



Doc#: 1327341133 Fee: \$60.00
Karen A. Yarbrough
Cook County Recorder of Deeds
Date: 09/30/2013 12:32 PM Pg: 1 of 12

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

CITY OF CHICAGO, a municipal corporation,)	CASE NO: 11 M1 401198
Plaintiff,)	
)	Property Address: 324 N. LOTUS
v.)	CHICAGO, IL
)	Room: 1105, Richard J. Daley Center
IJE AND ASSOCIATES INC., et al.)	
)	
Defendant(s))	Lien Amount: \$ 3,023.02

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: THE NORTH 46 1/2 FEET OF THE SOUTH 95 FEET OF THE NORTH 295 FEET OF THE EAST 1/2 OF BLOCK 2 (EXCEPT THE WEST 10 FEET OF THE NORTH FEET THEREOF) OF FRINK'S RE-SUBDIVISION OF THE NORTH 36 1/4 ACRES OF THE EAST 1/2 OF THE SOUTHEAST 1/4 OF SECTION 9, AND OF THE NORTH 36 1/4 ACRES OF THE WEST 1/2 OF THE SOUTHWEST 1/4 OF SECTION 9, TOWNSHIP 39 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, BEING A RE-SUBDIVISION OF LOTS 1, 2, 3, 4, 5, 6, 7 AND 8 OF SUPERIOR COURT PARTITION OF THE ABOVE DESCRIBED LAND AND KNOWN AS FRINK'S SUBDIVISION, IN COOK COUNTY ILLINOIS.

Commonly Known as: 324 N. LOTUS, CHICAGO, IL 60644

P.I.N.: 16-09-301-022-0000 AND 16-09-301-023-0000

The aforesaid lien arises out of City of Chicago vs. IJE AND ASSOCIATES, INC., et al., Case No. 11M1401198 filed in the Circuit Court of Cook County, in which a receiver was appointed for said property by Court Order dated 07/25/2011. The receiver incurred expenses approved by the Court,

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pursuant to an order entered 09/17/2013. Pursuant thereto, the receiver issues a certificate in the amount of \$3,023.02 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 09/18/2013 claims a lien on the above cited real estate for the amount of \$3,023.02 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 200/22-35 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 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.

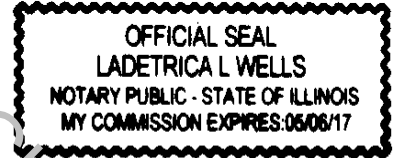
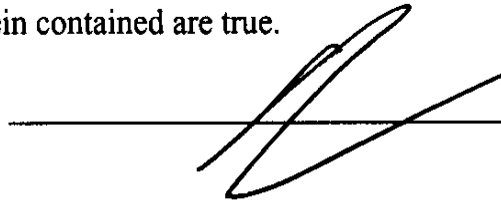
SUBSCRIBED AND SWORN TO BEFORE ME

BY Steven Q. McKenzie

This 27 day of Sept 2013

LaDetricia 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-M1-401198
)	
Plaintiff,)	Property Address:
v.)	324 North Lotus
IJE and Associates Inc. , et al)	<u>CHICAGO, IL.</u>
)	Courtroom: <u>1107</u>
Defendant (s))	Richard J. Daley Center

RECEIVER'S FIRST CERTIFICATE

The undersigned Globetrotters Engineering Corporation was appointed heat receiver by the court to provide relocation assistance up to \$1,200.00 at the above premises on July 25, 2011. For value received, the receiver in his official capacity and not individually promises to pay to bearer the sum of \$3,023.02 on or before ninety (90) days after the date this certificate, with interest accruing at the rate of ten percent (10%) 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 17, 2013 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: 16-09-301-022 and 023

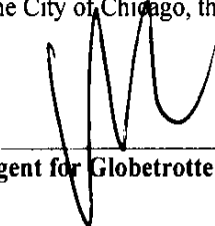
This receiver's certificate, together with the interest thereon, in no manner constitutes a personal obligation or liability of the receiver.

The holder of the receiver's certificate shall release the same receiver's certificate and the mon 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.

