



Doc#: 1422041091 Fee: \$54.00
Karen A. Yarbrough
Cook County Recorder of Deeds
Date: 08/08/2014 04:08 PM Pg: 1 of 9

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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: 14 M1 400079
Plaintiff,)	
)	Property Address: 7248 S VERNON
v.)	CHICAGO, IL
)	Room: 1105, Richard J. Daley Center
EQUITY ENTERPRISES)	
MANAGEMENT INC., et al.)	
Defendant(s))	Lien Amount: \$9,971.74

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 10 IN BLOCK 2 IN LEE BROTHERS' ADDITION TO PARK MANOR, BEING A SUBDIVISION OF THE SOUTH WEST (1/4) OF THE NORTH WEST 1/4 OF THE NORTH EAST 1/4 OF SECTION 27, TOWNSHIP 38 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

Commonly Known as: 7248 S VERNON, CHICAGO, IL 60619
P.I.N.: 20-27-208-030-0000

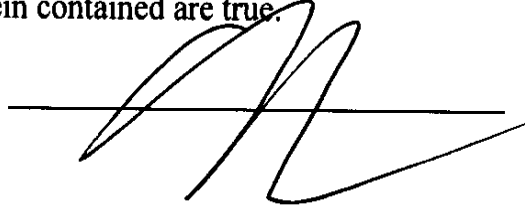
The aforesaid lien arises out of City of Chicago vs. EQUITY ENTERPRISES MANAGEMENT INC., et al., Case No. 14M1400079 filed in the Circuit Court of Cook County, in which a receiver was appointed for said property by Court Order dated 01/21/2014. The receiver incurred expenses approved by the Court, pursuant to an order entered 06/26/2014. Pursuant thereto, the receiver issues a certificate in the amount of \$9,971.74 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 ~~06/27/2014~~ claims a lien on the above cited real estate for the amount of \$9,971.74 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

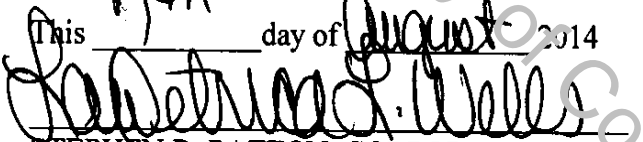
Steven Q. McKenzie, Assistant Corporation Counsel, being first duly sworn on oath, deposes and says that he is the authorized agent for the City of Chicago, that he has read the foregoing Claim for Lien, knows the content thereof, and that all statements therein contained are true.



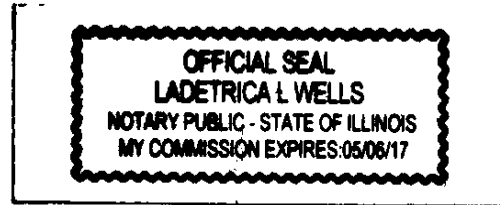
SUBSCRIBED AND SWORN TO BEFORE ME

By Steven Q. McKenzie

This 9th day of August, 2014



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



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: 14-M1-400079
)	
Plaintiff,)	Property Address:
v.)	7248 South Vernon
Equity Enterprises Management, Inc. , et al)	<u>CHICAGO, IL. 60619</u>
)	
)	Courtroom: <u>1105</u>
Defendant (s))	Richard J. Daley Center

RECEIVER'S CERTIFICATE

The undersigned Globetrotters Engineering Corporation was appointed heat receiver by the court on January 21, 2014 and ordered to restore heat and hot water to the premises. For value received, the receiver in his official capacity and not individually promises to pay to bearer the sum of \$9,971.74 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 June 26, 2014 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: 20-27-208-030-0000

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: 6/27/14


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: 14 - M1 - 400079
)	
Plaintiff,)	Address: 7248 South Vernon
)	
V.)	Chicago, IL. 60619
)	
Equity Enterprises Management, Inc., et al))	
)	Courtroom: 1105
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 January 21, 2014, Globetrotters Engineering Corporation was appointed limited receiver for the purpose of restoring heat and hot water to the premises.
2. The receiver performed services as detailed in the accounting for fees and expenses from January 21, 2014 through and including May 29, 2014.
3. The receiver's accounting states that in the course of fulfilling its duties it incurred out of pocket costs totaling \$5,049.64 and \$5,229.00 in fees were billed for a combined total of \$10,278.64. Defense council Ashley Cristofani was in court, and has no objections to the receiver's accounting.
4. After thorough consideration of the Motion and attached exhibits, \$ 5049.64 in out of pocket costs and \$ 4922.10 in fees for a total of \$ 9971.74 is reasonable compensation for work completed.

IT IS ORDERED:

- A. Globetrotters Engineering Corporation's costs and fees of \$ 9971.74 are hereby approved and the request to issue a receiver's certificate in that amount. Interest shall accrue on unpaid amounts from the date of this order is entered at 10% per annum.
- B. The certificate issues pursuant to the provisions of the Illinois Compiled Statutes, Chapter 65, Section 5/11-31-2.

Hearing Date: June 26, 2014

Entered:


Associate Judge Pamela Hughes Gillespie

JUN 26 2014

Circuit Court - 1953

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 *Gillespie*, Room 1105

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

THE CITY OF CHICAGO, a municipal corporation,
Plaintiff,

v.

EQUITY ENTERPRISE MANAGEMENT, INC,
UNKNOWN OWNERS and
NONRECORD CLAIMANTS,
Defendants.

Case No.

