



Doc#: 1220541056 Fee: \$42.00  
Eugene "Gene" Moore  
Cook County Recorder of Deeds  
Date: 07/23/2012 12:17 PM Pg: 1 of 3

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

THE CITY OF CHICAGO, a municipal corporation,  
Plaintiff,  
v.  
Northern Land Equities  
et al.,  
Defendant(s).

No: 11 MI 401601  
Re: 2935 W. 117<sup>th</sup> St.  
Courtroom 1109, Richard J. Daley Center

ORDER OF JUDGMENT AND ENFORCEMENT

This cause coming to be heard on the set call, the Court having jurisdiction over the defendant(s) and the subject matter, being fully advised in the premises, and having heard evidence and testimony.

IT IS HEREBY ORDERED THAT:

- The judgment entered on 7 / 19 / 12 in the amount of \$           .00 plus \$           .00 court costs for a total of \$ 3,500.00 against Defendant(s) Northern Land Equities, Inc. shall stand as final judgment against said Defendant(s) as to Count II of City's Complaint.
- Leave for enforcement of said judgment is granted plaintiff, City of Chicago, instantly 10/19/12.
- Any and all other counts against the above named Defendant(s) are hereby dismissed.
- Pursuant to Illinois Supreme Court Rule 304(a), this is a final and appealable order. The Court finds no just reason to delay enforcement or appeal of this judgment.

*off call*

HEARING DATE: 7 / 19 / 12

Associate Judge William G. Pileggi

JUL 19 2012

Judge

Circuit Court - 1764  
Courtroom 1109

By [Signature]  
Assistant Corporation Counsel  
Mara S. Georges, Corporation Counsel #90909  
30 N. LaSalle, Room 700  
Chicago, IL 60602 (312) 744-8791

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

THE CITY OF CHICAGO, a municipal corporation,  
Plaintiff,

11 M 401601

v.

NORTHERN LAND EQUITIES, INC.,

CENTRAL DIE CASTING &  
MANUFACTURING CO., INC.,

JP MORGAN CHASE BANK, NA, SUCCESSOR  
TO AMERICAN NATIONAL BANK & TRUST  
CO. OF CHICAGO,

FNA ELM, LLC,

UNKNOWN OWNERS, and  
NONRECORD CLAIMANTS,

Case Number:

Re: 2935 W 47TH ST.  
CHICAGO, IL 60632

Courtroom 1109

Defendants.

**PLAINTIFF CITY OF CHICAGO'S  
COMPLAINT FOR EQUITABLE AND OTHER RELIEF**

Plaintiff, THE CITY OF CHICAGO ("the City"), by and through its attorney, Stephen Patton, Corporation Counsel, and the undersigned attorney, complains of the defendants as follows:

**GENERAL ALLEGATIONS**

*Nature of the Case*

1. The City brings this action pursuant to its police power as a home rule unit under Article VII of the Illinois Constitution, which includes "the power to regulate for the protection of the public health, safety, morals and welfare." Ill. Const. art. VII, § 6(a). As a further grant of authority, the City brings this action pursuant to the Unsafe Property Statute, 65 Ill. Comp. Stat. 5/11-31-1(a) et seq. (West 2010), and the Injunction Statute for Building and Zoning Violations, 65 Ill. Comp. Stat. 5/11-13-15 (West 2010). In addition, the City brings this action under its Improperly Maintained Buildings and Structures Subject to Nuisance Abatement Proceedings ("Slum Nuisance") Ordinance, Municipal Code of Chicago § 13-12-145 (2010). By bringing this action, the City seeks to abate dangerous and unsafe conditions at the property in question and obtain equitable relief, civil penalties, attorney's fees, and costs.

*The Parties and the Property at Issue*

2. The City is a municipal corporation organized and existing under the laws of the State of Illinois.
3. Within the corporate limits of Chicago, there is a parcel of real estate legally described as:

PARCEL 1: THE EAST 133.12 FEET OF THE WEST 245 FEET OF THE NORTH  
616 FEET OF THE EAST 1244 FEET OF THE NORTH 1/2 OF THE  
NORTHWEST 1/4 OF SECTION 12, TOWNSHIP 38 NORTH, RANGE 13 EAST

# UNOFFICIAL COPY

OF THE THIRD PRINCIPAL MERIDIAN (EXCEPT THE NORTH 33 FEET THEREOF USED AND OCCUPIED AS THE SOUTH 33 FEET OF WEST 47TH STREET) ALSO (EXCEPT THE EAST 33 FEET THEREOF USED AS THE WEST 33 FEET OF SOUTH RICHMOND STREET, A PRIVATE STREET) ALSO (EXCEPT THE SOUTH 10 FEET THEREOF USED AS THE NORTH 10 FEET FOR A PRIVATE ALLEY) IN COOK COUNTY, ILLINOIS.

PARCEL 2: THE EAST 15.94 FEET OF THE WEST 111.88 FEET OF THE NORTH 616 FEET OF THE EAST 1244 FEET OF THE NORTH 1/2 OF THE NORTHWEST 1/4 OF SECTION 12, TOWNSHIP 38 NORTH, RANGE 13 EAST OF THE THIRD PRINCIPAL MERIDIAN (EXCEPT THE NORTH 33 FEET USED AND OCCUPIED AS THE SOUTH 33 FEET OF WEST 47TH STREET) ALSO (EXCEPT THE SOUTH 10 FEET THEREOF USED AS THE NORTH 10 FEET OF A PRIVATE ALLEY) IN COOK COUNTY, ILLINOIS.

This parcel is commonly known as 2935 W. 47TH ST., Chicago, Cook County, Illinois ("subject property"), and has a permanent index number of 19-12-101-016.

4. Located on the subject property is a TWO STORY BRICK building. The last known use of the building was COMMERCIAL.
5. At all times relevant to this complaint, the defendants owned, managed, controlled, collected rents from, contributed to the ongoing violations at, or had a legal or equitable interest in the subject property. More specifically:
  - a. Defendant NORTHERN LAND EQUITIES, INC. has the following interest in the subject property: RECORD OWNER.
  - b. Defendant CENTRAL DIE CASTING & MANUFACTURING CO., INC. has the following interest in the subject property: MORTGAGE HOLDER AND LAST KNOWN TAXPAYER.
  - c. Defendant JP MORGAN CHASE BANK, NA, SUCCESSOR TO AMERICAN NATIONAL BANK & TRUST CO. OF CHICAGO has the following interest in the subject property: LIEN HOLDER.
  - d. Defendant FNA ELM, LLC has the following interest in the subject property: PURCHASER OF THE DELINQUENT REAL ESTATE TAXES.
  - e. Defendants also include UNKNOWN OWNERS and NONRECORD CLAIMANTS.

### *Dangerous and Unsafe Conditions*

6. On February 26, 2011, and continuing to the present, dangerous and unsafe conditions have existed at the subject premises, including but not limited to:
  - a. The building is vacant.