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Karen A. Yarbrough  
Cook County Recorder of Deeds  
Date: 11/25/2013 02:39 PM Pg: 1 of 27

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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. )  
LEONA FARRELL, et al. )  
Defendant(s) )

CASE NO: 11 M1 400617  
Property Address: 8020 S. EMERALD AVE  
CHICAGO, IL  
Room: 1105, Richard J. Daley Center  
Lien Amount: \$ 7,655.50

**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 SOUTH 15 FEET OF 8 INCHES OF THE NORTH 89 FEET OF THE WEST 133 FEET OF LOT 2 IN BARNHART'S SUBDIVISION OF 131.01 FEET LYING SOUTH OF AND ADJOINING THE NORTH 12 CHAINS 30 LINKS OF THE NORTHWEST 1/4 OF SECTION 33, TOWNSHIP 38 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, LYING WEST OF CHICAGO, ROCK ISLAND AND PACIFIC RAILROAD, IN COOK COUNTY, ILLINOIS.

**Commonly Known as:** 8020 S. EMERALD AVE., CHICAGO, IL

**P.I.N.:** 20-33-108-042-0000

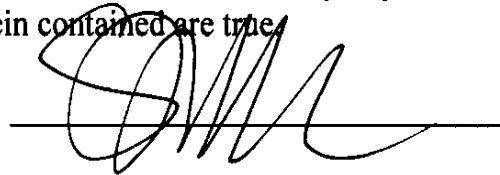
The aforesaid lien arises out of City of Chicago vs. LEONA FARRELL, et al. Case No. 11M1400617 filed in the Circuit Court of Cook County, in which a receiver was appointed for said property by Court Order dated 05/23/2013. The receiver incurred expenses approved by the Court, pursuant to an order entered 10/24/2013. Pursuant thereto, the receiver issues a certificate in the amount of \$7,655.50 and bearing interest at 10% annum for costs and fees, which was transferred and assigned to the City of Chicago.

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Claimant, City of Chicago, by an Assignment dated 10/24/2013 claims a lien on the above cited real estate for the amount of \$7,655.50 plus statutory interest of 10%. 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.



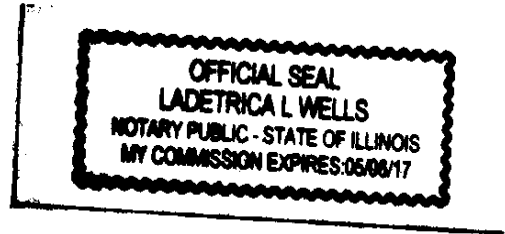
SUBSCRIBED AND SWORN TO BEFORE ME

BY Steven Q. McKenzie

This 20 day of November 2013

LaDetrica L. Wells

STEPHEN R. PATTON, CORPORATION COUNSEL #00909  
30 North LaSalle, Suite 700 Chicago, IL 60602 (312) 744-8791



Property of Cook County Clerk's Office

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

CITY OF CHICAGO, a municipal corporation,	)	Case No: 11-M1-400617
	)	
Plaintiff,	)	Property Address:
v.	)	8020 South Emerald
Leona Farrell, et al	)	<u>CHICAGO, IL.</u>
	)	
Defendant (s)	)	Courtroom: <u>1111</u> Richard J. Daley Center

**RECEIVER'S CERTIFICATE**

The undersigned Globetrotters Engineering Corporation was appointed receiver by the court on May 23, 2013 and ordered to abate bed bug and electrical hazards at the above property. For value received, the receiver in his official capacity and not individually promises to pay to bearer the sum of \$7,655.50 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 October 24, 2013 in the above-captioned 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:

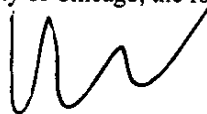
This receiver's certificate, together with the interest thereon, in no manner constitute a personal obligation or liability of the receiver.

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: 10/24/13

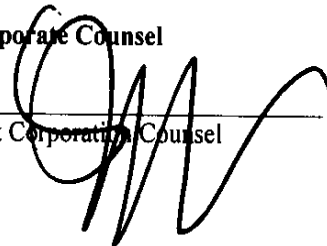
  
\_\_\_\_\_  
David Feller, Agent for Globetrotters Engineering Corporation

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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 – 400617
	)	
Plaintiff,	)	Address: 8020 South Emerald
	)	
V.	)	Chicago, IL.
	)	
Leona Farrell, et al	)	
	)	Courtroom: 1111
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:

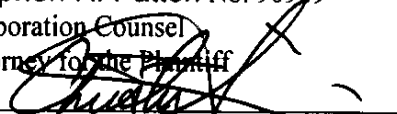
1. That on May 23, 2013, the receiver was appointed for the purpose of abating bed bug issues and electrical hazards at the above property.
2. The receiver performed services as detailed in the final accounting.
3. The receiver presented a petition for gross fees in the amount of \$4,955.50 for services provided to the court.
4. The receiver presented a petition for gross expenses in the amount of \$2,700.00 for out of pocket costs provided to the court.
5. Fees of \$4,955.50 are reasonable compensation for the receiver's performance of his duties and for services provided to the court.
6. Out of pocket costs of \$2,700.00 is reasonable for out of pocket costs provided to the court.

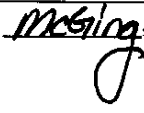
#### IT IS ORDERED:

- A. That the receiver's petition for costs and fees is granted;
- B. That the receiver's costs and fees of \$7,655.50 are 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 \$7,655.50. The certificate includes the fees and costs of the receivership, less rents received. 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: October 24, 2013

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

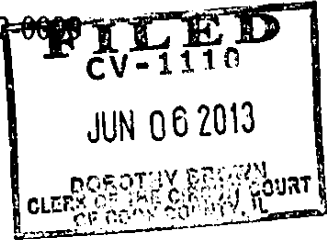
Judge James M. McGing  
 OCT 24 2013  
 Circuit Court  
 Judge , Room 11926

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

CITY OF CHICAGO,	)	No: 11 M1 400617
a municipal corporation,	)	
Plaintiff,	)	Re: 8020 S. Emerald
v.	)	Chicago, IL
	)	
LEONA FARRELL, COUNTRYWIDE	)	PIN: 20-33-108-042-0000
HOME LOANS, INC., UNKNOWN	)	
OWNERS and NON-RECORD	)	
CLAIMANTS,	)	
Defendants.	)	



### FOURTH AMENDED COMPLAINT

Plaintiff City of Chicago (“City”), by its attorney, Corporation Counsel Stephen R. Patton, complains of 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, par. 6(a). As a further grant of authority, the City brings this action pursuant to the Unsafe Property Statute, 65 ILCS 5/11-31-1(a) et seq. (2004), as amended, the Injunction Statute for Building and Zoning Violations, 65 ILCS 5/11-13-15 (2005) and Chicago Municipal Code (“Code”). By bringing this action, the City seeks to abate the 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. There is a property commonly known as **8020 S. EMERALD**, Chicago, Illinois (“Subject Property”), with a property index number **20-33-108-042-0000** and a legal description as follows:

THE SOUTH 15 FEET OF 8 INCHES OF THE NORTH 89 FEET OF THE WEST 133 FEET OF LOT 2 IN BARNHARTS SUBDIVISION OF 131.01 FEET LYING SOUTH OF AND ADJOINING THE NORTH 12 CHAINS 30 LINKS OF THE NORTHWEST 1/4 OF SECTION 33, TOWNSHIP 38

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NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN,  
LYING WEST OF CHICAGO, ROCK ISLAND AND PACIFIC  
RAILROAD, IN COOK COUNTY, ILLINOIS.

4. Located on the Subject Property is a two-story, single family, frame townhouse.
5. At all times relevant to this complaint, the Defendants owned, managed, controlled, collected rents from, contributed to the ongoing violations at, and/or had a legal or equitable interest in the Subject Property. More specifically:
  - A. Defendant **LEONA FARRELL** has an ownership interest in the Subject Property;
  - C. Defendant **COUNTRYWIDE HOME LOANS, INC.** has a mortgagee interest in the Subject Property;
  - D. All remaining defendants are unknown owners and non-record claimants of the Subject Property.

## COUNT I

### CRIMINAL ACTIVITY- CIVIL PENALTIES

6. The City re-alleges paragraphs 1-5 of the General Allegations, above, and reincorporates those allegations herein as paragraph 6 of Count I and further alleges:
7. The City brings this action pursuant to the **Drug and Gang Houses, Houses of Prostitution and Other Disorderly Houses Ordinance**, Section 8-4-090 of the Code.
8. Section 8-4-090 of the Code provides that any premises used for prostitution, illegal gambling, illegal possession or delivery of or trafficking in controlled substances, or any other activity that constitutes a felony, misdemeanor, business offense or petty offense under federal, state or municipal law is declared to be a public nuisance, provided that the property is used for more than one such offense within any six month period, or the offense is punishable by imprisonment for one year or more.
9. Section 8-4-090 further provides for any person who owns, manages, or controls such premises and who encourages or permits illegal activity to occur or continue shall be subject to a fine. This fine shall not be less than \$3,000 and not more than \$6,000 for any offense defined as a class X felony by the Criminal Code of 1961, 720 ILCS 5 ("Criminal Code"); not less than \$1,500 and not more than \$3,000 for any offense defined as a Class 1 felony by the Criminal Code; not less than \$700 and not more than \$1,400 for any offense defined as a Class 2 felony by the Criminal Code; not less than \$500 and not more than \$1,000 for any offense defined as a Class 3 felony by the Criminal Code; not less than \$300 and not more than \$1,000 for any offense defined as a Class 4 felony by the Criminal Code; and not less than \$200 and not more than \$1,000 for all offenses not otherwise specified. Each day that a

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violation of this section continues is a separate and distinct offense.

10. During the time that Defendant Leona Farrell owned and/or controlled the Subject Property, they encouraged or permitted criminal activity on or about the Subject Property.
11. According to reports created and maintained by the Chicago Police Department, the following activity constituting a felony, misdemeanor, business offense or petty offense under federal, state or municipal law, occurred at the Subject Property. Specifically:
  - A. On or about August 5, 2011, resident KENNETH BUTLER committed the criminal offense of manufacturing and or delivering of a controlled substance, more than 1 gram but less than 15 grams of heroin, (720 ILCS 570/401(c)(1), a Class 1 Felony) at the Subject Property. During the execution of a search warrant at the Subject Property, police observed BUTLER drop one (1) clear plastic bag containing fifty-four (54) yellow tinted zip lock bags of heroin to the ground from his right hand.
  - B. On or about August 5, 2011, resident KENNETH BUTLER committed the criminal offense of manufacturing and or delivering of a controlled substance, more than 1 gram but less than 15 grams of cocaine, (720 ILCS 570/401(c)(2), a Class 1 Felony) at the Subject Property. During the execution of a search warrant at the Subject Property, police recovered one (1) plastic container containing cocaine on the bottom shelf of a coffee table in the living room;
  - C. On or about August 5, 2011, resident KENNETH BUTLER committed the criminal offense of possession of cannabis, not more than 2.5 grams (720 ILCS 550/4(a), a Class C Misdemeanor) at the Subject Property. During the execution of a search warrant at the Subject Property, police recovered three (3) bags containing cannabis in the electrical room and two (2) bags containing cannabis on the end table in the living room;
  - D. On or about July 30, 2010, an unknown offender, committed the criminal offense of possession of cocaine, more than 15 grams but less than 100 grams (720 ILCS 570/402(a)(2)(A), a Class 1 felony) at the Subject Property. During the execution of a search warrant at the Subject Property the target of the search warrant Terrell Harris was not present. Present on the scene was owner of the Subject Property Leona Farrell. During the execution of a search warrant at the Subject Property, police recovered ten (10) clear plastic baggies each containing cocaine;
  - E. On or about April 8, 2009, Terrell HARRIS, a Blackstone gang member, committed the criminal offense of possession of cocaine, less than 15 grams (720 ILCS 570/402(c), a Class 4 felony) at the Subject Property. During the execution of a search warrant at the Subject Property, police observed HARRIS throw a clear plastic bag onto the floor containing twenty-six (26) small clear plastic bags containing cocaine;



