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

CITY OF CHICAGO, a municipal corporation,	)	CASE NO: 10 M1 401012
Plaintiff,	)	
	)	Property Address: 1344 S. KOLIN AVE.
v.	)	CHICAGO, IL
	)	
	)	Room: 1105, Richard J. Daley Center
JONATHAN LEVI PEREIRA, et al.	)	
Defendant(s)	)	Lien Amount: \$7,454.58

**CLAIM FOR RECEIVER'S LIEN**

The claimant, City of Chicago, a municipal corporation, by the authority granted by Illinois Compiled Statutes, Chapter 65, Section 5/11-31-2, hereby files its claim for lien against the following described property

**Legal:** LOT 18 IN BLOCK 3 IN SUBDIVISION OF BLOCKS 13, 14, 15 AND 16 IN THE SUBDIVISION BY L.C.P. FREER (AS RECEIVER) OF THE WEST 1/2 OF THE NORTHEAST 1/4 OF SECTION 22, TOWNSHIP 39 NORTH, RANGE 13 EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

**Commonly Known as:** 1344 S. KOLIN AVE., CHICAGO, IL 60623

**P.I.N.:** 16-22-208-031-0000

The aforesaid lien arises out of City of Chicago vs. JONATHAN LEVI PEREIRA, et al., Case No. 10M1401012 filed in the Circuit Court of Cook County, in which a receiver was appointed for said property by Court Order dated 07/12/2011. The receiver incurred expenses approved by the Court, pursuant to an order entered 01/17/2012. Pursuant thereto, the receiver issues a certificate in the amount of \$7,454.58 and bearing interest at 9% annum for costs and fees, which was transferred and assigned to the City of Chicago.

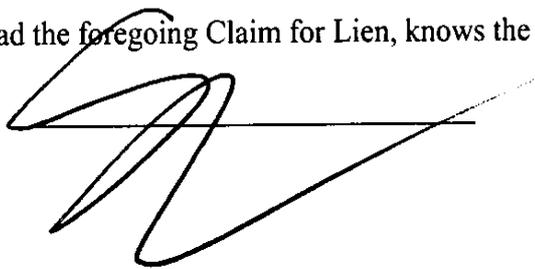
Claimant, City of Chicago, by an Assignment dated 01/20/2012, claims a lien on the above cited real estate for the amount of \$7,454.58 plus statutory interest of 9%. The City hereby reserves the right to amend this lien from time to time to include additional costs and fees. Pursuant to 35 ILCS 200/22-25 the advances made by the City to this property must be paid by tax purchaser prior to obtaining a tax deed for this property.

City of Chicago, a Municipal Corporation  
Stephen R. Patton, Corporation Counsel

Steven Q. McKenzie, Assistant Corporation Counsel, being first duly sworn on oath, deposes and says that he is

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the authorized agent for the City of Chicago, that he has read the foregoing Claim for Lien, knows the content thereof, and that all statements therein contained are true.



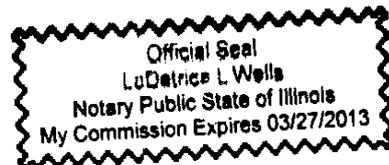
SUBSCRIBED AND SWORN TO BEFORE ME

BY Steven Q. McKenzie

This 10<sup>th</sup> day of April 2012.

LoDetrice L. Wells

Stephen R. Patton, Corporation Counsel #90909  
30 North LaSalle, Suite 700 Chicago, IL 60602 (312) 744-8791



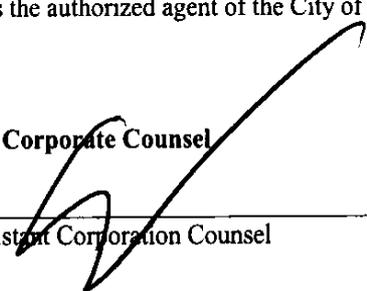
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The undersigned, an Assistant Corporation Counsel, is the authorized agent of the City of Chicago in this transaction.

**Stephen R. Patton No. 90909, Corporate Counsel**

By:   
Assistant Corporation Counsel

**David Feller, Receiver  
C/o Globetrotters  
300 S. Wacker Drive  
Suite 400  
Chicago, IL. 60606  
(312) 697-3556**

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

CITY OF CHICAGO, a municipal corporation,	)	Case No: 10 - M1 - 401012
	)	
Plaintiff,	)	Address: 1344 South Kolin
	)	
V.	)	Chicago, IL. 60623
	)	
Jonathan Levi Pereira, et al	)	
	)	Courtroom: 1107
Defendant(s).	)	Richard J. Daley Center

### ORDER FOR RECEIVER'S CERTIFICATE

This cause coming on to be heard on the receiver's petition for the court's approval of his final accounting and for authorization to issue a receiver's certificate, with due notice being given to all parties and, with the court being fully advised in the premises;

#### THE COURT FINDS:

1. That on July 12, 2011, the receiver was appointed for the purpose of vacating the building, providing tenants with up to \$500.00 in order to relocate and then boarding the building.
2. The receiver performed services as detailed in the final accounting.
3. The receiver presented a petition for fees and costs in the amount of \$7,454.58 for services provided to the court.
4. The fee and cost of \$7,454.58 is reasonable compensation for the receiver's performance of his duties and for services provided to the court.

