

UNOFFICIAL COPY

a. PIN: 13-20-227-019-0000

b. LEGAL DESCRIPTION:

THE WEST 1/2 OF LOT 130 IN KOSTNER AND ZANDER'S ADDITION TO WEST IRVING PARK, A SUBDIVISION OF THE SOUTH 1/2 OF THE NORTHEAST 1/4 OF SECTION 20, TOWNSHIP 40 NORTH, RANGE 13, EAST OF THE THIRD MERIDIAN, IN COOK COUNTY, IL.

This parcel is commonly known as **5640 W. Patterson Ave Chicago, IL 60634** ("subject property").

4. On information and belief, the dwelling located on the subject property was recently demolished but the foundation is still present.
5. That at all times pertinent thereto on information and belief the following named Defendants owned, managed, controlled, collected rents from, had a legal or equitable interest in, or contributed to the ongoing violations at, the Subject Property:
 - a. The current owners of 5640 W. Patterson Ave are Irvin Daniel Carreto-Tellez and Zuri Shad Haid Carreto-Tellez as joint tenants.
 - b. The mortgagee(s) are Loandepot.com, LLC D/B/A Mortgage Master National and Mortgage Electronic Registration Systems, Inc., A/N/F Loandepot.com LLC.
 - c. The last taxpayer of record is Zari Shad Haid Carreto-Tellez.
 - d. Unknown owners and non-record claimants.
6. That Judy Frydland 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.

Building Code Violations

7. That on 12/24/2018 and on each succeeding day thereafter and on numerous other occasions, the defendant(s) failed to comply with the Municipal Code of the City of Chicago as follows:

NC1110

1. Performed or allowed demolition work on a building or part of a building or structure

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

CITY OF CHICAGO,
a municipal corporation,
Plaintiff,
v.

IRVIN DANIEL CARRETO-TELLEZ; ZURI
SHAD HAD CARRETO- TELLEZ;
LOANDEPOT.COM, LLC D/B/A MORTGAGE
MASTER NATIONAL; MORTGAGE
ELECTRONIC REGISTRATION SYSTEMS,
INC., A/N/F LOANDEPOT.COM LLC; AND
UNKNOWN OWNERS AND NON-RECORD
CLAIMANTS,
Defendants.

No. 1901400354

Re: 5640 W Patterson Ave,
Chicago, IL 60634

Amount Claimed: \$4,000 (+)

Courtroom: 1105

COMPLAINT FOR EQUITABLE AND OTHER RELIEF

Plaintiff City of Chicago ("City"), by its attorney, Edward Siskel, Corporation Counsel, complains of the Defendants as follows:

GENERAL ALLEGATIONS

Nature of the Case

1. The City brings this action pursuant to its police power as a home rule unit under Article VII of the Illinois Constitution, which includes "the power to regulate for the protection of the public health, safety, morals and welfare." Ill. Const. art. VII, par. 6(a). As a further grant of authority, the City brings this action pursuant to the Unsafe Property Statute 65 ILCS 5/11-31-1(a) et seq. (2004), as amended, the Injunction Statute for Building and Zoning Violations, 65 ILCS 5/11-13-15 (2005) and Chicago Municipal Code ("Code"). By bringing this action, the City seeks to abate the dangerous and unsafe conditions at the property in question and obtain equitable relief, civil penalties, attorney's fees and costs.

The Parties and the Property at Issue

2. The City is a municipal corporation organized and existing under the laws of the State of Illinois.
3. Within the corporate limits of Chicago, there is a parcel of real estate legally described as: