



IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
MUNICIPAL DEPARTMENT - FIRST DISTRICT

UNOFFICIAL COPY

05M1-401350

City of Chicago, a municipal corporation, )  
Plaintiff )  
V. )  
CESAR CARCHI )  
FIRST FRANKLIN FINANCIAL CORP. )  
RENEE ZAPART )  
Unknown owners and non-record claimants )  
Defendants

Case No. \_\_\_\_\_  
Amount claimed per day \$4,000.00

COMPLAINT FOR EQUITABLE AND OTHER RELIEF

Plaintiff, City of Chicago, a municipal corporation, by Mara S. Georges, Corporate Counsel, by the undersigned Assistant(s) Corporation Counsel, complains of Defendants as follows:

Count I

1. Within the corporate limits of said city there is a parcel of real estate legally described as follows:

13-22-124-001

LOTS 19 AND 20 IN BLOCK 3 IN L.E. CRANDALL'S GRAYLAND SUBDIVISION OF THE NORTHWEST 1/4 OF SECTION 22, TOWNSHIP 40 NORTH, RANGE 13 EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY ILLINOIS,, EAST OF THE THIRD PRINCIPAL MERIDIAN IN COOK COUNTY, ILLINOIS.

Commonly known as

4647 - 4649 W PATTERSON AVE CHICAGO IL 60641-

and that located thereon is a

1 Story(s) Building

5 / 0 Dwelling Units

0 Non-Residential Units

2. That at all times pertinent thereto on information and belief the following named defendants owned, maintained, operated, collected rents for, or had an interest in the said property on the date(s) herein set forth.

CESAR CARCHI , BUILDING OWNER

FIRST FRANKLIN FINANCIAL CORP. , MORTGAGE HOLDER

RENEE ZAPART , LAST TAXPAYER OF RECORD

Unknown owners and non-record claimants

3. That on 07/28/2005 and on each succeeding day thereafter and on numerous other occasions, the defendant(s) failed to comply with the Municipal Code of City of Chicago as follows:

1 NC2011

Failure to submit plans prepared, signed, and sealed by a licensed architect or registered structural engineer for approval and obtain permit. (13-32-010, 13-32-040, 13-40-010, 13-40-020)

sr #05-01111133 submit plans and permits for apartments added to original store front including walls plumbing and electric fixtures original three unit now five exist