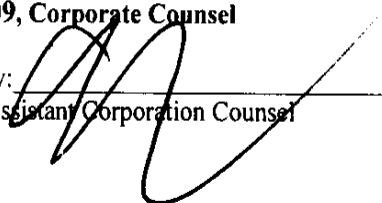
Dated: _____

9/18/13 
David Feller, Agent for Globetrotters Engineering Corporation

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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: 11 - M1 - 401198
)	
Plaintiff,)	Address: 324 North Lotus
)	
V.)	Chicago, IL. 60644
)	
IJE and Associates Inc., et al)	
)	Courtroom: 1107
Defendant(s).)	Richard J. Daley Center

ORDER FOR RECEIVER'S FIRST CERTIFICATE

This cause coming to be heard on the Receiver's Motion for Approval of Accounting and for authorization to issue Receiver's certificate, with due notice being given to all parties and the Court being fully advised in the premises;

THE COURT FINDS:

1. That on July 25, 2011, the limited receiver was appointed for the purpose of vacating the above premises.
2. The fees of \$2,005.57 are reasonable compensation for the Receivers performance of duties to the court from **July 25, 2011 through and including December 5, 2011.**
3. The costs of \$1,260.00 were reasonably incurred by the Receivers' contractor(s).

IT IS ORDERED:

- A. That the Receiver's Accounting petition for fees and costs of \$3,265.57 is hereby approved by the court;
- B. 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 \$3,265.57. The certificate includes the fees and costs of the receivership. Interest shall accrue on unpaid amounts from the date this order is entered at **(10%) 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 17, 2013 **Entered:**

Stephen R. Patton No. 90909

Corporation Counsel
Attorney for the Plaintiff

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

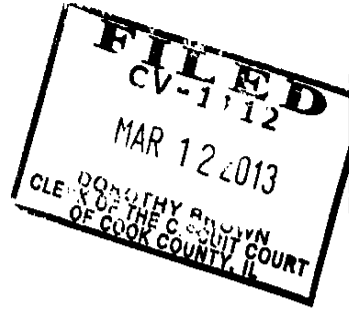
[Signature]
Judge _____, Room 1107

Higgins Watson

Judge Laura Higgins Watson
SEP 17 2013
Circuit Court 1938

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



THE CITY OF CHICAGO, A MUNICIPAL CORPORATION,

CASE NO. : 11 M1 401198

PLAINTIFF

RE: 324 N. LOTUS AVE.

v.

AMOUNT REQUESTED:
\$18,500.00 PER DAY OF VIOLATION

IJE AND ASSOCIATES, INC.,
MARIAM SAGIR,
AGWU MONG,
UNKNOWN OWNERS AND NONRECORD CLAIMANTS

COURTROOM 1107, DALEY CENTER

DEFENDANT(S)

SECOND AMENDED COMPLAINT FOR EQUITABLE AND OTHER RELIEF

Plaintiff, City of Chicago, a municipal corporation, by Mara S. Georges, Corporation Counsel, states as follows:

COUNT I

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

THE NORTH 46½ FEET OF THE SOUTH 95 FEET OF THE NORTH 295 FEET OF THE EAST ½ OF BLOCK 2 (EXCEPT THE WEST 10 FEET OF THE NORTH 45 FEET THEREOF) OF FRINK'S RESUBDIVISION OF THE NORTH 36¾ ACRES OF THE EAST ½ OF THE SOUTHEAST ¼ OF SECTION 9, AND OF THE NORTH 36¾ ACRES OF THE WEST ½ OF THE SOUTHWEST ¼ OF SECTION 9, TOWNSHIP 39 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, BEING A RESUBDIVISION OF LOTS 1, 2, 3, 4, 5, 6 7, AND 8 OF SUPERIOR COURT PARTITION OF THE ABOVE DESCRIBED LAND AND KNOWN AS FRINK'S SUBDIVISION, IN COOK COUNTY ILLINOIS.

PINs: 16-09-301-022
commonly known as 324 N. LOTUS AVE., CHICAGO, IL 60644

and that located thereon is a:

- 2 story building
- 2 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:

IJE AND ASSOCIATES, INC.
MARIAM SAGIR,
AGWU MONG,
UNKNOWN OWNERS AND NONRECORD CLAIMANTS

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3a. That on 04/07/2011, 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 EL0029
Failure to remove exposed wiring in violation of §18-27-300.4 of the Code.
2ND FLOOR BATHROOM CLOSET FURNACE DANGEROUS AND HAZARDOUS
- 2 EL0001
Failure to replace defective lighting service in violation of §18-27-230.2 of the Code. 200 AMP SERVICE
DANGEROUS AND HAZARDOUS
- 3 EL0020
Failure to support loose light fixture in violation of §18-27-410.15 of the Code.
2ND FLOOR
- 4 EL0023
Failure to install cover on outlet or junction box in violation of §18-27-370.25 of the Code.
FRONT AND REAR EXTERIOR 2ND FLOOR STAIRS DANGEROUS AND HAZARDOUS
- 5 EL0011
Failure to install additional branch circuits in violation of §18-27-210.11 of the Code.
PERMIT
- 6 EL0095
Failure to use branch circuit conductor to supply only 1 apartment or dwelling unit in violation of §18-27-570.10, 18.27-560.23 of the Code.
PUBLIC METER

