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1732549098

Lis Pendens Notice

(Rev. 2/09/04)
CCG N066

Doc# 1732549098 Fee \$46.00

RHSP FEE:\$9.00 RPRF FEE: \$1.00

KAREN A. YARBROUGH

COOK COUNTY RECORDER OF DEEDS

DATE: 11/21/2017 02:53 PM PG: 1 OF 5

IN THE CIRCUIT COURT OF
COOK COUNTY, ILLINOIS

Christopher Pawlowicz

Plaintiff

v.

The Spirit of Chicago Foundation and Mark A. Condic

Defendant

No. 17L0063131

LIS PENDENS NOTICE

I, the undersigned, do hereby certify that the above entitled cause was filed in the Circuit Court of Cook County on the

21 day of November, 2017 and is now pending in the Court and that the

property affected by the cause is described as follows:

9666 BEDFORD CIR, DES PLAINES, IL
PIN 09-09-401-072-0000

in Cook County, Illinois.

Atty. No.: Pro Se

Name: Christopher Pawlowicz

Atty. for: Christopher Pawlowicz

Address: 411 Fitch Rd

City/State/Zip: Rockford, IL, 61109

Telephone: 847 207 9810

2017 NOV 20 PM
FILED
CIRCUIT COURT
CLERK'S OFFICE

UNOFFICIAL COPY

COOK COUNTY
RECORDER OF DEEDS

Property of Cook County Clerk's Office

COOK COUNTY
RECORDER OF DEEDS

COOK COUNTY
RECORDER OF DEEDS

This certificate is filed for the purpose of recording the same in the public records of Cook County, Illinois, and the same shall be subject to the provisions of the Illinois Landmark Act, Public Act 09-001, as amended.

I HEREBY CERTIFY THE ABOVE TO BE CORRECT.
DATE **DEBORAH BROWN** NOV 21 2017
CLERK OF THE COUNTY OF COOK, ILL.



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Complaint - Verified

(06/02/17) CCM 0008 A

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

~~COUNTY~~ MUNICIPAL DEPARTMENT, THIRD MUNICIPAL DISTRICT

17L 0063131

Christopher Pawlowicz

Plaintiff(s)

Case No. _____

Contract: _____

v.

The Sprit of Chicago Foundation and

Defendant(s)

Amount Claimed: 767.000

Return Date: 12.29.2017

COMPLAINT

The Plaintiff(s) claim(s) as follows (use next page if more space is required.):

VERIFIED COMPLAINT FOR BRACH OF CONTRACT, UNJUST ENRICHMENT, QUANTUM MERUIT, TORTIOUS INTERFERENCE AND NEGLIGENCE

COMMON FACTS

At all relevant times, the PLAINTIFF Christopher Pawlowicz, resided in the County of Cook, State of Illinois. At all relevant times, the DEFENDANTS The Sprit of Chicago Foundation and Mark A. Condie resided in the City of Chicago, County of Cook, State of Illinois.

ALLEGATIONS

PLANTIFF and DEFENDANTS have known each other for almost thirty years. Within that time period and specifically about and after year 1999 DEFENDANTS have made several commitments to and verbal contracts with PLANTIFF that involved money payments from different enterprises and properties. In the last two years or so the previously mainly civil relationship deteriorated and DEFENDANTS increasingly renegaded on their commitments. DEFENDANTS breached verbal contracts regarding following commitments, amounts and properties.

I, Christopher Pawlowicz, certify that I am the _____
(Name) (Name of Attorney if applicable)

plaintiff in the above entitled action. The allegations in this complaint are true.

Atty. No.: _____ Pro Se 99500

Dated: 11/21/2017

Atty Name: Christopher Pawlowicz

[Signature]
Signature

Atty. for: _____

Address: 411 Fitch Rd

City: Rockford State: IL

Zip: 61109

Telephone: 847 207 9810

Under penalties as provided by law pursuant to 735 ILCS 5/1-109 the abovesigned certifies that the statements set forth herein are true and correct.

Primary Email: cpx1959@yahoo.com

Secondary Email: _____

Tertiary Email: _____

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

FILED
2017 NOV 21 PM 1:01
CLERK OF THE CIRCUIT COURT
THIRD DISTRICT

UNOFFICIAL COPY

Complaint - Verified

(06/02/17) CCM 0008 B

Claims - continued

9666 Reding Circle, Des Plaines, IL PIN 09-09-401-072-0000 approx. \$120,000.00
9 Roundstone Lane, Barrington Hills, IL PIN 01-07-300-027-0000 approx. \$100,000.00
2728 S. Wells St, Chicago, IL PIN 17-28-413-030-0000 approx. \$47,000.00
2379 Oak Tree Lane, Park Ridge, IL PIN 09-22-116-005-0000 approx. \$200,000.00

PLANTIFF participated in construction, development, marketing, enhancement etc. of above properties between 1999 and present and DEFENDANTS made verbal contracts to reimburse PLANTIFF above amounts at all times thereafter. DEFENDANTS breached verbal contracts in respect to the above properties around May 2015 when he refused to reimburse PLANTIFF. PLANTIFF is seeking full reimbursement of all above amounts in the aggregate of \$467,000.00 based on breach of contract, unjust enrichment and quantum meruit.