14M1 400079

Address: 7248 S VERNON AVE
CHICAGO, IL 60619

Amount claimed per day: \$2,500.00

Courtroom 1105

COMPLAINT FOR EQUITABLE AND OTHER RELIEF

Plaintiff, THE CITY OF CHICAGO, a municipal corporation, by and through Stephen R. Patton, Corporation Counsel, complains of the defendants as follows:

COUNT I

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

PIN(s): 20-27-208-030-0000

LOT 10 IN BLOCK 2 IN LEE BROTHERS' ADDITION TO PARK MANOR, BEING A SUBDIVISION OF THE SOUTH WEST (1/4) OF THE NORTH WEST 1/4 OF THE NORTH EAST 1/4 OF SECTION 27, TOWNSHIP 38 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS

commonly known as 7248 S VERNON AVE CHICAGO, IL 60619, (the "subject property") and located thereon is a 3 STORY BUILDING WITH 3 DWELLING UNIT(S) AND 0 NON-RESIDENTIAL UNIT(S).

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 subject property on the date(s) herein set forth:

EQUITY ENTERPRISE MANAGEMENT, INC, RECORD OWNER

UNKNOWN OWNERS and NONRECORD CLAIMANTS

On JANUARY 6, 2014, and on each succeeding day, and on numerous other occasions, Defendants have failed to comply with the Municipal Code of Chicago as follows:

- 1) CN 132016
Failure to adequately heat dwelling unit adequately from September 15th to June 1st at a minimum temperature of 68 degrees at 8:30 a.m. and thereafter until 10:30 p.m. and 66 degrees at 10:30 p.m. and thereafter until 8:30 a.m. averaged throughout the family unit or rooming unit. (Municipal Code of Chicago, § 13-196-410)
3RD FLOOR UNIT 60 DEGREES
- 2) CN 046013
Stop using unapproved device, cooking or water heating device as heating device. (13-196-400)
TENANT USING SPACE HEATERS AND OVEN TO HEAT THE UNIT. CHILDREN IN UNIT.

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- 3) CN 197019
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 stair, and within 15 feet of all sleeping rooms. Be sure detectors are installed at least 4 inches from the wall, 4-12 inches from the ceiling and not above doors or windows.
3RD FLOOR UNIT HAS NO SMOKE DETECTORS.
- 4) PL154027
Supply adequate hot water with minimum temperature of 120 degrees F. (13-196-430)
3RD FLOOR UNIT HAS NO HOT WATER-WATER SHUT OFF.
- 5) PL154027
Supply adequate hot water with minimum temperature of 120 degrees F. (13-196-430)
3RD FLOOR UNIT HAS NO COLD WATER-WATER SHUFF OFF TO UNIT.

That Felicia Davis is the Acting Commissioner of Buildings of the City of Chicago and as such and pursuant to the Municipal Code of Chicago caused inspection(s) to be conducted by City inspectors who have knowledge of the facts stated in this complaint.

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 judgment against the defendants, as provided under 13-12-020 of the Municipal Code of Chicago, in the amount of \$3,500.00 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.

For a personal judgment against each defendant in an amount equal to the costs incurred by the City, including litigation costs, inspection costs, and attorneys' fees, in providing services reasonably related to defendants' violation(s) of the Municipal Code of Chicago pursuant to Section 1-20-020 of the Municipal Code of Chicago.

COUNT II

Plaintiff, THE CITY OF CHICAGO, a municipal corporation, realleges each allegation set forth in each paragraph of Count I as if fully set forth herein and further alleges:

That the levying of a fine is not an adequate remedy to secure the abatement of the municipal code violations set forth above 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.

That Felicia Davis, Acting Commissioner of Buildings of the City of Chicago, has determined said building(s) and property do not comply with the minimum standards of health and safety set forth in the Building Code of the City of Chicago.

WHEREFORE, Plaintiff prays:

For a temporary and permanent injunction requiring the defendants to correct the violations alleged in the complaint and to restrain future violations permanently, pursuant to 65 ILCS 5/11-31-1 (a), 5/11-31-2 and 5/11-13-15 and Section 13-12-070 of the Municipal Code of Chicago.

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For the appointment of receiver, if necessary, to correct the conditions alleged in the Complaint with the full powers of receivership including the right to issue and sell receivers certificates in accordance with Section 5/11-31-2 of Chapter 65 of the Illinois Compiled Statutes, as amended.

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.

If appropriate and under proper petition, for an order declaring the property abandoned under Section 5/11-31-1 (d) of Chapter 65 of the Illinois Compiled Statutes as amended and for an order granting City of Chicago a judicial deed to the property if declared abandoned.

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.

For reasonable attorney fees and litigation and court costs.

For such other and further relief as may be necessary in the premises and which the court shall deem necessary.

Respectfully Submitted,
STEPHEN R. PATTON
CORPORATION COUNSEL

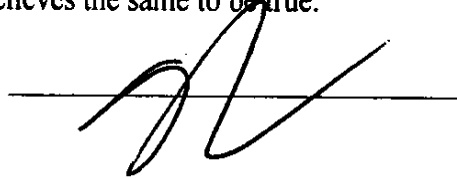
By: 
STEVE MCKENZIE
Assistant Corporation Counsel

City of Chicago
Corporation Counsel #90909
Building and License Enforcement Division
30 North LaSalle Street, Room 700
Chicago, Illinois 60602
(312) 744-8791

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CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements forth in this instrument are true and correct, except as to matters therein states to be on information and belief and as to such matters the undersigned certifies as a foresaid the he verily believes the same to be true.



Stephen R Patton
Corporation Counsel
Attorney for Plaintiff

BY: _____
Assistant Corporation Counsel
30 North LaSalle #700
Chicago IL 60602
Aty No 90909
(312) 744-8791

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