



Doc#: 1516941171 Fee: \$48.00  
Karen A. Yarbrough  
Cook County Recorder of Deeds  
Date: 06/18/2015 03:21 PM Pg: 1 of 6

HEAT

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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. Victoria Alegre  
et al.,  
Defendant(s).

No: 14 MI 403317  
Re: 9140 S Greenwood  
Courtroom 1105, Richard J. Daley Center

ORDER OF PERMANENT INJUNCTION

This cause coming to be heard on the set call, the Court having jurisdiction over the defendant(s) and the subject matter, and being fully advised in the premises and having heard evidence and testimony:

IT IS HEREBY ORDERED THAT:

1. Defendant(s) Victoria Alegre  
his/her/their agents, heirs, successor or assigns, be permanently enjoined and restrained from renting, using, leasing, or occupying the entire premises  
until full compliance with the City of Chicago codes as stated in this cause and further order of court. Defendant(s) shall keep the subject property boarded and secured while it is subject to this injunction.
2. The court reserves jurisdiction of this matter for the purposes of modification, enforcement, or termination of this permanent injunction.
3. This order is final, appealable, and enforceable, the court finding no just cause or reason to delay its enforcement or appeal.
4. Off call

IT IS FURTHER ORDERED THAT this cause be continued to ~~2015-11-13 p.m., Courtroom 1105, Richard J. Daley Center, 50 W. Washington St., Chicago, without further notice.~~

HEARING DATE: 6, 11, 2015

By:   
Assistant Corporation Counsel  
Mark S. Georges, Corporation Counsel #90909  
30 N. LaSalle, Room 700  
Chicago, IL 60602 (312) 744-8791  
FORM HEAT.4004 rev. 11/2008

Judge Anthony J. Simpkins  
Simpkins  
JUN 11 2015  
Circuit Court - 2139

Pink Copy for Defendant(s) (primary)  
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, ILLINOIS MUNICIPAL DEPARTMENT - FIRST DISTRICT

**14 M1 403317**

CITY OF CHICAGO, a municipal corporation,  
Plaintiff  
V.  
VICTORIA ALEGRE  
Unknown owners and non-record claimants  
Defendants

) Case No. \_\_\_\_\_  
) Amount claimed per day 6,500.00  
) Address:  
) 9140 - 9140 S GREENWOOD AVE CHICAGO  
IL 60619-

### COMPLAINT FOR EQUITABLE AND OTHER RELIEF

Plaintiff, City of Chicago, a municipal corporation, by Stephen Patton, Corporate Counsel, by the undersigned Assistant(s) Corporation Counsel, complains of Defendants as follows:

#### Count I

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

25-02-304-037

25-02-304-037-0000

LOT 17 IN BLOCK 7 IN BAIRD AND ROWLAND'S RESUBDIVISION OF BLOCKS 1 TO 8 INCLUSIVE, IN THE CALUMET AND CHICAGO CANAL AND DOCK COMPANY'S SUBDIVISION OF SECTION 2, TOWNSHIP 37 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

Commonly known as

9140 - 9140 S GREENWOOD AVE CHICAGO IL 60619-

and that located thereon is a

1 Story(s) Building

0 Dwelling Units

0 Non-Residential Units

2. That at all times pertinent thereto on information and belief the following named defendants owned, maintained, operated, collected rents for, or had an interest in the said property on the date(s) herein set forth.

VICTORIA ALEGRE , OWNER

Unknown owners and non-record claimants

3. That on 09/09/2014 and on each succeeding day thereafter and on numerous other occasions, the defendant(s) failed to comply with the Municipal Code of City of Chicago as follows:

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1 PL155017

Provide kitchen sink, bathroom sink, and/or bath tub or shower with cold water supply line, installed and connected. (13-196-420)

Single family home without water.

Location: OTHER : :Provide water to dwelling

SEQ #: 001

2 CN197019

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 stairwell, and within 15 feet of every sleeping room. Be sure the detector is at least 4 inches from the wall, 4 to 12 inches from the ceiling, and not above door or window.

Replace all defective or missing smoke detectors at all floors on 1st, 2nd and basement.

Location: OTHER : :Smoke Detectors

SEQ #: 002

3 CN197087

Install carbon monoxide detector within 40 feet of every sleeping room in residential structure. (13-64-190, 13-64-210) A carbon monoxide detector is needed whenever there is a heating appliance on the premises that burns fossil fuel such as gas, oil, or coal, or air that is circulated through a heat exchanger. Install according to manufacturer instructions. A hard wired model requires an electrical wiring permit. In a single family residence, be sure the detector is on or below the lowest floor with a place to sleep. In a multiple dwelling residence heated by a boiler, install a detector in the same room as the boiler. Otherwise, each apartment follows single family guidelines. The owner is responsible for installation and written instructions, the tenant for testing, maintenance, and batteries.

1st floor missing carbon monoxide detector. Replace defective or missing carbon monoxide detectors in basement.

Location: OTHER : :Carbon Monoxide Detectors

SEQ #: 003

4 CN104015

Replace broken, missing or defective window panes. (13-196-550 A)

West elevation; rear window broken.

