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

CITY OF CHICAGO, a municipal corporation,
Plaintiff,
v.
Vanesha Jackson
Defendant(s).

CASE NO.: 09 MI 403003

ADDRESS: 9234 S. Drexel Ave.

Courtroom 1101, Richard J. Daley Center

ORDER OF PERMANENT INJUNCTION
AND OF JUDGMENT AND ENFORCEMENT

This matter coming on to be heard on the regular trial call and on motion of plaintiff, CITY OF CHICAGO, and this Court having jurisdiction over the parties and subject matter, and being fully advised in the premises;

IT IS HEREBY ORDERED THAT:

1. The judgment(s) hereby entered on the date(s) of 3/25/10 in the total amount(s) of \$ 400.00 plus \$60.00 in court costs against defendant(s) Vanesha Jackson shall stand as final judgment(s) and that leave for enforcement on said judgment(s) is granted Plaintiff, CITY OF CHICAGO, instanter. Execution is to issue instantly, stand for 60 days.
Count I is dismissed as to all other defendants not named above.

2. Defendant(s) Vanesha Jackson his/her/their agents, heirs, successors or assigns are permanently enjoined and restrained from renting, leasing, using, or occupying the entire premises until full compliance with the City of Chicago Codes as stated in this cause and further order of court.

3. Defendant shall arrange an interior inspection of the building within 7 days after each compliance date stated in this order. Defendant shall call the inspector at 744- or send written request to the Department of Buildings.

4. This matter is off the court's call. The court reserves jurisdiction of this matter for the purposes of modification, enforcement or termination of this permanent injunction, including the adjudication of contempt proceedings if the permanent injunction is violated which could result in the imposition of a fine and/or incarceration.

6. This order is final, enforceable, and appealable, the court finding no just cause or reason to delay its enforcement or appeal.

HEARING DATE: 3/25/10

Atty ID #90909 Mara S. Georges, CORPORATION COUNSEL
By: _____
Assistant Corporation Counsel
30 N. LaSalle Street, Room 700
Chicago, Illinois 60602 312/744-8791

Judge Pleasant 1105

1107 25 2010
Circuit Court 1704

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

09M1 403003

CITY OF CHICAGO, a municipal corporation,)
 Plaintiff)
 V.)
 VANESSA JACKSON)
 COMMUNITY LENDING, INC.)
 HOME Q SERVICING CORPORATION F/K/A TMS)
 MORTGAGE, INC.)
 MORTGAGE ELECTRONIC REGISTRATION)
 SYSTEMS, INC. NOMINEE FOR COMMUNITY)
 TRUST CORP MORTGAGE CO F/K/A ST JOSEPH)
 MORTGAGE CO., INC ASSIGNEE TO AMERICAS)
 Unknown owners and non-record claimants)
 Defendant.)

) Case No. _____
) Amount claimed per day 2,000.00
) Address:
) 9234 - 9234 S DREXEL AVE CHICAGO IL
) 60619-

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:

25-02-309-007

LOT 8 IN BLOCK 13 IN WILLIAM V. JACOB'S SUBDIVISION OF BLOCKS 10 TO 12 INCLUSIVE OF CALUMET AND CHICAGO CANAL AND DOCK COMPANY'S SUBDIVISION OF THE WEST 3/4 OF THE SOUTH 1/2 OF THE SOUTHWEST 1/4 OF THE NORTHWEST 1/4 OF SECTION 2, ALL THAT PART OF THE SOUTH 1/2 OF THE SOUTHWEST 1/4 OF THE NORTHWEST 1/4 OF SECTION 2, LYING EAST OF THE ILLINOIS CENTRAL RAILROAD, ALL THAT PART OF THE NORTHWEST 1/4 OF THE SOUTHWEST 1/4 OF SECTION 2, LYING EAST OF THE ILLINOIS CENTRAL RAILROAD AND THE WEST 3/4 OF THE NORTH 1/2 OF THE NORTHEAST 1/4 OF THE SOUTHWEST 1/4 AND THE WEST 3/4 OF THE SOUTH 1/2 OF THE NORTHEAST 1/4 OF THE SOUTHWEST 1/4 OF SECTION 2, TOWNSHIP 37 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

Commonly known as

9234 - 9234 S DREXEL AVE CHICAGO IL 60619-

and that located thereon is a

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- 1 Story(s) Building
- 1 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.

VANESSA JACKSON , OWNER
 COMMUNITY LENDING, INC. , MORTGAGE HOLDER
 HOME Q SERVICING CORPORATION F/K/A TMS MORTGAGE, INC. , MORTGAGE HOLDER
 MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC. NOMINEE FOR COMMUNITY ,
 MORTGAGE HOLDER
 TRUST CORP MORTGAGE CO F/K/A ST JOSEPH MORTGAGE CO., INC ASSIGNEE TO
 AMERICAS , MORTGAGE HOLDER
 VANESSA JACKSON, POSSIBLE INTERESTED PARTY
 Unknown owners and non-record claimants

3. That on 10/22/2009 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 CN046013
 Stop using cooking or water heating device as heating device. (13-196-400)
 electrical heaters.
 Location: INTERIOR:001 :all rooms SEQ #: 001

