



Doc# 2209828032 Fee \$88.00

KAREN A. YARBROUGH
COOK COUNTY CLERK

DATE: 04/08/2022 01:11 PM PG: 1 OF 13

This space reserved for the Recorder of Deeds

Dup. Orig

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

THE CITY OF CHICAGO, a municipal corporation,
Plaintiff,
v.
Chicago Title
et al.,
Defendant(s).

No: 20 MI 400077
Re: 3036-38 N Lawndale
Courtroom 11 03, Richard J. Daley Center

ORDER OF PERMANENT INJUNCTION

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

IT IS HEREBY ORDERED THAT:

- 1. Defendant(s) Renee + Scott Lynn and his / her / their / its agents, heirs, legatees, successors, and assigns shall be permanently enjoined and restrained from renting, using, leasing, or occupying the: subject premises until the same have established full compliance with the Municipal Code of the City of Chicago as stated in this cause and further order of court. Defendant(s) and his / her / their / its agents, heirs, legatees, successors, and assigns shall maintain the subject property in a sanitary, boarded, and secure condition while it remains subject to this injunction.
- 2. The court reserves jurisdiction of this matter for the purposes of modification, enforcement, or termination of this injunction.

The above-named Defendant(s) and his / her / their / its agents, heirs, legatees, successors, and assigns shall put and keep the subject property in compliance with the vacant building requirements in the Municipal Code of Chicago (sections 13-12-125 through 13-12-150), including the requirements that the property be insured and registered with the City (information at www.cityofchicago.org/buildings) and keep the exterior of the premises clean and free of debris and weeds.

Case dismissed + off call.

S Y
P 13
S N
SC 1
INTP

~~Pursuant to Ill. S.Ct. Rule 304(a), this order is final and appealable, there being no just reason for delaying enforcement or appeal.~~

HEARING DATE: 3/14/22

By: [Signature]
Attorney for Plaintiff
Corporation Counsel #90909
30 N. LaSalle, Room 700
Chicago, IL 60602 (312) 744-8791

[Signature] 4/1/2022
Circuit Court, 1214
Judge [Signature] Courtroom 11 05

#H10 1/2

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, ILLINOIS MUNICIPAL DEPARTMENT - FIRST DISTRICT

The City of Chicago, a municipal corporation)

Plaintiff,)

vs.)

CHICAGO TITLE, RENEE LYNN, and all unknown)
owners and non-record claimants, et al.,)

Defendant(s).)

Case No: 20 M1 400077

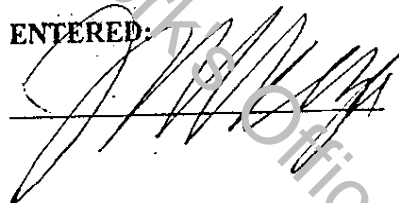
Re: 3036 North Lincoln Ave
Chicago, Illinois 60657

ORDER

THIS MATTER COMING before this Court on the Motion of the Limited Receiver Chicago Neighborhood Recourse's LLC (the "CNR") for Approval of Receivers Accounting and for Approval of Receiver's Certificate Form (the "Motion"), parties to this action having received notice of this motion and this Court being advised in the premises, IT IS HEREBY ORDERED:

1. The Motion is hereby GRANTED.
2. CNR is hereby authorized to issue Receiver's Certificate #1 in the face amount of \$58,435.47 on the form attached herein as Exhibit G

ENTERED:



Prepared by:
Chicago Neighborhood Resources, LLC
2870 N Elston
Chicago, IL 60618
(773)717-2277

RECEIVED BY THE CLERK OF THE COURT

MAR 3 2021

Circuit Court-1014

FILED DATE: 1/31/2022 1:09 PM 20201400077

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

20M1-400077

CITY OF CHICAGO, a municipal corporation,)	Case No.	_____
Plaintiff)	Amount claimed per day	\$ 31,500
V.)	Address:	
CHICAGO TITLE LAND TRUST CO., A/T/U/T #4674, DTD 7/1/94)	3036 - 3038 N LINCOLN AVE CHICAGO	
RENEE LYNN)	IL 60657-	
SCOTT LYNN)		
BRICKYARD BANK)		
Unknown owners and non-record claimants)		
Defendants)		

FIRST AMENDED

COMPLAINT FOR EQUITABLE AND OTHER RELIEF

Plaintiff, City of Chicago, a municipal corporation, by Celia Meza, 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:

14-29-113-026-0000

LOT 12 AND 13 IN PETER OTT'S SUBDIVISION OF BLOCK 13 IN WILLIAM LILL AND HEIRS OF MICHAEL DIVERSEY'S SUBDIVISION OF THE SOUTHWEST 1/2 OF THE NORTHWEST 1/4 OF SECTION 29, TOWNSHIP 40 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY ILLINOIS

Commonly known as

3036 - 3038 N LINCOLN AVE CHICAGO IL 60657-

and that located thereon is a

4 Story(s) Building

0 Dwelling Units

1 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.

