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Cook County Recorder of Deeds
Date: 10/30/2012 12:07 PM Pg: 1 of 13

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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: 11 M1 402597
Plaintiff,)	
)	Property Address: 6202 S. THROOP
v.)	Chicago, IL
)	Room: 1105, Richard J. Daley Center
ARK OF SAFETY APOSTOLIC)	
FAITH TEMPLE, INC., et al.)	
Defendant(s))	Lien Amount: \$6,816.75

* CORRECT * 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 2 IN BLOCK 1 IN JOHN TEARS SUBDIVISION OF THE WEST 9 1/3 ACRES OF THE SOUTH 19 ACRES OF SOUTHEAST 1/4 OF THE SOUTHWEST 1/4 OF SECTION 17, TOWNSHIP 38 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

Commonly Known as: 6202 S. THROOP, CHICAGO, IL 60636

P.I.N.: 20-17-330-023-0000

The aforesaid lien arises out of City of Chicago vs. ARK OF SAFETY APOSTOLIC FAITH TEMPLE, INC., et al. Case No. 11 M1402597 filed in the Circuit Court of Cook County, in which a receiver was appointed for said property by Court Order dated 05/31/2012. The receiver incurred expenses approved by the Court, pursuant to an order entered 09/27/2012. Pursuant thereto, the receiver issues a certificate in the amount of \$6,816.75 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 09/27/2012, claims a lien on the above cited real estate for the amount of \$6,816.75 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

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

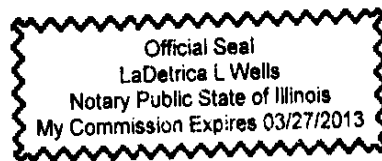
SUBSCRIBED AND SWORN TO BEFORE ME

BY Steven Q. McKenzie

This 30th day of October 2012.

LaDetrica L. Wells

STEPHEN R. PATTON, CORPORATION COUNSEL #90909
30 North LaSalle, Suite 700 Chicago, IL 60602 (312) 744-8791



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Doc#: 1229341002 Fee: \$58.00
Eugene "Gene" Moore
Cook County Recorder of Deeds
Date: 10/19/2012 09:35 AM Pg: 1 of 11

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HEAT

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

CITY OF CHICAGO, a municipal corporation,)
Plaintiff)
v.)
ARK OF SAFETY APOSTOLIC)
FAITH TEMPLE, INC., et al.)
Defendant(s))

CASE NO: 11 M1 402567 *wrong case#*
Property Address: 6202 S. THROOP
Chicago, IL
Room: 1105, Richard J. Daley Center
Lien Amount: \$6,816.75

CLAIM FOR RECEIVER'S LIEN

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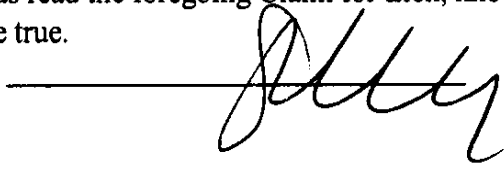
City of Chicago, a Municipal Corporation
Stephen R. Patton, Corporation Counsel

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SUBSCRIBED AND SWORN TO BEFORE ME

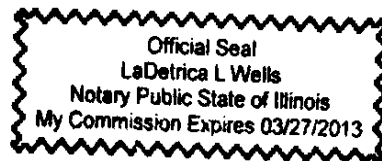
BY Steven Q. McKenzie



This 18th day of Oct 2012.

LaDetrica L Wells

STEPHEN R. PATTON, CORPORATION COUNSEL #90909
30 North LaSalle, Suite 700 Chicago, IL 60602 (312) 744-8791



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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: 11-M1-402597
)	
Plaintiff,)	Property Address:
)	6202 South Throop
v.)	<u>CHICAGO, IL.</u>
Ark of Safety Apostolic Faith Temple, Inc., et al)	Courtroom: <u>1105</u>
)	Richard J. Daley Center
Defendant (s))	

RECEIVER'S SECOND CERTIFICATE

The undersigned David Feller was reappointed heat receiver by the court to vacate the building, board, secure and make necessary repairs to the premises on May 31, 2012. For value received, the receiver in his official capacity and not individually promises to pay to bearer the sum of \$6,816.75 on or before ninety (90) days after the date this certificate, with interest accruing at the rate of nine percent (9%) per annum until this receiver's certificate is fully paid, both principal and interest payable in such banking house or trust company in the City of Chicago, Illinois, as the legal holder of this receiver's certificate may appoint in writing or in the absence of such appointment, at the office of the Building and Housing Division of the City of Chicago's Law Department.