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- F. On or about November 11, 2008, resident Kenneth BUTLER, committed the criminal offense of possession of cocaine, less than 15 grams (720 ILCS 570/402(c), a Class 4 felony) at the Subject Property. During the execution of a search warrant at the Subject Property, police recovered seven (7) plastic baggies of cocaine;
- G. On or about November 11, 2008, resident Kenneth BUTLER, a convicted felon, committed the criminal offense of unlawful use of a weapon-possession of a firearm by a convicted felon (720 ILCS 5/24-1.1(a), a class 2 felony) at the Subject Property. During the execution of a search warrant at the Subject Property police recovered one (1) H&R Arms .22 Caliber Revolver, serial number 477811;
12. Defendant Leona Farrell encouraged or permitted this illegal activity to occur on the Subject Property in violation of Section 8-4-090 of the Code.

**WHEREFORE**, the City respectfully requests that this Honorable Court:

- A. Find that Defendant Leona Farrell violated § 8-4-090 of the Code in that the Defendants encouraged or permitted illegal activity at the Subject Property;
- B. Fine Defendant Leona Farrell the maximum amount for each instance of criminal activity at the property, pursuant to §8-4-090 (c) of the Municipal Code of Chicago; and
- C. Grant any other relief that this Court deems appropriate.

## COUNT II

### CRIMINAL ACTIVITY- ABATEMENT MEASURES

13. The City realleges paragraphs 1-12 of this Complaint, above and reincorporates those allegations herein as paragraph 13 of Count II and further alleges:
14. The Subject Property is a public nuisance, as defined by §8-4-090 of the Municipal Code of Chicago; and,
15. That the levying of a fine is an inadequate remedy to secure the abatement of the aforestated municipal code violations and the public nuisance, which they constitute.

**WHEREFORE**, the City respectfully requests that this Court:

- A. Find that the Subject Property is a public nuisance, as defined by Section 8-4-090 of the Municipal Code of Chicago;

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- B. Order Defendant Leona Farrell to take action to abate the criminal activity now occurring at the Subject Property, including, but not limited, to the following:
- 1) Vacate and secure the premises;
  - 2) Evict all residents or guests who have been involved in illegal activity at the subject property and bar them permanently from the subject property;
  - 3) Install and maintain additional security measures, including but not limited to, erecting fencing with gate and heavy-duty locks, to ensure that non-residents are not able to use the property for illicit purposes;
  - 4) Install lighting above every entrance to the property and on each corner of the building to deter drug and/or gang activity from occurring on the Subject Property;
  - 5) Install security cameras to monitor the exterior of the Subject Property ;
  - 6) Hire licensed and bonded uniformed security guards to patrol the Subject Property;
  - 7) Post signs forbidding loitering in and around the Subject Property and enforce this rule by calling police, signing complaints, and attending court; and,
  - 8) Any other relief that this Court deems necessary to abate the criminal activity occurring on the Subject Property.

### COUNT III

#### BUILDING CODE VIOLATIONS-CIVIL RELIEF

16. The City re-alleges paragraphs 1-15 of this Complaint, above, and reincorporates those allegations herein as paragraph 16 of Count III and further alleges.
17. All buildings in the City of Chicago must meet the minimum requirements for electrical, plumbing, heating and ventilation and general building requirements. Municipal Code of Chicago, § 13-196-010 (2008), ("Every existing building shall comply with the code requirements in force and applicable to such building...").
18. An owner of, or any person in management or control of, any building or premises that is found to be in violation of the provision of this code shall be liable for any violation therein, existing or occurring. Municipal Code of Chicago, §13-12-020 (2008).
19. Any violation of, or resistance to or interference with the enforcement of, any of the provisions of this Code enumerated in §13-12-010, to which no other penalty provision is

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applicable shall be punished by a fine of not less than \$200.00 and not more than \$500.00, and each day such violation shall continue shall constitute a separate and distinct offence for which a fine as herein provided shall be imposed. Municipal Code of Chicago, §13-12-040 (2008).

20. Specifically, on **November 19, 2010**, and on each succeeding day thereafter, the Defendants as the owners and or managers failed to comply with the Municipal Code of the City of Chicago regarding:

CN138056

- 1) Failure to remove accumulation of refuse and debris and keep premises clean, *specifically yard and lot - garbage and debris*, in violation of §13-196-580,13-196-630 of the Code;

CN067024

- 2) Failure to repair or replace defective eaves, *specifically front elevation rotting fascia*, in violation of §13-196-530 of the Code;

CN196019

- 3) Failure to post address of building in conspicuous place on or near entrance with figures at least 3 inches long for residential, or 6 inches long for commercial building, *specifically post address* in violation of §10-4-050,10-4-090,10-4-100 of the Code;

CN194019

- 4) Failure to replace/repair, *specifically rear abandoned auto*, in violation of §7-28-060 of the Code;

CN070024

- 5) Repair or replace defective or missing members of porch system, *specifically rear deck - no rails, rotting posts*, in violation of §13-196-570 of the Code;

EL0001

- 6) Failure to replace defective lighting service, *specifically replace defective service riser and cables*, in violation of §18-27-230.2 of the Code;

EL0003

- 7) Failure to replace defective meter socket, *specifically replace defective meter box with exposed live parts - DANGEROUS and HAZARDOUS condition*, in violation of §18-27-230.62.66 of the Code;

EL0033

- 8) Failure to strap and secure raceway and armored cable, *specifically properly support 1/2" conduit and service riser at exterior rear area's of building - and disconnect for AC unit*, in violation of §18-27-110.12 of the Code;

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EL0091

- 9) Failure to obtain permit for electrical wiring and equipment installed without permit, *specifically obtain electrical permit and contractor to correct violations*, in violation of §13-12-360 of the Code;

21. Specifically, on **June 15, 2011**, and on each succeeding day thereafter, the Defendants as the owners and or managers failed to comply with the Municipal Code of the City of Chicago regarding:

EL0020

- 1) Failure to support loose light fixture, *specifically properly support light in bedroom closet 1<sup>st</sup> floor*, in violation of §18-27-410.15 of the Code;

EL0023

- 2) Failure to install cover on outlet or junction box, *specifically provide switch covers throughout 1<sup>st</sup> and 2<sup>nd</sup> floor area's*, in violation of §18-27-370.25 of the Code;

EL0084

- 3) Failure to install GFCI outlets, *specifically provide GFCI protection for all kitchen countertop area's, bathroom and laundry area's*, in violation of §18-27-570.8 of the Code;

EL0086

- 4) Failure to provide, *specifically closet lights shall have a totally enclosed lamp, 1<sup>st</sup> and 2<sup>nd</sup> floor area's*, in violation of §18-27-410.8 of the Code;

EL0091

- 5) Failure to obtain permit for electrical wiring and equipment installed without permit, *specifically obtain electrical permit and contractor to correct violations*, in violation of §13-12-360 of the Code;

22. Specifically, on **April 30, 2013**, and on each succeeding day thereafter, the Defendants as the owners and or managers failed to comply with the Municipal Code of the City of Chicago regarding:

EL0091

- 1) Obtain permit for electrical wiring and equipment installed without permit, *specifically for alteration of building electrical service*, pursuant to §13-12-360 of the Code;

EL0004

- 2) Replace defective feeder, *specifically live service conductors run from service unilet (pulling elbow) and not installed in conduit to service panel, DANGEROUS and HAZARDOUS condition*, pursuant to §§18-27-215.2, 18-27-215.3, 18-27-215.4,

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18-27-215.5, 18-27-215.6, 18-27-215.7, 18-27-215.8, 18-27-215.10, 18-27-215.11 of the Code;

EL0001

- 3) Replace defective lighting service, *specifically service disconnect exceeds 5 feet from entry*, pursuant to §18-27-230.2 of the Code;

EL0005

- 4) Replace defective distribution equipment, *specifically electrical service panel has exposed live wires and is hot tapped into open panel, DANGEROUS and HAZARDOUS condition*, pursuant to §§18-27-384.13, 18-27-384.15, 18-27-384.16, 18-27-384.17 of the Code;

EL0029

- 5) Remove exposed wiring, *specifically live service conductors from exterior service metering side of service conduit (unilet LB) across doorway porch and yard, through open kitchen window across kitchen floor and terminated in open electrical panel enclosure, DANGEROUS and HAZARDOUS condition*, pursuant to §18-27-300.4 of the Code;

EL0084

- 6) Repair bond neutral at service disconnect pursuant to §18-27-250.24 of the Code;

EL0006

- 7) Install proper size grounding conductor, *specifically ground service at service disconnect enclosure*, pursuant to §§18-27-250.20, 18-27-250.66 of the Code;

23. Specifically, on **May 22, 2013**, and on each succeeding day thereafter, the Defendants as the owners and or managers failed to comply with the Municipal Code of the City of Chicago regarding:

CN136026

- 1) Exterminate insects and keep dwelling insect-free, *specifically property must be effectively treated to exterminate bed bugs throughout by employing an experienced exterminator in abating bed bug infestations – violation may not be complied with unless proof of exterminator is shown*, pursuant to §13-196-630 C of the Code;

**WHEREFORE**, the City respectfully requests that this Honorable Court to issue a fine against Defendants as provided under §13-12-020 of the Code and in accordance with §13-12-040, of \$500.00 per violation per day, beginning **November 19, 2010** for violations listed in paragraph 20 (1-9), beginning **June 15, 2011** for violations listed in paragraph 21 (1-5), beginning **April 30, 2013** for violations listed in paragraph 22 (1-7), and beginning **May 22, 2013** for violations listed in paragraph 23 (1) until the day this Court enters a finding.

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## COUNT IV

### BUILDING CODE VIOLATIONS - EQUITABLE RELIEF

24. The City re-alleges paragraphs 1-15 of this Complaint and paragraphs 16-22 of Count III above, and reincorporates those allegations herein as paragraph 23 of Count IV and further alleges:
25. That the levying of a fine is an inadequate 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.
26. The subject property fails to meet the minimum requirements of the Municipal Code of Chicago as described in the preceding paragraphs.
27. The Injunction Statute for Building and Zoning Violations provides, in pertinent part, that:
- In case any building or structure, including fixtures, is constructed . . . or maintained, or any building or structure, including fixtures, or land, is used in violation of an ordinance or ordinances . . . the proper local authorities of the municipality . . . in addition to other remedies, may institute any appropriate action or proceeding . . . (4) to restrain, correct or abate the violation.
- See 65 ILCS 5/11-31-2(a) (2004); see also Municipal Code of Chicago § 13-12-070 (2000) (City may obtain an injunction requiring compliance with the provisions of the Building Code.)
28. The Illinois Municipal Code provides, in pertinent part, that:
- If the appropriate official of any municipality determines, upon due investigation, that any building or structure therein fails to conform to the minimum standards of health and safety as set forth in the applicable ordinances of such municipality, and the owner or owners of such building or structure fails, after due notice, to cause such property so to conform, the municipality may make application to the circuit court for an injunction requiring compliance with such ordinances or for such other order as the court may deem necessary or appropriate to secure such compliance.
- See 65 ILCS 5/11-31-2 (2004).
29. Preliminary and permanent injunctive relief is necessary to end the conduct of those defendants who own, control or otherwise manage the subject property in violation of the requirements of the Municipal Code of Chicago.