CHICAGO TITLE LAND TRUST CO., A/T/U/T #4674, DTD 7/1/94 , OWNER

RENEE LYNN , TRUST BENEFICIARY

SCOTT LYNN , TRUST BENEFICIARY

BRICKYARD BANK , MORTGAGE HOLDER

Unknown owners and non-record claimants

Accepted for Filing by Clerk
AUG 09 2021
Circuit Court - 1007

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3a. That on 07/17/2019 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:

- 1 CN061014
Failed to maintain the exterior walls of a building or structure free from holes, breaks, loose or rotting boards or timbers and any other conditions which might admit rain or dampness to the walls. (13-196-530(b), 13-196-641)
South, West and North elevations/ exterior masonry walls - washed out mortar, fractures, spalling and missing bricks.
East elevation/ exterior stone work - washed out mortar.
Permit required for all masonry repairs.
Location: OTHER : :OTHER SEQ #: 001
- 2 CN062024
Failed to maintain parapet wall in good repair and free from cracks and defects. (13-196-530 and 13-196-641)
North, South and West elevations/ Parapet walls - Washed out mortar and spalling bricks.
West parapet starting to lean inward and outward.
Permit required for all masonry repairs.
Location: OTHER : :OTHER SEQ #: 002
- 3 CN062034
Failed to maintain roof coping in good repair and free from cracks defects. (13-196-530, 13-196-530(c) and 13-196-641)
West elevation/ coping files - missing.
Permit required for all masonry repairs.
Location: OTHER : :OTHER SEQ #: 003
- 4 CN065034
Failed to maintain window sill in good repair and free from cracks and defects. (13-196-530 (e), 13-196-550, 13-196-641)
East elevation/ stone sills - Washed out mortar.
Permit required for all masonry repairs.
Location: OTHER : :OTHER SEQ #: 004
- 5 CN101015
Failed to maintain interior walls and ceilings free from holes or cracks. (13-19-540(c))
1st through 4th floor common areas/ walls and ceilings - Missing drywall, holes and cracks.
1st floor hallway/ interior masonry walls - Washed out mortar, spalling bricks and built up efflorescence.
Permit required for all masonry repairs.
Location: OTHER : :OTHER 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))
First floor hallway/ wood floor - worn, cracked and missing sections.
Location: OTHER : :OTHER SEQ #: 006
- 7 CN073044
Failed to maintain exterior door hardware in good condition and repair. (13-196-550(d), 13-196-641)
Building Front entry/ Door - closure out of service. Door lock broken.
Location: OTHER : :OTHER SEQ #: 007

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8 CN073024

Failed to maintain exterior door frames to exclude rain and wind from entering building and otherwise in sound condition and repair. (13-196-550, 13-196-550(f), 13-196-641)

Building Front entry door/ Door frame - door hitting frame and will not close.

Location: OTHER : :OTHER

SEQ #: 008

9 CN106015

Failed to maintain interior stairway system in safe condition and sound repair. (13-196-570)

Building 1st to 4th floors/ hand rails - loose and pulling with missing pickets.

Location: OTHER : :OTHER

SEQ #: 009

10 CN141016

Stop noxious odors from permeating dwelling or premises. (7-28-060, 13-196-630)

Building 1st floor hallway - Foul odor through out hallway.

Location: OTHER : :OTHER

SEQ #: 010

11 CN105055

Failed to install door viewing device at the entrance door of a dwelling unit. (13-164-030)

Building 1st to 4th floors/ doors - missing viewing device.

Location: OTHER : :OTHER

SEQ #: 011

12 CN138056

Remove accumulation of refuse and debris and keep premises clean. (13-196-580, 13-196-630)

South elevation - garbage, large sections of cardboard, bottles, cans, discarded carpet and wood.

Location: OTHER : :OTHER

SEQ #: 012

13 CN134016

Rid premises of rodents and seal rodent holes. (13-196-530 D, 13-196-540 A, 13-196-630 C)

South elevation - Rats observed.

Location: OTHER : :OTHER

SEQ #: 013

3b. That on 04/07/2021 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:

14 CN065034

Failed to maintain windowsill in good repair and free from cracks and defects in violation of §§13-196-530(e), 13-196-550, 13-196-641 of the Code.

Exterior wall/façade protruding outward various locations at North elevation at windowsills for 2nd, 3rd, and 4th floors.

Location: OTHER : :OTHER

SEQ:# 014

15 CN065024

Failed to maintain projection from wall of building in good repair and free from cracks and defects in violation of §§13-196-530(e), 13-196-641 of the Code.