3b. That on 09/07/2012, 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:

- 7 EL0002
Failure to replace defective power service in violation of §18-27-230.2 of the Code.
REPLACE DEFECTIVE AND IMPROPERLY INSTALLED ELECTRICAL SERVICE. EMT CONDUIT USED FOR RISER AND SUBFEEDS FROM METER TO SERVICE DISCONNECTS (18-27-230.50). DISCONNECTS AND PANEL NOT BONDED AND GROUNDED PROPERLY (18-27-250.50, 18-27-250.92)
- 8 EL0017
Failure to provide ground continuity for electrical cable, raceway, and enclosure in violation of §18-27-300.10, 18-27-300.13 of the Code.
PROVIDE GROUND CONTINUITY FOR CONDUITS CONNECTED TO METER BANK, DISCONNECTS AND PANEL. CONDUITS ARE NOT FULLY CONNECTED, ALSO FOR ½" GREENFIELD CONNECTED TO FURNACE IN BASEMENT—NO CONNECTION
- 9 EL0084
ELECTRICAL EQUIPMENT, CONDUIT AND BOXES ARE NOT INSTALLED IN A NEAT AND WORKMANLIKE MANNER THROUGHOUT BASEMENT AREAS (18-27-110.12)
- 10 EL0033
Failure to strap and secure raceway and armored cable in violation of §18-27-110.12 of the Code.
LOOSE AND IMPROPERLY SUPPORTED CONDUITS THROUGHOUT BASEMENT
- 11 EL0029
Failure to remove exposed wiring in violation of §18-27-300.4 of the Code.
EXPOSED WIRES AT OPEN JUNCTION BOXES AND AT END OF CONDUIT IN BASEMENT AREAS

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- 12 EL0023
Failure to install cover on outlet or junction box in violation of §18-27-370.25 of the Code.
MISSING DEVICE (RECEPTACLES AND SWITCHES) COVERS WITHIN 1ST FLOOR APARTMENT
- 13 EL0084
PROVIDE GFCI PROTECTION FOR ALL KITCHEN COUNTERTOP AND BATHROOM RECEPTACLES (18-27-570.8)
- 14 EL0046
Failure to provide insight disconnect switch for motor driven appliance over 1/8th horse power in violation of §18-27-422.30, 18-27-422.35 of the Code.
PROVIDE DISCONNECT SWITCH FOR ELECTRICAL WATER HEATERS
- 15 EL0019
Failure to replace defective light fixture in violation of §18-27-410.22 of the Code.
INSTALL COVERS OR GLOBES ON LIGHT FIXTURES WHERE MISSING THROUGHOUT HOUSE
- 16 EL0084
PROVIDE ROUGH INSPECTION OF 1ST AND 2ND FLOORS. ALL NEW ELECTRICAL WORK INSTALLED WITHOUT PERMIT (13-12-360, 13-12-380)
- 17 EL0084
OBTAIN PERMIT AND LICENSED ELECTRICAL CONTRACTOR TO CORRECT ALL ELECTRICAL VIOLATIONS (13-12-360)
- 18 158017
Failure to ventilate plumbing system to prevent trap siphonage and back pressure in violation of §18-29-901 of the Code.
VENTILATE PLUMBING SYSTEM TO PREVENT TRAP SIPHONAGE AND BACK PRESSURE (18-29-901). PROVIDE VENTS FOR ALL PLUMBING FIXTURES.
- 19 159027
Failure to reset loose plumbing fixture in violation of §18-29-102.3 of the Code.
RESET LOOSE PLUMBING FIXTURE (18-29-102.3) 2ND FLOOR TOILET LOOSE
- 20 153017
Failure to repair or replace defective faucet in violation of §18-29-102.3, 18-29-424, 18-29-420.1 of the Code.
REPAIR/REPLACE DEFECTIVE FAUCET (18-29-102.3) 2ND FLOOR TUB VALVES MISSING HANDLES
- 21 236020
Failure to install plumbing fixtures and equipment properly in violation of §18-29-301.3 of the Code.
INSTALL PLUMBING FIXTURES AND EQUIPMENT PROPERLY (18-29-301.3) 1ST FLOOR TUB VALVE INSTALLED OUTSIDE WALL. PROVIDE SHUT-OFFS, DRIP PANS, FLOOR DRAINS AND REMOVE ALL FLEX HOSES SERVING WATER HEATERS. PROPERLY INSTALL WASHING MACHINE.
- 22 237026
Failure to provide water supply pipe with air chambers in violation of §18-29-604.11, 18-29-604.11.1 of the Code.
PROVIDE WATER SUPPLY PIPE WITH AIR CHAMBERS (18-29-604.11, 18-29-604.1.1) INSTALL AIR CHAMBERS ON ALL PLUMBING FIXTURES PIPING.
- 23 231010
Failure to expose plumbing system for inspection and approval in violation of §18-29-312.1 through 312.8 of the Code.
EXPOSE PLUMBING SYSTEM FOR INSPECTION AND APPROVAL (18-29-312.1 THRU -312.8)
OPEN ALL PLUMBING WALLS FOR INSPECTION-ALL FLOORS
- 24 070014
Failure to repair or replace defective or missing members of exterior stair system in violation of §13-196-