Further on August 4th, 2015 DEFENDANTS filed complaint in the Circuit Court of Cook County seeking possession of the premises located at 9 Roundstone Lane, Barrington Hills, one of above mentioned properties. The complaint resulted in PLANTIFF being evicted from the subject property on March 30th, 2016. The agreement was that PLANTIFF would occupy the property while DEFENDANTS would try to sell it for mutual benefit. DEFENDANTS breached the contract and evicted PLANTIFF. Further after eviction DEFENDANTS intentionally and illegally withheld most of PLANTIFF private possessions for over 4 months on 8/8/2016, some of them for over six months on 10/25/2016, some still are remaining in his possession and business possessions for more than 12 months. DEFENDANTS caused undue burden on PLANTIFF especially negatively interfering with PLANTIFF ability to conduct his business and earn living. PLANTIFF is seeking full reimbursement for monetary damages caused by DEFENDANTS and loss of income in the aggregate of \$250,000.00 based on tortious interference with business as well as punitive damages in the amount to be determined by court.

In addition, DEFENDANTS refused to allow PLANTIFF to retrieve 3 cats that were remaining in the residence without sufficient food and care for long period of time. Especially one last cat remained in the residence for over 2 months and after DEFENDANTS captured the cat he intentionally relocated her to his warehouse where he kept her without food and water for undetermined period of time. When he finally allowed PLANTIFF to retrieve the cat he forced PLANTIFF to transfer the cat from his cage to a carrier in the open outdoor environment which scared the animal and caused severe damage to PLANTIFF arm. PLANTIFF had to seek medical help and incurred costs, physical and psychological damages. PLANTIFF is seeking reimbursement for his damages as well the damages related to animal neglect and cruelty in the amount of \$50,000.00 as well as punitive damages in the amount to be determined by court.

PLANTIFF is asking the court to enter ruling in his favor.

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LEGAL DESCRIPTION TO TRUSTEE'S QUIT CLAIM DEED

Property Address: 9666 Reding Circle, Des Plaines, Illinois

PIN: 09-09-401-072

PARCEL 1: THAT PART OF LOT 1 IN LAKE MARY ANNE SUBDIVISION OF PART OF SECTIONS 9 AND 10, TOWNSHIP 41 NORTH, RANGE 12, EAST OF THE THIRD PRINCIPAL MERIDIAN, BOUNDED AND DESCRIBED AS FOLLOWS: BEGINNING AT A POINT IN THE WEST LINE OF LOT 1 AFORESAID 562.53 FEET NORTHWESTERLY OF THE MOST WESTERLY SOUTHWEST CORNER THEREOF; THENCE NORTH 86 DEGREES, 41 MINUTES, 19 SECONDS EAST AT RIGHT ANGLES THERETO 115.0 FEET; THENCE NORTH 30 DEGREES, 21 MINUTES, 06 SECONDS EAST 237.09 FEET TO A LINE DRAWN NORTH 69 DEGREES, 15 MINUTES, 57 SECONDS EAST THROUGH A POINT IN THE WEST LINE OF LOT 1 AFORESAID 682.53 FEET NORTHWESTERLY OF THE MOST WESTERLY SOUTHWEST CORNER THEREOF; THENCE SOUTH 69 DEGREES, 15 MINUTES, 57 SECONDS WEST 258.27 FEET TO SAID POINT IN SAID WEST LINE; THENCE SOUTH 03 DEGREES, 18 MINUTES, 41 SECONDS EAST ALONG SAID WEST LINE 120.0 FEET, TO THE POINT OF BEGINNING, IN COOK COUNTY, ILLINOIS.

PARCEL 2: EASEMENTS APPURTENANT TO AND FOR THE BENEFIT OF PARCEL 1 AS SET FORTH AND DEFINED IN THE DECLARATION OF EASEMENTS RECORDED AS DOCUMENT NO. 20016197 AND AS AMENDED BY INSTRUMENT RECORDED JANUARY 21, 1969 AS DOCUMENT NO. 20734489 FOR INGRESS AND EGRESS, ALL IN COOK COUNTY, ILLINOIS.

Cook County Clerk's Office