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30. Moreover, the failure of the defendants who own, control or otherwise manage the subject property to maintain the subject property according to the minimum requirements of the Municipal Code of Chicago constitutes an ongoing injury to the public health, safety and welfare, for which there is no adequate remedy at law. See Municipal Code of Chicago §13-12-010 (2000) ("In interpreting and applying said provisions of this code, such provisions shall in every instance be held to be the minimum requirements adopted for the protection and promotion of the public health, safety and welfare."). The prosecution and fining alone of these defendants will not promptly abate the nuisance.
31. Where a statute or ordinance authorizes injunctive relief, a municipality need only show that the statute or ordinance was violated to obtain injunctive relief. See Village of Riverdale v. Allied Waste Trans., 334 Ill. App. 3d 224, 228-29 (1st Dist. 2002); City of Chicago v. Krisjon Constr., 246 Ill. App. 3d 950, 959 (1st Dist. 1993); City of Chicago v. Piotrowski, 215 Ill. App. 3d 829, 834-35 (1st Dist. 1991).

**WHEREFORE**, the City respectfully requests that this Honorable Court to:

- A. Order Defendants as follows:
- 1) Immediately repair all of the above-listed violations;
  - 2) Allow a complete interior and exterior inspection by the City of Chicago building inspectors to verify that all required repairs have been completed and are in compliance with all applicable laws and standards;
  - 3) Obtain all of the necessary permits required to perform the work; and,
  - 4) Hire licensed and bonded electricians and plumbers to do the necessary work, where applicable;
- B. Appoint a receiver to correct the conditions alleged in the Complaint with full powers of receivership, including the right to issue and sell receivers certificates in accordance with 65 ILCS 5/11-31-2, as amended;
- C. For an order authorizing the plaintiff to demolish, repair, enclose or clean up the Subject Property, if necessary, and a judgment against defendants and 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 the City of Chicago a judicial deed to the property if declared abandoned;

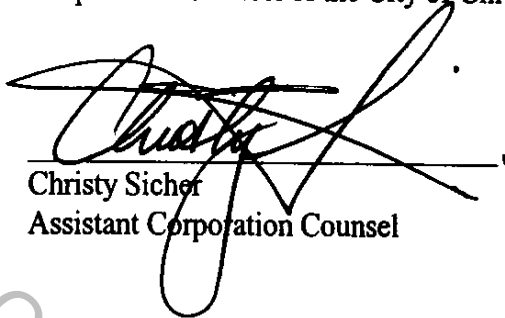
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- E. If a statutory lien is obtained in this proceeding under 65 ILCS 5/11-31-1 or 65 ILCS 5/11-31-2, as amended and for an order permitting foreclosure of said lien in this proceeding;
- F. Award to the City court costs, attorney's fees and other costs related to the enforcement of 65 ILCS 5/11-31-1(a) against the defendants; and,
- D. Any other relief that this Court deems appropriate.

Respectfully submitted,

Stephen R. Patton  
Corporation Counsel of the City of Chicago

By:



Christy Sicher  
Assistant Corporation Counsel

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Chicago, Illinois 60602  
City of Chicago Department of Law  
Building and License Enforcement Unit  
(312) 744-6958

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

CITY OF CHICAGO,	)	No: 11 M1 400617
a municipal corporation,	)	
Plaintiff,	)	Re: 8020 S. Emerald
v.	)	Chicago, IL
	)	
LEONA FARRELL, COUNTRYWIDE	)	PIN: 20-33-108-042-0000
HOME LOANS, INC., UNKNOWN	)	
OWNERS and NON-RECORD	)	
CLAIMANTS,	)	
Defendants.	)	

### FOURTH AMENDED COMPLAINT

Plaintiff City of Chicago ("City"), by its attorney, Corporation Counsel Stephen R. Patton, complains of 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, par. 6(a). As a further grant of authority, the City brings this action pursuant to the Unsafe Property Statute, 65 ILCS 5/11-31-1(a) et seq. (2004), as amended, the Injunction Statute for Building and Zoning Violations, 65 ILCS 5/11-13-15 (2005) and Chicago Municipal Code ("Code"). By bringing this action, the City seeks to abate the 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. There is a property commonly known as **8020 S. EMERALD**, Chicago, Illinois ("Subject Property"), with a property index number **20-33-108-042-0000** and a legal description as follows:

THE SOUTH 15 FEET OF 8 INCHES OF THE NORTH 89 FEET OF THE WEST 133 FEET OF LOT 2 IN BARNHARTS SUBDIVISION OF 131.01 FEET LYING SOUTH OF AND ADJOINING THE NORTH 12 CHAINS 30 LINKS OF THE NORTHWEST 1/4 OF SECTION 33, TOWNSHIP 38

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NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN,  
LYING WEST OF CHICAGO, ROCK ISLAND AND PACIFIC  
RAILROAD, IN COOK COUNTY, ILLINOIS.

4. Located on the Subject Property is a two-story, single family, frame townhouse.
5. At all times relevant to this complaint, the Defendants owned, managed, controlled, collected rents from, contributed to the ongoing violations at, and/or had a legal or equitable interest in the Subject Property. More specifically:
  - A. Defendant **LEONA FARRELL** has an ownership interest in the Subject Property;
  - C. Defendant **COUNTRYWIDE HOME LOANS, INC.** has a mortgagee interest in the Subject Property;
  - D. All remaining defendants are unknown owners and non-record claimants of the Subject Property.