This receiver's certificate is issued under and by virtue of an order of the Circuit Court of Cook County, Illinois, entered on September 27, 2012 in the above-entitled cause, and pursuant to Illinois Compiled Statutes, chapter 5/11-31-2. This receiver's certificate is freely transferable and shall constitute a first lien in accordance with Illinois Compiled Statutes, chapter 65, section 5/21-31-2 and the foregoing order, upon the premises legally described as follows:

SEE ATTACHED

Permanent Index Number: 20-17-330-023-0000

This receiver's certificate, together with the interest thereon, in no manner constitutes a personal obligation or liability of the receiver.

The holder of the receiver's certificate shall release the same receiver's certificate and the lien thereof by proper instrument, upon full and final payment of the underlying indebtedness evidenced by this receiver's certificate, either before or after maturity thereof. In the event the holder refuses to execute and deliver a release, the receiver may petition the court to order the holder to issue a release.

ASSIGNMENT

For the sum of one dollar (\$1.00) and for other good and valuable consideration, David Feller does hereby sell, assign and transfer to the City of Chicago, the foregoing receiver's certificate.

Dated: 9/27/12

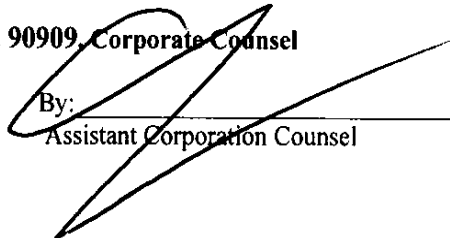


David Feller, Heat Receiver

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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**

Property of Cook County Clerk's Office

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

CITY OF CHICAGO, a municipal corporation,)	Case No: 11 - M1 - 402597
)	
Plaintiff,)	Address: 6202 South Throop
)	
V.)	Chicago, IL. 60636
)	
Ark of Safety Apostolic Faith Temple, Inc, et al))	
)	Courtroom: 1105
Defendant(s).)	Richard J. Daley Center

ORDER FOR RECEIVER'S SECOND FINAL CERTIFICATE

This cause coming on to be heard on the receiver's petition for the court's approval of his second 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:

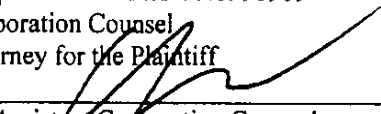
1. That on May 31, 2012, the receiver was reappointed for the purpose of vacating, boarding, securing and necessary other repairs at the premises.
2. The receiver performed services as detailed in the second final accounting.
3. The receiver presented a petition for gross fees in the amount of \$4,426.25 for services provided to the court.
4. The receiver presented a petition for gross expenses including mark up in the amount of \$2,762.00 for out of pocket costs provided to the court.
5. Fees of ~~\$4,426.25~~ are reasonable compensation for the receiver's performance of his duties and for services provided to the court 4054.75
6. Out of pocket costs including mark ups of \$2,762.00 is reasonable for out of pocket expenses provided to the court.


IT IS ORDERED:

- A. That the receiver's petition for costs and fees is granted;
- B. That the receiver's costs and fees of ~~\$7,188.25~~ are hereby approved by the court; 6816.75
- 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 ~~\$7,188.25~~. The certificate includes the cost of vacating and boarding the premises, plus all receiver's fees. 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: September 27, 2012

Entered:

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

Judge  Room 1105
 Judge Daniel B. Malone

SEP 27 2012
 Circuit Court - 2012

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IN THE CIRCUIT COURT OF COOK COUNTY MUNICIPAL DEPARTMENT – FIRST DISTRICT

CITY OF CHICAGO,
a municipal corporation

Plaintiff

v.

ARK OF SAFETY APOSTOLIC FAITH TEMPLE, INC.
TYRONE AUSTIN JR.
HERMAN JACKSON,

Unknown owners and non-record claimants,

Defendants

)
)
) Case No. 11 M1 402597
)
) Amount claimed: \$15,000.00 per day
)
) Address: 6202 S. THROOP ST.
) CHICAGO, IL 60636
)
)
) Courtroom 1105
) Richard J. Daley Center

SECOND AMENDED COMPLAINT FOR EQUITABLE AND OTHER RELIEF

Plaintiff, City of Chicago ("City"), a municipal corporation, by Stephen R. Patton, Corporation 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:
20-17-330-023-0000

LOT 2 IN BLOCK 1 IN JOHN TEARS SUBDIVISION OF THE WEST 9 1/3 ACRES OF THE SOUTH 19 ACRES OF SOUTHEAST 1/4 OF THE SOUTHWEST 1/4 OF SECTION 17, TOWNSHIP 38 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

