's Law Dictionary, 10<sup>th</sup> Edition (2014).

<sup>2</sup> *Gerijo, Inc. v. Fairfield*, 70 Ohio St.3d 223, 225 (1994). Counties and townships derive their zoning power from the Revised Code—their zoning authority is much narrower, and cannot deviate from statute. See R.C. 303.02 and 519.02.

<sup>3</sup> Section 341.01, *Purpose of Chapter 341, Design Review*, City of Cleveland.

<sup>4</sup> Section 348.05, *Urban Core Overlay*, City of Cleveland.

<sup>5</sup> Section 348.01, *Urban Form Overlay*, City of Cleveland.

<sup>6</sup> *Hulligan v. Bd. of Zoning Appeals*, 59 Ohio App.2d 105, 109, 392 N.E.2d 1272, (1978) quoting *Fox v. Johnson*, 28 Ohio App.2d 175, 181, 275 N.E.2d 637 (1971).

<sup>7</sup> *Duncan v. Village of Middlefield*, 23 Ohio St.3d 83, 86, 491 N.E.2d 692 (1986).

<sup>8</sup> *Nollan v. California Coastal Commission*, 483 U.S. 825 (1987) and *Dolan v. City of Tigard*, 512 U.S. 374 (1994).

<sup>9</sup> E.g., *Speedway, L.L.C. v. Berea Planning Comm.*, 8th Dist. No. 99341, 2013–Ohio–3433.

<sup>10</sup> R.C. 2506.04; R.C. 2506.03; *Dudukovich v. Lorain Metro. Hous. Auth.*, 58 Ohio St.2d 202, 207, 389 N.E.2d 1113 (1979).

<sup>11</sup> *Karches v. Cincinnati*, 38 Ohio St.3d 12, 15 (1988); *Driscoll v. Austintown Associates*, 42 Ohio St.2d 263 (1975).



## Parting Ways: Signs, Signs, Everywhere There's Signs

I was strolling around the neighborhood walking my dog and I stumbled upon a home with the most peculiar yard signs.

"No Entry. This is My Home. No Consent to Entry. No Exceptions. I Assert My 4th Amendment Rights."

There was another in the side yard.

"The Implied License Discussed By the United States Supreme Court In *Breard v. Alexandria*, 341 U.S. 622 (1951) & *Florida v. Jardines*, 133 S. Ct. 1409 (2013) is HEREBY REVOKED" See *United States v. Carloss*, No. 13-7082 (10th Cir. 2016)(Gorsuch, J., Dissenting)

My first thought was that the signs were clever and then I tried to recall if any of the last ten association rules and/or CC&R's, which I have reviewed, contained a restriction about yard signs such as these. These are not to be defined exactly as public political advertising signs (R.C. 3517.105 (1), and certainly not for sale or rent signs, but a sign of a very different sort. I have also noticed many signs in the new community where I live about supporting diversity and our immigration community, supporting tribal lands, supporting national park preservation, supporting the soccer team and the graduate. I was reminded that association clients need to review their signage rules. Owners moving into a new community with an association need to consult with their association governing documents to see what they say about signs. Local laws also should be consulted.

The yard signs about no entry and no implied license are made by Fourth Amendment Security "Assert Your Rights". They are called LAWnSigns. This public education project was started by Professors Stephen Hendersen at the University of Oklahoma and Andrew Guthrie Ferguson at UDC David A. Clarke School of Law. It is a project to spread awareness about constitutional education and land ownership.

The professors share their reasons for starting this awareness project: The idea was spawned from an article published in the Ohio State Journal of Criminal Law written to point out the Fourth Amendment and its "absurdities and limitations". *Florida v. Jardines*, was the focus of the article which involved a drug sniffing dog, front porch, marijuana, a door knocker, thoughts of a bloodhound exploring the garden and arguments about to whom homeowners give permission ("license") to approach their homes. Justice Scalia delivered the opinion of the Court as to "whether using a drug sniffing dog (without a warrant) on a homeowner's porch to investigate the contents of the home is a "search" within the meaning of the Fourth Amendment." The Supreme Court decided that police with drug sniffing dogs were generally not permitted to sniff around your front door which is apart of the home's curtilage or homestall, but based this holding



## **Parting Ways: Signs, Signs, Everywhere There's Signs**

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on an implied right of entry on the social customs of peddlers, pamphleteers, aluminum-siding salesmen, and girl scouts. The implied license typically permits the visitor to approach the home by the front porch, knock promptly, wait briefly to be received, and then leave (absent invitation to linger). A policeman may approach and knock but may not explore the area with a trained dog for purposes of discovering incriminating evidence. There is no customary invitation to do this.

Here's to "sign expression" and the constitution!

### **Upcoming Real Estate Law Section Meeting**

**Tuesday, October 12, 2017**

Topic:

The project history and challenges facing permitting the first offshore wind project in freshwater in North America

Presenter:

Beth A. Nagusky

Director of Sustainable Development

Lake Erie Energy Development Corporation

# 39th Annual Real Estate Law Institute



**November 9 and 10, 2017**  
**CMBA Conference Center**

Now in its 39th year, the CMBA's Real Estate Law Institute is must-see CLE for real estate attorneys in Cleveland. With two days of programming and networking opportunities, you're sure to come away from the Institute with new perspectives and new connections.

Here's what we have on deck:

Current Developments

One Size Does Not Fit All: Leasing 1.0

Getting It Back: FastTrack Foreclosure Updates

Mineral Rights - Can You Dig It?

"Trumped" Up Changes to Wetland and Stream Permits

Hello, Did Anyone See Where My Data Went?

Not in my Backyard ≠ This Land is My Land

At the Corner of Bitter and Sweet - Mixed Use Leasing 2.0

Covering Your Asset - Insurance for Dummies

In Through the Out Door: §365 Lease Rejection and Other Bankruptcy Considerations

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