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Karen A. Yarbrough  
Cook County Recorder of Deeds  
Date: 10/28/2014 02:30 PM Pg: 1 of 10

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

CITY OF CHICAGO, a municipal corporation, )  
Plaintiff, )  
v. )  
THE UNKNOWN HEIRS AND LEGATEES )  
OF VIOLA JOHNSON, et al. )  
Defendant(s) )

CASE NO: 13 M1 403489  
Property Address: 8449 S. EUCLID  
CHICAGO, IL  
Room: 1105, Richard J. Daley Center  
Lien Amount: \$ 9,224.11

**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 29 (EXCEPT THE SOUTH 1.45 FEET THEREOF) AND THE SOUTH 9.30 FEET IF KIT 30, IN BLOCK 9 OF CONSTANCE, BEING A SUBDIVISION OF THE EAST 1/2 OF THE SOUTHWEST 1/4 OF SECTION 38, TOWN 38, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN.

**Commonly Known as:** 8449 S. EUCLID, CHICAGO, IL 60617

**P.I.N.:** 20-36-315-016-0000

The aforesaid lien arises out of City of Chicago vs. THE UNKNOWN HEIRS AND LEGATEES OF VIOLA JOHNSON, et al., Case No. 13M1403489 filed in the Circuit Court of Cook County, in which a receiver was appointed for said property by Court Order dated 12/12/2013. The receiver incurred expenses approved by the Court, pursuant to an order entered 09/16/2014. Pursuant thereto, the receiver issues a certificate in the amount of \$9,224.11 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 10/17/2014 claims a lien on the above cited real estate for the amount of \$9,224.11 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.

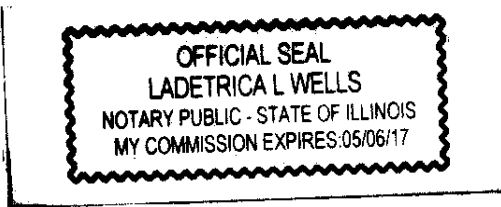
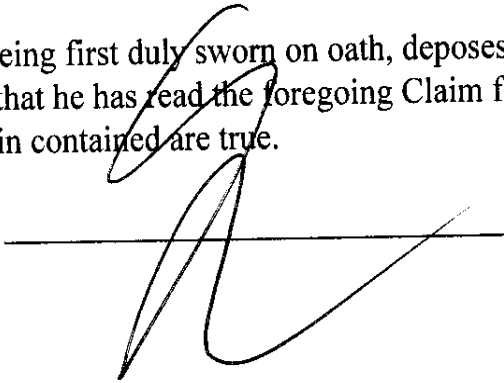
SUBSCRIBED AND SWORN TO BEFORE ME

BY Steven Q. McKenzie

This 28 day of October 2014

LaDetricia L. Wells

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



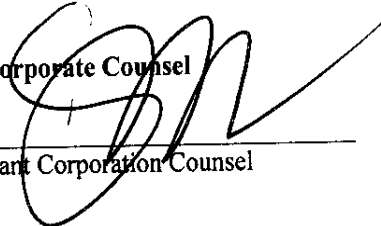
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The undersigned, an Assistant Corporation Counsel, is the authorized agent of the City of Chicago in this transaction.

**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 60607  
(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: 13 - M1 - 403489
	)	
Plaintiff,	)	Address: 8449 South Euclid
	)	
V.	)	Chicago, IL. 60617
	)	
The unknown Heirs and Legatees of Viola Johnson, 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 December 12, 2013, Globetrotters Engineering Corporation was appointed limited receiver for the purpose of vacating the premises.
2. The receiver performed services as detailed in the accounting for fees and expenses from December 12, 2013 through and including September 16, 2014.
3. The receiver's accounting states that in the course of fulfilling its duties it incurred out of pocket costs totaling \$2,030.36 and \$7,193.75 in fees were billed for a combined total of \$9,224.11.
4. After thorough consideration of the Motion and attached exhibits, ~~\$2,030.36~~ in out of pocket costs and ~~\$7,193.75~~ in fees for a total of \$ 9,224.11 is reasonable compensation for work completed.


#### IT IS ORDERED:

- A. Globetrotters Engineering Corporation's costs and fees of \$ 9,224.11 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: September 16, 2014

Entered:

Assoc. Judge Pamela Hughes Gillespie  
SEP 16 2014  
Circuit

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

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

THE CITY OF CHICAGO, a municipal corporation,  
Plaintiff,

v.

THE UNKNOWN HEIRS AND LEGATEES OF VIOLA  
JOHNSON,  
UNKNOWN OWNERS and  
NONRECORD CLAIMANTS,

Defendants.

Case No.

13M 403489

Address: 8449 S EUCLID AVE  
CHICAGO, IL 60617

Amount claimed per day: \$2,000.00

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): 20-36-315-016-0000

LOT 29 (EXCEPT THE SOUTH 1.45 FEET THEREOF) AND THE SOUTH 9.30 FEET OF LOT 30, IN BLOCK 9 OF CONSTANCE, BEING A SUBDIVISION OF THE EAST 1/2 OF THE SOUTHWEST 1/4 OF SECTION 38, TOWN 38, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN.

commonly known as 8449 S EUCLID AVE CHICAGO, IL 60617, (the "subject property") and located thereon is a 1 STORY BUILDING WITH 1 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:

THE UNKNOWN HEIRS AND LEGATEES OF VIOLA JOHNSON, OWNER  
UNKNOWN OWNERS and NONRECORD CLAIMANTS

On DECEMBER 4, 2013, 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)  
NO HEAT
- 2) CN 046013  
Failure to provide adequate heating facilities and allowing usage of portable heating equipment and gas appliances for heat by occupants. (13-196-400)  
OCCUPANTS USING UNAPPROVED HEATING DEVICES.
- 3) CN 104075

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Failure to maintain windows and doors in sound condition and repair and substantially tight so as to completely exclude rain and substantially exclude wind from entering the premises. (13-196-550(f)).

MISSING WINDOWS.

4) CN 100203

Failure to provide hot water at a minimum temperature of 120 degrees Fahrenheit (13-196-420, 13-196-430, 11-8-690, 11-8-500 A)

NO HOT WATER.

That Michael Merchant is the 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 \$2,500.00 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 Michael Merchant, 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.

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.



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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:   
STEVEN 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

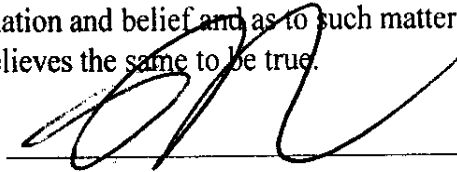
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## CERTIFICATION

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  
Atty No 90909  
(312) 744-8791

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## SERVICE LIST

Re: 8449 S EUCLID AVE CHICAGO, IL 60617

**THE UNKNOWN HEIRS AND LEGATEES OF VIOLA JOHNSON**  
8449 S EUCLID AVE  
CHICAGO, IL 60617

**THE UNKNOWN HEIRS AND LEGATESS OF VIOLA JOHNSON**  
C/O KAWANA L JOHNSON  
11343 S HERMOSA AVE  
CHICAGO, IL 60643

**THE UNKNOWN HEIRS AND LEGATEES OF VIOLA JOHNSON**  
C/O CHARLES A JOHNSON  
11343 S HERMOSA AVE  
CHICAGO, IL 60643

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