2 CN132046
 Provide and maintain every facility, piece of equipment, or utility in safe and sound working
 condition. (13-196-400, 13-196-440)
 gas services shut off.
 Location: INTERIOR:-1 :basement SEQ #: 002

3 CN197019
 Install and maintain approved smoke detectors. (13-196-100 thru 13-196-160) Install a smoke
 detector in every dwelling unit. Install one on any living level with a habitable room or unenclosed
 heating plant, on the uppermost ceiling of enclosed porch stairwell, and within 15 feet of every
 sleeping room. Be sure the detector is at least 4 inches from the wall, 4 to 12 inches from the
 ceiling, and not above door or window.
 no smoke detectors.
 Location: INTERIOR:001 :all SEQ #: 003

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4

CN197087

Install carbon monoxide detector within 40 feet of every sleeping room in residential structure. (13-64-190, 13-64-210) A carbon monoxide detector is needed whenever there is a heating appliance on the premises that burns fossil fuel such as gas, oil, or coal, or air that is circulated through a heat exchanger. Install according to manufacturer instructions. A hard wired model requires an electrical wiring permit. In a single family residence, be sure the detector is on or below the lowest floor with a place to sleep. In a multiple dwelling residence heated by a boiler, install a detector in the same room as the boiler. Otherwise, each apartment follows single family guidelines. The owner is responsible for installation and written instructions, the tenant for testing, maintenance, and batteries.

no detector.

Location: INTERIOR:001 :all

SEQ #: 004

*** End of Violations ***

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4. That Richard Monocchio is the Commissioner of the Department of Buildings of City of Chicago, and as such and pursuant to the Building Code of City of Chicago, caused inspection(s) to be conducted by inspectors of the Department of Buildings of City of Chicago, who have knowledge of the facts stated in this complaint.

5. That this proceeding is brought pursuant to the provisions of the Municipal Code of Chicago, and Chapter 65, Section 5/11-31-1, 5/11-31-2, and 5/11-13-15 of the Illinois Compiled Statutes, as amended.

Wherefore, plaintiff prays for a fine against the defendants, as provided under 13-12-020 of the Municipal Code of Chicago, in the amount indicated on the heading of the Complaint for each day said violations have existed and/or exist, said fine computed in accordance with Section 13-12-040 of the Municipal Code of Chicago.

Count II

Plaintiff, City of Chicago, a municipal corporation, realleges the allegations of paragraphs one through five of Count I as paragraphs one through five of Count II and further alleges:

6. That the levying of a fine is not an adequate remedy to secure the abatement of the aforesaid municipal code violations and the public nuisance which they constitute, and that it is necessary that a temporary and permanent injunction issue and, if necessary, that a receiver be appointed, to bring the subject property into compliance with the Municipal Code of Chicago.

7. That Richard Monocchio, the Commissioner of the Department of Buildings, City of Chicago, has determined said building does not comply with the minimum standards of health and safety set forth in the Building Code.

WHEREFORE, PLAINTIFF PRAYS:

- a. For a temporary and permanent injunction requiring the defendants to correct the violations alleged in the complaint and to restrain future violations permanently pursuant to 65 ILCS 5/11-31-1 (a), 5/11-31-2 and 5/11-13-15 and 13-12-070 of the Municipal Code.
- b. For the appointment of receiver, if necessary, to correct the conditions alleged in the Complaint with the full powers of receivership including the right to issue and sell receivers certificates in accordance with Section 5/11-31-2 of Chapter 65 of the Illinois Compiled Statutes, as amended.
- c. For an order authorizing the plaintiff to demolish, repair, enclose or clean up said premises, if necessary, and a judgment against defendants and a lien on the subject property for these costs in accordance with Section 5/11-31-1 (a) of Chapter 65 of the Illinois Compiled Statutes, as amended.
- d. If appropriate and under proper petition, for an order declaring the property abandoned under Section 5/11-31-1 (d) of Chapter 65 of the Illinois Compiled Statutes as amended and for an order granting City of Chicago a judicial deed to the property if declared abandoned.
- e. If a statutory lien is obtained in this proceeding under Section 5/11-31-1 or 5/11-31-2 of Chapter 65 of the Illinois Compiled Statutes, as amended, for an order permitting foreclosure of said lien in this proceeding.
- f. For reasonable attorney fees and litigation and court costs.

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g. For such other and further relief as may be necessary in the premises and which the court shall deem necessary.

CITY OF CHICAGO, a municipal corporation

By: _____

ASSISTANT CORPORATION COUNSEL

VERIFICATION

The undersigned, being first duly sworn on oath, deposes and says that he/she is the duly authorized agent of the plaintiff for the purpose of making this affidavit; that he/she has read the above and forgoing complaint, and has knowledge of the contents thereof, and that matters set out therein are true in substance and in fact, and as to matters alleged on information and belief that he/she believes them to be true.

Subscribed and sworn to before me this _____ Day
of _____ 20_____.

By: _____

Deputy Circuit Court Clerk or Notary Public

For further information Contact: Department of Buildings
Public Information Desk (312) 744 3400

Mara S. Georges
Corporation Counsel
Attorney for Plaintiff

By: _____

Assistant Corporation Counsel
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Chicago, Illinois 60602
Atty. No 90909
(312) 744-8791