Commonly known as
6202 S. THROOP ST., CHICAGO, IL 60636

and that located thereon is a

2	Story(s) Building
2	Dwelling Units
1	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.

ARK OF SAFETY APOSTOLIC FAITH TEMPLE, INC., OWNER
TYRONE AUSTIN JR., LAST TAXPAYER OF RECORD
HERMAN JACKSON, POSSIBLE OWNER/INTERESTED PARTY
Unknown owners and non-record claimants

FILED
JUN 8 2012
DORIS BROWN
Clerk of Circuit Court

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3A. That on **6/7/2011** and on each succeeding day thereafter and on numerous other occasions, the defendant(s) failed to comply with the Municipal Code of the City of Chicago as follows:

1 CN 104025

Failed to maintain window sash in good condition and so it fits reasonably tight within its frame. (13-196-550(b))

ALL ELEVATIONS AND FLOORS – WOOD WINDOW SASHES ROTTED WITH FLAKING PAINT AND PUTTY.

2 CN 131026

Failed to repair or replace defective screen. (13-196-560 B)

ALL ELEVATIONS AND FLOORS – WINDOW SCREENS TORN, LOOSE, AND MISSING.

3 CN 196029

Failed to post name, address, and telephone of owner, owner's agent for managing, controlling or collecting rents, and any other person managing or controlling building conspicuously where accessible or visible to public way. (13-12-030)

BUILDING – NO OWNER I.D. SIGN POSTED.

4 CN 065034

Failed to maintain window sil. in good repair and free from cracks and defects. (13-196-530(e), 13-196-550, 13-196-641)

FRONT 1ST FLOOR WINDOW SILLS – ROTTED WITH FLAKING PAINT.

5 CN 061014

Failed to maintain the exterior walls of a building or structure free from holes, breaks, loose or rotting boards or timbers and any other conditions which might admit rain or dampness to the walls. (13-196-530(b), 13-196-641)

ALL ELEVATIONS AND FLOORS – WALL SIDING ROTTED, LOOSE, MISSING, BULGED, AND DETERIORATING.

6 CN 104015

Failed to replace broken, missing or defective window panes. (13-196-550 A)

ALL ELEVATIONS – BASEMENT WINDOWS PLYWOOD BOARDUP.

7 CN 138106

Failed to remove and stop nuisance. (7-28-060)

ALL YARDS – HIGH WEEDS AND OVERGROWN SHRUBS.

8 CN 078014

Failed to provide and maintain adequate illumination of exit areas. (13-160-660, 13-160-670, 13-196-080)

LIGHTS MISSING FRONT PORCH AND BASEMENT STAIRS, AND REAR PORCH BASEMENT TO SECOND FLOOR.

9 CN 070024

Failed to repair or replace defective or missing members of porch system. (13-196-570, 13-196-641)

FRONT PORCH IRON RAILS – RUSTED OFF AT BASE AND WEAK.

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10 CN 076044

Failed to maintain roof downspouts in good repair and working condition. (13-196-590, 13-196-630(b), 13-196-641, 18-29-1101, 18-29-1105, 18-29-1106)

SOUTH DOWNSPOUT AT WEST – SMASHED AND DENTED.

11 CN 063014

Failed to maintain chimney in safe and sound working condition. (13-196-590, 13-196-530(b) and (c), 13-196-641)

SOUTH CHIMNEY SPALLED BRICKS AND LOOSE MORTAR.

12 CN 114015

Failed to provide 125 sq ft for each of first 2 occupants, 100 sq ft for each of next 2 occupants, and 75 sq ft for each additional occupant of family unit. (13-196-480)

TWO STORY FRAME TWO APARTMENT BUILDING HAS BEEN ALTERED INTO ROOMING AND BOARDING HOUSE. SEVERE OVERCROWDING OF SECOND FLOOR APARTMENT WHICH HAS NOW TWELVE MATTRESSES AND BELONGINGS OF OCCUPANTS ON FLOORS OF ALL ROOMS. MATTRESSES ON FLOORS ARE BLOCKING EXIT PATHS. OVERCROWDING IS CAUSING A DANGEROUS AND HAZARDOUS CONDITION TO OCCUPANTS.

13 CN 101015

Failed to maintain interior walls and ceilings free from holes or cracks. (13-19-540(c))

FIRST FLOOR APARTMENT – CEILING FLAKING PAINT AND PLASTER.