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570 of the Code.

NORTH EXTERIOR STAIRWAY GRADE TO 2ND FLOOR-LANDING AT 2ND FLOOR IS SUPPORTED BY UNDERSIZED COLUMNS OF 4X4 DIMENSION LUMBER-STRINGERS ARE CRACKED AND ROTTED WITH NO CENTER SUPPORT UNDER STRINGERS-2ND FLOOR LANDING HAS 2X6 JOIST WITHOUT PROPER HARDWARE. JOIST HANGERS SUPPORTED WITH ONLY NAILS. TREADS AND RISERS ARE ALL LOOSE, CRACKED, AND ROTTED. ALL ENCLOSED PORTIONS OF 2ND FLOOR LANDINGS AND STAIRWAYS ARE POORLY MAINTAINED AND WITH LOOSE AND TORN SHEETING. EXPOSED NAILS AND SCREWS ON THE INSIDE PORTION. SYSTEM IS DANGEROUS AND HAZARDOUS AND RECOMMEND TO BE REPLACED AND UNTIL THEN NOT TO BE USED, PLANS AND PERMITS REQUIRED.

EAST AND WEST EXTERIOR STAIRS, GRADE TO 1ST, HAVE LOOSE AND WORN TREADS-EAST SYSTEM HAS DAMAGE AND ROTTED MEMBERS ON SOUTH GUARDRAIL-BOTH HAVE LOOSE AND ROTTED DECK BOARDS AT 1ST FLOOR LANDINGS. PERMIT REQUIRED FOR REPAIRS.

25 002021

Failure to obtain permit before performing work, in violation of §13-32-010 of the Code.
WEST 6' WOODEN FENCE WAS INSTALLED WITHOUT PERMIT

26 138105

Failure to provide for regular removal of garbage and refuse from premises in violation of §7-28-240 of the Code.

REAR YARD-JUNK AND DEBRIS, HIGH WEEDS, RAT HARBORAGE

27 002011

Failure to submit plans prepared, signed, and sealed by a licensed architect or registered structural engineer for approval and obtain permit in violation of §§13-32-010, 13-32-040, 13-40-010, 13-40-020 of the Code.

INTERIOR OF BUILDING-BASEMENT-1ST AND 2ND FLOOR, SUBSTANTIAL AMOUNT OF WORK DONE WITHOUT PLANS OR PERMITS. POOR WORKMANSHIP IN THE INTERIOR OF PROPERTY-ELECTRICAL, PLUMBING AND PARTICION WALLS HAVE IN ALTERED AT ALL LEVELS

28 197019

Failure to install and maintain approved smoke detectors in violation of §13-196-100 thru 13-196-160 of the Code.

BASEMENT, 1ST FLOOR AND 2ND FLOOR UNITS ARE WITHOUT SMOKE ALARMS

29 197087

Failure to install carbon monoxide detector within 40 feet of every sleeping room in residential structure in violation of §13-64-190, 13-64-210 of the Code.

BASEMENT, 1ST FLOOR AND 2ND FLOOR UNITS ARE WITHOUT CARBON MONOXIDE DETECTORS

30 196029

Failure 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 in violation of §13-12-030 of the Code.