Location: OTHER : :Broken window

SEQ #: 004

5 CN105015

Repair or replace defective door. (13-196-550)

All interior doors are damaged and hanging off door hinges. Remove key operated cylinder locks and knobs from all interior doors.

Location: OTHER : :interior doors

SEQ #: 005

6 CN103015

Failed to maintain floor free from holes and wide cracks and free from loose, warped, protruding or rotting floor boards. (13-196-540(a) and (b))

Exposed subflooring throughout 1st floor, nail heads sticking out of flooring. Bathroom tiles broken and missing.

Location: OTHER : :1st floor flooring

SEQ #: 006

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- 7 CN074014  
Failed to maintain exterior service walks, passage and areaways in clean, sanitary and safe condition. (13-196-630, 13-196-641)  
East elevation; front concrete walkway in front of stairs is missing a 4' foot x 4' foot section of concrete walkway. Dangerous and hazardous section missing is approximately 5 foot deep and is insufficiently covered with building materials.  
Location: OTHER : :Concrete Walkway SEQ #: 007
- 8 CN106015  
Failed to maintain interior stairway system in safe condition and sound repair. (13-196-570)  
West elevation: Rear 2nd level wide interior stairs is missing an additional handrail.  
Location: OTHER : :Handrail required SEQ #: 008
- 9 CN138056  
Remove accumulation of refuse and debris and keep premises clean. (13-196-580, 13-196-630)  
Front and rear yard space has accumulation of junk and demo debris.  
Location: OTHER : :Junk and Debris SEQ #: 009
- 10 CN041063  
Failed to cut or remove weeds, grass or other growth that present a fire hazard. (15-4-970)  
Front and rear yard space; Over grown grass and weeds.  
Location: OTHER : :High weeds SEQ #: 010
- 11 NC2020  
Failed to obtain building permit for erecting, enlarging, altering, repairing, removing or demolishing a building or part of a building. (13-12-050, 13-32-010, 13-32-130)  
West elevation rear yard; No permit on file for iron fence erected over 5 foot.  
Location: OTHER : :Iron fence SEQ #: 011
- 12 EL0038  
Repair opening or gap between electrical outlet box and finished wall or ceiling. (18-27-370.21)  
Throughout home; light switches and outlets cover plates missing/broken.  
Location: OTHER : :Replace all missing/broken electrical covers SEQ #: 012
- 13 PL154027  
Supply adequate hot water with minimum temperature of 120 degrees F. (13-196-430)  
Single family home without hotwater.  
Location: OTHER : :Provide hot water to dwelling SEQ #: 013

\*\*\* End of Violations \*\*\*

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

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 for a fine against the defendants, as provided under 13-12-020 of the Municipal Code of Chicago, in the amount indicated on the heading of the Complaint for each day said violations have existed and/or exist, said fine computed in accordance with Section 13-12-040 of the Municipal Code of Chicago.

## Count II

Plaintiff, City of Chicago, a municipal corporation, realleges the allegations of paragraphs one through five of Count I as paragraphs one through five of Count II and further alleges:

6. That the levying of a fine is not an adequate remedy to secure the abatement of the aforesaid municipal code violations and the public nuisance which they constitute, and that it is necessary that a temporary and permanent injunction issue and, if necessary, that a receiver be appointed, to bring the subject property into compliance with the Municipal Code of Chicago.

7. That Felicia Davis, the Commissioner of the Department of Buildings, City of Chicago, has determined said building does not comply with the minimum standards of health and safety set forth in the Building Code.

### WHEREFORE, PLAINTIFF PRAYS:

- a. For a temporary and permanent injunction requiring the defendants to correct the violations alleged in the complaint and to restrain future violations permanently, pursuant to 65 ILCS 5/11-31-1 (a), 5/11-31-2 and 5/11-13-15 and 13-12-070 of the Municipal Code.
- b. For the appointment of receiver, if necessary, to correct the conditions alleged in the Complaint with the full powers of receivership including the right to issue and sell 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.
- g. For such other and further relief as may be necessary in the premises and which the court shall deem necessary.

CITY OF CHICAGO, a municipal corporation

By: \_\_\_\_\_

ASSISTANT CORPORATION COUNSEL

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## VERIFICATION

The undersigned, being first duly sworn on oath, deposes and says that he/she is the duly authorized agent of the plaintiff for the purpose of making this affidavit; that he/she has read the above and forgoing complaint, and has knowledge of the contents thereof, and that matters set out therein are true in substance and in fact, and as to matters alleged on information and belief that he/she believes them to be true.

Subscribed and sworn to before me this \_\_\_\_\_ Day  
of \_\_\_\_\_ 20\_\_\_\_.

By: \_\_\_\_\_

\_\_\_\_\_  
Deputy Circuit Court Clerk or Notary Public

For further information Contact: Department of Buildings  
Public Information Desk (312) 744 3400

**Stephen Patton**  
Corporation Counsel  
Attorney for Plaintiff

By: \_\_\_\_\_

Assistant Corporation Counsel  
30 N LaSalle St. 7th floor  
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