## COUNT I

### CRIMINAL ACTIVITY- CIVIL PENALTIES

6. The City re-alleges paragraphs 1-5 of the General Allegations, above, and reincorporates those allegations herein as paragraph 6 of Count 1 and further alleges:
7. The City brings this action pursuant to the **Drug and Gang Houses, Houses of Prostitution and Other Disorderly Houses Ordinance**, Section 8-4-090 of the Code.
8. Section 8-4-090 of the Code provides that any premises used for prostitution, illegal gambling, illegal possession or delivery of or trafficking in controlled substances, or any other activity that constitutes a felony, misdemeanor, business offense or petty offense under federal, state or municipal law is declared to be a public nuisance, provided that the property is used for more than one such offense within any six month period, or the offense is punishable by imprisonment for one year or more.
9. Section 8-4-090 further provides for any person who owns, manages, or controls such premises and who encourages or permits illegal activity to occur or continue shall be subject to a fine. This fine shall not be less than \$3,000 and not more than \$6,000 for any offense defined as a class X felony by the Criminal Code of 1961, 720 ILCS 5 ("Criminal Code"); not less than \$1,500 and not more than \$3,000 for any offense defined as a Class 1 felony by the Criminal Code; not less than \$700 and not more than \$1,400 for any offense defined as a Class 2 felony by the Criminal Code; not less than \$500 and not more than \$1,000 for any offense defined as a Class 3 felony by the Criminal Code; not less than \$300 and not more than \$1,000 for any offense defined as a Class 4 felony by the Criminal Code; and not less than \$200 and not more than \$1,000 for all offenses not otherwise specified. Each day that a

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violation of this section continues is a separate and distinct offense.

10. During the time that Defendant Leona Farrell owned and/or controlled the Subject Property, they encouraged or permitted criminal activity on or about the Subject Property.
11. According to reports created and maintained by the Chicago Police Department, the following activity constituting a felony, misdemeanor, business offense or petty offense under federal, state or municipal law, occurred at the Subject Property. Specifically:
  - A. On or about August 5, 2011, resident KENNETH BUTLER committed the criminal offense of manufacturing and or delivering of a controlled substance, more than 1 gram but less than 15 grams of heroin, (720 ILCS 570/401(c)(1), a Class 1 Felony) at the Subject Property. During the execution of a search warrant at the Subject Property, police observed BUTLER drop one (1) clear plastic bag containing fifty-four (54) yellow tinted zip lock bags of heroin to the ground from his right hand;
  - B. On or about August 5, 2011, resident KENNETH BUTLER committed the criminal offense of manufacturing and or delivering of a controlled substance, more than 1 gram but less than 15 grams of cocaine, (720 ILCS 570/401(c)(2), a Class 1 Felony) at the Subject Property. During the execution of a search warrant at the Subject Property, police recovered one (1) plastic container containing cocaine on the bottom shelf of a coffee table in the living room;
  - C. On or about August 5, 2011, resident KENNETH BUTLER committed the criminal offense of possession of cannabis, not more than 2.5 grams (720 ILCS 550/4(a), a Class C Misdemeanor) at the Subject Property. During the execution of a search warrant at the Subject Property, police recovered three (3) bags containing cannabis in the electrical room and two (2) bags containing cannabis on the end table in the living room;
  - D. On or about July 30, 2010, an unknown offender, committed the criminal offense of possession of cocaine, more than 15 grams but less than 100 grams (720 ILCS 570/402(a)(2)(A), a Class 1 felony) at the Subject Property. During the execution of a search warrant at the Subject Property the target of the search warrant Terrell Harris was not present. Present on the scene was owner of the Subject Property Leona Farrell. During the execution of a search warrant at the Subject Property, police recovered ten (10) clear plastic baggies each containing cocaine;
  - E. On or about April 8, 2009, Terrell HARRIS, a Blackstone gang member, committed the criminal offense of possession of cocaine, less than 15 grams (720 ILCS 570/402(c), a Class 4 felony) at the Subject Property. During the execution of a search warrant at the Subject Property, police observed HARRIS throw a clear plastic bag onto the floor containing twenty-six (26) small clear plastic bags containing cocaine;

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- F. On or about November 11, 2008, resident Kenneth BUTLER, committed the criminal offense of possession of cocaine, less than 15 grams (720 ILCS 570/402(c), a Class 4 felony) at the Subject Property. During the execution of a search warrant at the Subject Property, police recovered seven (7) plastic baggies of cocaine;
- G. On or about November 11, 2008, resident Kenneth BUTLER, a convicted felon, committed the criminal offense of unlawful use of a weapon-possession of a firearm by a convicted felon (720 ILCS 5/24-1.1(a), a class 2 felony) at the Subject Property. During the execution of a search warrant at the Subject Property police recovered one (1) H&R Arms .22 Caliber Revolver, serial number 477811;
12. Defendant Leona Farrell encouraged or permitted this illegal activity to occur on the Subject Property in violation of Section 8-4-090 of the Code.

**WHEREFORE**, the City respectfully requests that this Honorable Court:

- A. Find that Defendant Leona Farrell violated § 8-4-090 of the Code in that the Defendants encouraged or permitted illegal activity at the Subject Property;
- B. Fine Defendant Leona Farrell the maximum amount for each instance of criminal activity at the property, pursuant to §8-4-090 (c) of the Municipal Code of Chicago; and
- C. Grant any other relief that this Court deems appropriate.

## COUNT II

### CRIMINAL ACTIVITY- ABATEMENT MEASURES

13. The City realleges paragraphs 1-12 of this Complaint, above and reincorporates those allegations herein as paragraph 13 of Count II and further alleges:
14. The Subject Property is a public nuisance, as defined by §8-4-090 of the Municipal Code of Chicago; and,
15. That the levying of a fine is an inadequate remedy to secure the abatement of the aforesated municipal code violations and the public nuisance, which they constitute.