POST OWNER AT FRONT OF PROPERTY

31 106015

Failure to repair or replace defective or missing members of interior stair system in violation of §13-196-570 of the Code.

INTERIOR STAIRWAY-BASEMENT TO 1ST FLOOR-STRINGERS, TREADS, AND SUPPORT COLUMNS ARE LOOSE, ROTTED, AND HAVE MISSING MEMBERS-DANGEROUS AND HAZARDOUS

32 102015

Failure to place wall and ceiling surfaces in clean, smooth and tight condition in violation of §13-196-540 (d), (e) of the Code.

BASEMENT PERIMETER WALLS AND THROUGHOUT INTERIOR WALLS HAVE WATER DAMAGE AND BLACK SPORE GROWTH-DANGEROUS AND HAZARDOUS

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33 103015

Failure to repair or rebuild defective floor in violation of §13-196-540 (a), (b) of the Code.
BASEMENT FLOOR--VISIBLE FROM BASEMENT AREA--JOISTS HAVE BEEN CUT AND HAVE PENETRATIONS OF PLUMBING AND ELECTRICAL PIPES WHICH CAN WEAKEN THE FLOOR STRUCTURE.. DANGEROUS AND HAZARDOUS.

34 061014

Failure to repair exterior wall in violation of §13-196-010, 13-196-530 (b) of the Code.
REAR WEST EXTERIOR DOOR--FLASHING AT ALL AREAS OF TWO EXTERIOR DOORS ARE EXTENDING 6 INCHES AWAY FROM BUILDING AND COULD CAUSE A DANGER TO TENANTS. POORLY INSTALLED AND RECOMMEND TO BE REMOVED.

3c. Furthermore, that on 3/8/2013, 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:

35 070044

Failure to rebuild or replace porch at least 6 inches from interior lot line in violation of §15-8-320, 13-200-260 of the Code.
SECOND FLOOR SECONDARY EGRESS ON NORTH ELEVATION OF PROPERTY, BUILT ONTO PROPERTY LINE.

36 070024

Failure to repair or replace defective or missing members of porch system in violation of §13-196-570 of the Code.
FRONT AND REAR PORCH STRUCTURE ROTTED AND BUCKLING TONGUE AND GROOVE DECKING, TREADS LOOSE, HANDRAILS ROTTED AND DETACHED. GUARD RAILS UNDERSIZED 36 INCH IN HEIGHT ONLY. PLANS AND PERMITS REQUIRED FOR REPAIRS.

37 106015

Failure to repair or replace defective or missing members of interior stair system in violation of §13-196-570 of the Code.
INTERIOR STAIR SERVING SECOND FLOOR FRONT EGRESS, STAIRWAY WIDTH ONLY 30 INCHES, WINDERS AT TOP OF STAIRS MODIFIED TO PROVIDE WEST AND EAST ENTRY TO APARTMENT. PLANS AND PERMITS REQUIRED.

****End of violations****

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4. That Michael R. Merchant 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, and that Bechar Choucair is the Commissioner of the City of Chicago's Department of Public Health, and through reports of environmental lead inspectors of that Department, he or the undersigned knows 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:

a. 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 Michael R. Merchant, the Commissioner for 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 65 ILCS 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 receiver's certificates in accordance with 65 ILCS 5/11-13-2, 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 65 ILCS 5/11-31-1(a), as amended.

d. If appropriate and under proper petition, for an order declaring the property abandoned under 65 ILCS 5/11-31-1 (d) 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 65 ILCS 5/11-31-1 or 5/11-31-2, 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.

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CITY OF CHICAGO, a Municipal Corporation

by: 
ASSISTANT CORPORATION COUNSEL

For further information contact:

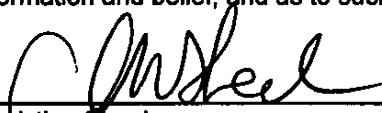
Department of Buildings
Public Information Desk
(312) 744-3400

Stephen Patton
Corporation Counsel
30 N LaSalle St. 7th floor
Chicago, Illinois 60602
Atty. No 90909
(312) 744-8791

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VERIFICATION BY CERTIFICATION

Pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that she is an Assistant Corporation Counsel of the City of Chicago, and that she is the authorized agent of the Plaintiff for purpose of making this certification, and that the statements set forth in this pleading are true and correct, except as to matters stated to be on information and belief, and as to such matters she believes the same are true.

By: 
Christine Sheehan
Assistant Corporation Counsel