14 CN 070024

Failed to repair or replace defective or missing members of porch system. (13-196-570, 13-196-641)

REAR WOOD PORCH – FIRE DAMAGED DECKING AT FIRST FLOOR LANDING.

15 CN 190019

Arrange for inspection of premises. (13-12-100)

BASEMENT INTERIOR – NO ENTRY, UNVERIFIED DETECTORS, CONDITIONS, AND OCCUPANCY.

16 CN 197019

Failed to 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.

SECOND FLOOR FRONT INTERIOR STAIRS – MISSING SMOKE DETECTOR.

17 CN 197079

Repair or replace defective or out of service smoke detectors and operate continuously. (13-196-130, 13-196-140)

FIRST FLOOR HALLWAY – SMOKE DETECTORS MISSING FROM MOUNTING BRACKETS.

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18 CN 165017

Failed to replace defective bathroom floor with non-absorbent, water impervious, and easily cleanable material. (13-196-540 F)

FIRST FLOOR KITCHEN AND BATHROOM – MISSING LOOSE FLOOR TILES.

19 PL 159027

Failed to reset loose plumbing fixture. (18-29-102.3)

FIRST FLOOR LAVATORY SINK – PULLED OUT FROM WALL, LOOSE.

3B. That on **11/8/2011** and on each succeeding day thereafter and on numerous other occasions, the defendant(s) failed to comply with the Municipal Code of the City of Chicago as follows:

20 CN 104075

Failed to maintain windows in relation to the adjacent wall construction as to completely exclude rain and substantially exclude wind from entering the premises. (13-196-550(f))

BUILDING ALL ELEVATION WINDOWS AIR-SEEPAGE. (FRAMES ROTTED)

21 CN 132046

Failed to provide and maintain every facility, piece of equipment, or utility in safe and sound working condition. (13-196-410, 13-196-440)

SECOND FLOOR HEATING UNIT HAS BEEN REMOVED. NO HVAC PLANS, APPLICATIONS FOR PERMITS, OR PERMITS ARE ON FILE FOR THIS PROPERTY FOR REMOVAL OF HEATING UNIT. ON INFORMATION AND BELIEF, FURNACE SUPPLIED HEAT TO ENTIRE PROPERTY.

22 CN 197019

Failed to 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 IN BUILDING.

23 CN 197087

Failed to 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 CARBON MONOXIDE DETECTORS IN BUILDING.

24 CN 132016

Failed to heat dwelling unit adequately from September 15th to June 1st. (13-196-410)

SECOND FLOOR, NO HEAT AT 63 DEGREES. ON INFORMATION AND BELIEF, FURNACE REMOVED FROM SECOND FLOOR SUPPLIED HEAT TO BUILDING AND ENTIRE BUILDING IS CURRENTLY WITHOUT HEAT.

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25 PL 154027

Failed to supply adequate hot water with minimum temperature of 120 degrees F. (13-196-430)
SECOND FLOOR BATHROOM SINK AND TUB – NO HOT WATER.

- 3C. That on 12/5/2011 and on each succeeding day thereafter and on numerous other occasions, the defendant(s) failed to comply with the Municipal Code of the City of Chicago as follows:

26. ELOOOI

Replace defective lighting service. (18-27-230.2)
SERVICE CUT AT POLE

27. EL0003

Replace defective meter socket. (18-27-230.62,66)
ALL METERS REMOVED

28. EL0010

Make main service switch accessible to all building tenants. (18-27-230.70, 72)

29. EL0080

Patch and seal around conduit passing through exterior wall. (18-27-110.12)

30. EL0084

Provide all required smoke and carbon monoxide detectors. (18-27-570.10)

*** End of Violations ***

4. That Michael Merchant is the Commissioner of the Department of Buildings of City of Chicago, and as such and pursuant to the Building Codes of the City of Chicago, caused inspections(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 13-20-020 of the Municipal Code of Chicago, in the amount indicated on the hearing 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, re-alleges 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 afore stated 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 reviewer be appointed, to bring the subject property into compliance with the Municipal Code.
7. That Michael Merchant, 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:

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WHEREFORE, PLAINTIFF PRAYS:

- a. For the 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 f the Municipal Code.
- b. For the appointment of a 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 the 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.
- 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

STEPHEN R. PATTON
Corporation Counsel of the City of Chicago
Attorney for Plaintiff
By: STEVEN QUAINANCE MCKENZIE
Assistant Corporation Counsel
Building and License Enforcement Division
30 North La Salle Street, Suite 700, Chicago, Illinois 60602
Atty. No 90909
(312) 744-8791

VERIFICATION

The undersigned, being 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.


ASSISTANT CORPORATION COUNSEL