

Line #1
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Doc#: 1508941088 Fee: \$46.00
Karen A. Yarbrough
Cook County Recorder of Deeds
Date: 03/30/2015 11:00 AM Pg: 1 of 5

Duplicate of 8122

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

THE CITY OF CHICAGO, a municipal corporation,
Plaintiff

v.

Catherine Kang et al.,
Defendant(s).

No: 14 MI 423395

Re: 4919 S Maplewood

Courtroom 1109, Richard J. Daley Center

ORDER OF JUDGMENT AND ENFORCEMENT WITH SETTLEMENT

This cause coming to be heard by the Court, the Court having heard evidence and testimony and having made a finding of

full compliance substantial compliance subject to reinspection of the violations listed in Plaintiff's Complaint.

IT IS HEREBY ORDERED THAT:

- The judgment entered on 3/3/15 in the amount of \$ 1000.00 plus \$ 60.00 court costs for a total of \$ 1060.00 against Defendant(s) Catherine Kang shall stand as final judgment as to Catherine Kang. Leave to enforce said judgment is stayed until 5/16/15. Execution is to issue on the judgment thereafter.
- Plaintiff agrees to accept \$ 260.00 (including court costs which shall be remitted to the Clerk) in full settlement of the judgment if payment is made to the City of Chicago on or before 5/15/15. If payment is mailed it must be postmarked on or before the above date and sent ATTN: Kimberly Miller, 30 N. LaSalle St., Suite 700, Chicago, IL 60602.
- If this case is dismissed subject to reinspection, Defendant(s) must call the assigned City inspector at (312) 74- within 7 days to arrange for an interior / exterior inspection of the subject premises.
- This order is final and appealable, there being no just cause for delay of its enforcement or appeal.

HEARING DATE: 3/3/15

By: CM
Assistant Corporation Counsel
Mara S. Georges, Corporation Counsel #90909
30 N. LaSalle, Room 700
Chicago, IL 60602 (312) 744-8791

Defendant: Catherine Kang
By Counsel: _____
Phone: (____) _____

[Signature]
Judge McGing / Pireggi Courtroom 1105

Pink Copy for Defendant(s) (photocopy if required)

Yellow Copy for City of Chicago Department of Law

White Original for Court Records

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

THE CITY OF CHICAGO, a municipal corporation,
Plaintiff,

v.

CATHERINE KANG,
JASON KANG,
LAKE FOREST BANK AND TRUST CO.,
UNKNOWN OWNERS and
NONRECORD CLAIMANTS,
Defendants.

Case No. **14M1 403395**

Address: 4919 S MAPLEWOOD AVE
CHICAGO, IL 60632

Amount claimed per day: \$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

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

PIN(s): 19-12-214-044-0000

LOTS 11, 12, 13 AND THE SOUTH 7 FEET OF LOT 14 IN B. F. JACOB'S SUBDIVISION OF THAT PART OF THE NORTH 1/2 OF THE NORTHWEST 1/4 OF THE SOUTHEAST 1/4 OF THE NORTHEAST 1/4 OF SECTION 12/ TOWNSHIP 38 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, LYING SOUTH OF THE RIGHT OF WAY OF THE CHICAGO AND GRAND TRUNK RAILROAD, IN COOK COUNTY, ILLINOIS.

commonly known as 4919 S MAPLEWOOD AVE CHICAGO, IL 60632, (the "subject property") and located thereon is a 2 STORY BUILDING WITH 2 DWELLING UNIT(S) AND 0 NON-RESIDENTIAL UNIT(S).

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

CATHERINE KANG, RECORD OWNER
JASON KANG, RECORD OWNER
LAKE FOREST BANK AND TRUST CO., MORTGAGEE
UNKNOWN OWNERS and NONRECORD CLAIMANTS

3. On OCTOBER 14, 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) CN132046
Provide and maintain every facility, piece of equipment, or utility in safe and sound working condition. (13-196-400, 13-196-440)
SPACE HEATER OUT OF SERVICE AT TIME OF INSPECTIONS. DANGEROUS AND HAZARDOUS.

NOV 18 AM 8:40
CLERK OF THE CIRCUIT COURT
MUNICIPAL DEPARTMENT
CITY OF CHICAGO

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4. That 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.
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 judgment against the defendants, as provided under 13-12-020 of the Municipal Code of Chicago, in the amount of \$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.
- B. 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 defendant's violation(s) of the Municipal Code of Chicago pursuant to Section 1-20-020 of the Municipal Code of Chicago.

COUNT II

6. 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:
7. 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.
8. 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:

- 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 5/11-13-15 and Section 13-12-070 of the Municipal Code of Chicago.
- 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 receivers certificates in accordance with Section 5/11-31-2 of Chapter 65 of the Illinois Compiled Statutes, as amended.
- C. For an order authorizing the plaintiff to demolish, repair, enclose or clean up said premises, if necessary, and a judgment against defendants and a lien on the subject property for these costs in accordance with Section 5/11-31-1 (a) of Chapter 65 of the Illinois Compiled Statutes, as amended.
- D. If appropriate and under proper petition, for an order declaring the property abandoned under Section 5/11-31-1 (d) of Chapter 65 of the Illinois Compiled Statutes as amended and for an order granting City of Chicago a judicial deed to the property if declared abandoned.
- E. If a statutory lien is obtained in this proceeding under Section 5/11-31-1 or 5/11-31-2 of Chapter 65 of the Illinois Compiled Statutes, as amended, for an order permitting foreclosure of said lien in this proceeding.
- F. For reasonable attorney fees and litigation and court costs.

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G. 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

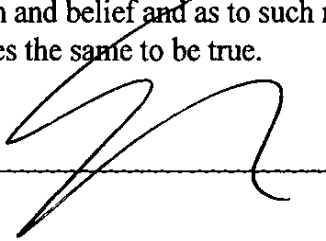
Building and License Enforcement Division
30 North LaSalle Street, Room 700
Chicago, Illinois 60602
(312) 744-8791

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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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