#### IT IS ORDERED:

- A. That the receiver's petition for fees and costs is granted;
- B. That the receiver's fee and cost of \$7,454.58 is hereby approved by the court;
- C. That the receiver is hereby authorized to issue and to assign to the City of Chicago for valuable consideration a receiver's certificate in the amount of \$7,454.58. The certificate includes the expenses and fees of vacating and securing and providing relocation assistance to tenants. Interest shall accrue on unpaid amounts from the date this order is entered at (9%) per annum. The certificate is to issue against the real estate and constitute a first lien thereon in accordance with provisions of Illinois Compiled Statutes, Chapter 65, Section 5/11-31-2.

Hearing Date: January 17, 2012

Stephen R. Patton No. 90909  
Corporation Counsel  
Attorney for the Plaintiff

By: \_\_\_\_\_  
Assistant Corporation Counsel  
30-N. LaSalle Street, Suite 700  
Chicago, IL 60602  
(312) 744-8791

Entered: Judge Lauretta Higgins Wolfson

JAN 17 2012

Circuit Court 1938

Judge \_\_\_\_\_ Room 1107

*Higgins*  
*Wolfson*

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

CITY OF CHICAGO, a municipal corporation,	) Case No. <b>10M1 401012</b>
Plaintiff	) Amount claimed per day <b>4,500.00</b>
V.	) Address:
JONATHAN LEVI PEREIRA	) 1344 - 1344 S KOLIN AVE CHICAGO IL 60623-
MORTGAGE ELECTRONIC REGISTRATN	)
SYSTEMS INC AS NOMINEE FOR WILSON AND	)
ASSOCIATES	)
TCF NATIONAL BANK	)
WILSON AND ASSOCIATES MORTGAGE	)
CORPORATION	)
21ST CENTURY FINANCIAL PLANNERS	)
Unknown owners and non-record claimants	)
Defendants	)

**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:

16-22-208-031

LOT 18 IN BLOCK 3 IN THE SUBDIVISION OF BLOCKS 13, 14, 15 AND 16 IN THE SUBDIVISION BY L.C.P. FREER (AS RECEIVER) OF THE WEST 1/2 OF THE NORTHEAST 1/4 OF SECTION 22, TOWNSHIP 39 NORTH, RANGE 13 EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

Commonly known as

1344 - 1344 S KOLIN AVE CHICAGO IL 60623-

and that located thereon is a

- 3 Story(s) Building
- 3 Dwelling Units
- 0 Non-Residential Units

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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.

JONATHAN LEVI PEREIRA , OWNER

MORTGAGE ELECTRONIC REGISTRATN SYSTEMS INC AS NOMINEE FOR WILSON AND ASSOCIATES , MORTGAGE HOLDER

TCF NATIONAL BANK , MORTGAGE HOLDER

WILSON AND ASSOCIATES MORTGAGE CORPORATION , MORTGAGE HOLDER

21ST CENTURY FINANCIAL PLANNERS , LAST TAXPAYER OF RECORD

Unknown owners and non-record claimants

3. That on 11/12/2009 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 EL0010

Make main service switch accessible to all building tenants. (18-27-230.70, 18-27-230.72)

Location: SEQ #: 004

2 EL0018

Replace broken, inoperable, or painted over receptacle or switch. (18-27-200.1, 18-27-200.10(b))

1sr floor throughout defective and painted

Location: SEQ #: 009

3 EL0019

Replace defective light fixture. (18-27-410.22, 18-27-410.23, 18-27-410.24, 18-27-240.27, 18-27-410.36, 18-27-410.37, 18-27-410.38, 18-27-410.39)

1st floor exterior light missing exposed wires dangerous and hazardous

Location: SEQ #: 008

4 EL0022

Remove exposed wiring at light fixture. (18-27-410.24, 18-27-410.28)

1st floor kitchen and basement

Location: SEQ #: 005

5 EL0023

Install cover on outlet or junction box. (18-27-370.25)

basement dangerous and hazardous

Location: SEQ #: 006

6 EL0029

Remove exposed wiring. (18-27-300.4)

basement panels dangerous and hazardous

Location: SEQ #: 001

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7 EL0037

Close unused opening in electrical box or cabinet. (18-27-373.4)  
panel covers basement dangerous and hazardous

Location: SEQ #: 002

8 EL0059

Remove exposed non-metallic cable. (18-27-336.3, 18-27-336.4, 18-27-336.5)  
romex in basement

Location: SEQ #: 007

9 EL0095

Use branch circuit conductor to supply only 1 apartment or dwelling unit. (18-27-570.10,  
18-27-560.23)

Location: SEQ #: 003

\*\*\* 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  
30 N LaSalle St. 7th floor  
Chicago, Illinois 60602  
Atty. No 90909  
(312) 744-8791