**WHEREFORE**, the City respectfully requests that this Court:

- A. Find that the Subject Property is a public nuisance, as defined by Section 8-4-090 of the Municipal Code of Chicago;

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- B. Order Defendant Leona Farrell to take action to abate the criminal activity now occurring at the Subject Property, including, but not limited, to the following:
- 1) Vacate and secure the premises;
  - 2) Evict all residents or guests who have been involved in illegal activity at the subject property and bar them permanently from the subject property;
  - 3) Install and maintain additional security measures, including but not limited to, erecting fencing with gate and heavy-duty locks, to ensure that non-residents are not able to use the property for illicit purposes;
  - 4) Install lighting above every entrance to the property and on each corner of the building to deter drug and/or gang activity from occurring on the Subject Property;
  - 5) Install security cameras to monitor the exterior of the Subject Property ;
  - 6) Hire licensed and bonded uniformed security guards to patrol the Subject Property;
  - 7) Post signs forbidding loitering in and around the Subject Property and enforce this rule by calling police, signing complaints, and attending court; and,
  - 8) Any other relief that this Court deems necessary to abate the criminal activity occurring on the Subject Property.

## COUNT III BUILDING CODE VIOLATIONS-CIVIL RELIEF

16. The City re-alleges paragraphs 1-15 of this Complaint, above, and reincorporates those allegations herein as paragraph 16 of Count III and further alleges.
17. All buildings in the City of Chicago must meet the minimum requirements for electrical, plumbing, heating and ventilation and general building requirements. Municipal Code of Chicago, § 13-196-010 (2008), ("Every existing building shall comply with the code requirements in force and applicable to such building...").
18. An owner of, or any person in management or control of, any building or premises that is found to be in violation of the provision of this code shall be liable for any violation therein, existing or occurring. Municipal Code of Chicago, §13-12-020 (2008).
19. Any violation of, or resistance to or interference with the enforcement of, any of the provisions of this Code enumerated in §13-12-010, to which no other penalty provision is

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applicable shall be punished by a fine of not less than \$200.00 and not more than \$500.00, and each day such violation shall continue shall constitute a separate and distinct offence for which a fine as herein provided shall be imposed. Municipal Code of Chicago, §13-12-040 (2008).

20. Specifically, on **November 19, 2010**, and on each succeeding day thereafter, the Defendants as the owners and or managers failed to comply with the Municipal Code of the City of Chicago regarding:

CN138056

- 1) Failure to remove accumulation of refuse and debris and keep premises clean, *specifically yard and lot - garbage and debris*, in violation of §13-196-580,13-196-630 of the Code;

CN067024

- 2) Failure to repair or replace defective eaves, *specifically front elevation rotting fascia*, in violation of §13-196-530 of the Code;

CN196019

- 3) Failure to post address of building in conspicuous place on or near entrance with figures at least 3 inches long for residential, or 6 inches long for commercial building, *specifically post address*, in violation of §10-4-050,10-4-090,10-4-100 of the Code;

CN194019

- 4) Failure to replace/repair, *specifically rear abandoned auto*, in violation of §7-28-060 of the Code;

CN070024

- 5) Repair or replace defective or missing members of porch system, *specifically rear deck - no rails, rotting posts*, in violation of §13-196-570 of the Code;

EL0001

- 6) Failure to replace defective lighting service, *specifically replace defective service riser and cables*, in violation of §18-27-230.2 of the Code;

EL0003

- 7) Failure to replace defective meter socket, *specifically replace defective meter box with exposed live parts - DANGEROUS and HAZARDOUS condition*, in violation of §18-27-230.62.66 of the Code;

EL0033

- 8) Failure to strap and secure raceway and armored cable, *specifically properly support ½" conduit and service riser at exterior rear area's of building - and disconnect for AC unit*, in violation of §18-27-110.12 of the Code;

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EL0091

- 9) Failure to obtain permit for electrical wiring and equipment installed without permit, *specifically obtain electrical permit and contractor to correct violations*, in violation of §13-12-360 of the Code;

21. Specifically, on **June 15, 2011**, and on each succeeding day thereafter, the Defendants as the owners and or managers failed to comply with the Municipal Code of the City of Chicago regarding:

EL0020

- 1) Failure to support loose light fixture, *specifically properly support light in bedroom closet 1<sup>st</sup> floor*, in violation of §18-27-410.15 of the Code;

EL0023

- 2) Failure to install cover on outlet or junction box, *specifically provide switch covers throughout 1<sup>st</sup> and 2<sup>nd</sup> floor area's*, in violation of §18-27-370.25 of the Code;

EL0084

- 3) Failure to install GFCI outlets, *specifically provide GFCI protection for all kitchen countertop area's, bathroom and laundry area's*, in violation of §18-27-570.8 of the Code;

EL0086

- 4) Failure to provide, *specifically closet lights shall have a totally enclosed lamp, 1<sup>st</sup> and 2<sup>nd</sup> floor area's*, in violation of §18-27-410.8 of the Code;

EL0091

- 5) Failure to obtain permit for electrical wiring and equipment installed without permit, *specifically obtain electrical permit and contractor to correct violations*, in violation of §13-12-360 of the Code;

22. Specifically, on **April 30, 2013**, and on each succeeding day thereafter, the Defendants as the owners and or managers failed to comply with the Municipal Code of the City of Chicago regarding:

EL0091

- 1) Obtain permit for electrical wiring and equipment installed without permit, *specifically for alteration of building electrical service*, pursuant to §13-12-360 of the Code;

EL0004

- 2) Replace defective feeder, *specifically live service conductors run from service unilet (pulling elbow) and not installed in conduit to service panel, DANGEROUS and HAZARDOUS condition*, pursuant to §§18-27-215.2, 18-27-215.3, 18-27-215.4,

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18-27-215.5, 18-27-215.6, 18-27-215.7, 18-27-215.8, 18-27-215.10, 18-27-215.11 of the Code;

EL0001

- 3) Replace defective lighting service, *specifically service disconnect exceeds 5 feet from entry*, pursuant to §18-27-230.2 of the Code;

EL0005

- 4) Replace defective distribution equipment, *specifically electrical service panel has exposed live wires and is hot tapped into open panel, DANGEROUS and HAZARDOUS condition*, pursuant to §§18-27-384.13, 18-27-384.15, 18-27-384.16, 18-27-384.17 of the Code;

EL0029

- 5) Remove exposed wiring, *specifically live service conductors from exterior service metering side of service conduit (unilet LB) across doorway porch and yard, through open kitchen window across kitchen floor and terminated in open electrical panel enclosure, DANGEROUS and HAZARDOUS condition*, pursuant to §18-27-300.4 of the Code;

EL0084

- 6) Repair bond neutral at service disconnect pursuant to §18-27-250.24 of the Code;

EL0006

- 7) Install proper size grounding conductor, *specifically ground service at service disconnect enclosure*, pursuant to §§18-27-250.20, 18-27-250.66 of the Code;

23. Specifically, on **May 22, 2013**, and on each succeeding day thereafter, the Defendants as the owners and or managers failed to comply with the Municipal Code of the City of Chicago regarding:

CN136026

- 1) Exterminate insects and keep dwelling insect-free, *specifically property must be effectively treated to exterminate bed bugs throughout by employing an experienced exterminator in abating bed bug infestations – violation may not be completed with unless proof of exterminator is shown*, pursuant to §13-196-630 C of the Code;

**WHEREFORE**, the City respectfully requests that this Honorable Court to issue a fine against Defendants as provided under §13-12-020 of the Code and in accordance with §13-12-040, of \$500.00 per violation per day, beginning **November 19, 2010** for violations listed in paragraph 20 (1-9), beginning **June 15, 2011** for violations listed in paragraph 21 (1-5), beginning **April 30, 2013** for violations listed in paragraph 22 (1-7), and beginning **May 22, 2013** for violations listed in paragraph 23 (1) until the day this Court enters a finding.



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## COUNT IV

### BUILDING CODE VIOLATIONS - EQUITABLE RELIEF

24. The City re-alleges paragraphs 1-15 of this Complaint and paragraphs 16-22 of Count III above, and reincorporates those allegations herein as paragraph 23 of Count IV and further alleges:
25. That the levying of a fine is an inadequate 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.
26. The subject property fails to meet the minimum requirements of the Municipal Code of Chicago as described in the preceding paragraphs.
27. The Injunction Statute for Building and Zoning Violations provides, in pertinent part, that:
- In case any building or structure, including fixtures, is constructed . . . or maintained, or any building or structure, including fixtures, or land, is used in violation of an ordinance or ordinances . . . the proper local authorities of the municipality . . . in addition to other remedies, may institute any appropriate action or proceeding . . . (4) to restrain, correct or abate the violation.
- See 65 ILCS 5/11-31-2(a) (2004); see also Municipal Code of Chicago § 13-12-070 (2000) (City may obtain an injunction requiring compliance with the provisions of the Building Code.)
28. The Illinois Municipal Code provides, in pertinent part, that:
- If the appropriate official of any municipality determines, upon due investigation, that any building or structure therein fails to conform to the minimum standards of health and safety as set forth in the applicable ordinances of such municipality, and the owner or owners of such building or structure fails, after due notice, to cause such property so to conform, the municipality may make application to the circuit court for an injunction requiring compliance with such ordinances or for such other order as the court may deem necessary or appropriate to secure such compliance.
- See 65 ILCS 5/11-31-2 (2004).
29. Preliminary and permanent injunctive relief is necessary to end the conduct of those defendants who own, control or otherwise manage the subject property in violation of the requirements of the Municipal Code of Chicago.

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30. Moreover, the failure of the defendants who own, control or otherwise manage the subject property to maintain the subject property according to the minimum requirements of the Municipal Code of Chicago constitutes an ongoing injury to the public health, safety and welfare, for which there is no adequate remedy at law. See Municipal Code of Chicago §13-12-010 (2000) ("In interpreting and applying said provisions of this code, such provisions shall in every instance be held to be the minimum requirements adopted for the protection and promotion of the public health, safety and welfare."). The prosecution and fining alone of these defendants will not promptly abate the nuisance.
31. Where a statute or ordinance authorizes injunctive relief, a municipality need only show that the statute or ordinance was violated to obtain injunctive relief. See Village of Riverdale v. Allied Waste Trans., 334 Ill. App. 3d 224, 228-29 (1st Dist. 2002); City of Chicago v. Krisjon Constr., 246 Ill. App. 3d 950, 959 (1st Dist. 1993); City of Chicago v. Piotrowski, 215 Ill. App. 3d 829, 834-35 (1st Dist. 1991).

**WHEREFORE**, the City respectfully requests that this Honorable Court to:

- A. Order Defendants as follows:
- 1) Immediately repair all of the above-listed violations;
  - 2) Allow a complete interior and exterior inspection by the City of Chicago building inspectors to verify that all required repairs have been completed and are in compliance with all applicable laws and standards;
  - 3) Obtain all of the necessary permits required to perform the work; and,
  - 4) Hire licensed and bonded electricians and plumbers to do the necessary work, where applicable;
- B. Appoint a receiver to correct the conditions alleged in the Complaint with full powers of receivership, including the right to issue and sell receivers certificates in accordance with 65 ILCS 5/11-31-2, as amended;
- C. For an order authorizing the plaintiff to demolish, repair, enclose or clean up the Subject Property, if necessary, and a judgment against defendants and 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 the City of Chicago a judicial deed to the property if declared abandoned;

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- E. If a statutory lien is obtained in this proceeding under 65 ILCS 5/11-31-1 or 65 ILCS 5/11-31-2, as amended and for an order permitting foreclosure of said lien in this proceeding;
- F. Award to the City court costs, attorney's fees and other costs related to the enforcement of 65 ILCS 5/11-31-1(a) against the defendants; and,
- D. Any other relief that this Court deems appropriate.

Respectfully submitted,

Stephen R. Patton  
Corporation Counsel of the City of Chicago

By:

  
Christy Sicher  
Assistant Corporation Counsel

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