Failing to maintain projections/signage from front of building, north elevation. Currently large metal fabricated sign above main entrance appears to be causing stress to building façade. Immediate remedies required.

Location: OTHER : :OTHER

SEQ:# 015

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16 CN060002

Immediately provide sidewalk shed for protection of property and passersby from unsafe conditions, as follows: pursuant to §§13-12-130, 13-20-040, 13-196-037(a) of the Code.

Obtain proper scaffolding system over public walkway to ensure safety of possible over-head falling building construction materials.

Location: OTHER :: OTHER SEQ:# 016

17 CN101015

Failed to maintain interior walls and ceilings free from holes or cracks in violation of §13-19-540(c) of the Code.

Ceilings throughout property multiple locations 1st floor commercial space, 2nd, 3rd, and 4th floors various areas water damaged and missing sections. Repairs required.

Location: OTHER :: OTHER SEQ:# 017

18 CN103015

Failed to maintain floor free from holes and wide cracks and free from loose, warped, protruding or rotting floorboards in violation of §§13-195-540(a) and (b) of the Code.

Floors throughout loose warped and missing sections throughout 1st, 2nd, 3rd, and 4th floors throughout doc area has cut out section near loading areas, repairs required.

Location: OTHER :: OTHER SEQ:# 018

19 CN031023

Failed to maintain properly charged fire extinguisher, and to attach tag which clearly indicates recharge date and signature of the person who performed the recharge, in violation of §15-16-680 of the Code.

Expired fire extinguishers throughout, ensure all fire extinguishers are tagged and hung throughout.

Location: OTHER :: OTHER SEQ:# 019

20 CN106015

Failed to maintain interior stairway system in safe condition and sound repair in violation of §13-196-570 of the Code.

Stairs located at rear of building doc area missing handrail.

Location: OTHER :: OTHER SEQ:# 020

21 CN194019

Repair or replace.

Doc area located at the rear of property missing sections of fire resistant material due to plumbing pipe installations. All areas where missing drywall shall be repaired with proper fire-resistant materials throughout property (13-160-220).

Location: OTHER :: OTHER SEQ:# 021

22 CN044013

Failed to fill openings around exposed pipes or power shafting with approved noncombustible materials in violation of §15-8-640 of the Code

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Pipe penetrations throughout basement areas and where necessary throughout property shall be sealed with proper fire-resistant material.

Location: OTHER :: OTHER SEQ:# 022

23 CN103035

Repair or replace defective structural member pursuant to §13-196-530 A of the Code.

Repairs required structural members throughout property currently steel beams and posts located within basement areas rusted repairs required.

Location: OTHER :: OTHER SEQ:# 023

24 CN061054

Restore roof live load to original use by removing additional weights or structures attached to trusses, or submit structural engineering report prepared, signed, and sealed by licensed architect or registered structural engineer, as to structural safety of roof trusses pursuant to §§13-52-220, 13-52-230, 13-52-240, 13-120-130, 13-196-130 of the Code.

Obtain exterior wall engineers reports for all necessary repairs to be performed at exterior façade for front of property. (2). Also include in engineers report for rear of property fire escape, confirming its current conditions are in safe and proper working manners.

Location: OTHER :: OTHER SEQ:# 024

25 NC4032

Failed to enclose interior stairwell in building over three stories by partitions with at least two hour fire resistance in violation of §15-8-140 of the Code.

2-hour enclosure required for hallways leading to studios and residential spaces for 2nd, 3rd, and 4th floors, for all buildings over 3 stories.

Location: OTHER :: OTHER SEQ:# 025

26 NC5012

Failed to provide stairwell opening with self-closing, framed, 1-1/2-hour Class B door in violation of §15-8-180 of the Code.

Class B Fire Doors required for all entrances to 2nd, 3rd, and 4th floors entrances. Currently present doors non-labeled and unable to determine any fire ratings.

Location: OTHER :: OTHER SEQ:# 026

27 CN067014

Failed to maintain roof in sound condition, sound repair, watertight, and free from defects in violation of §§13-196-530, 13-196-530(c) and 13-196-641 of the Code.

Severe roof damages occurring at property, currently roof displaying mass amounts of water infiltrations visible from 4th floor ceilings. Immediate repairs required.

Location: OTHER :: OTHER SEQ:# 027

28 NC3042

Failed to provide and maintain uninterrupted means of egress to outside exit at grade level in violation of §§13-160-070, 13-160-100, 13-196-080 of the Code.

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Doors leading to fire escape marked exit does not open to full 90 degrees. (Dangerous and hazardous.)

Location: OTHER : : OTHER SEQ:# 028
29 CN061044

Repair fire damage so building complies with code requirements at time of construction or alteration pursuant to §13-196-010 of the Code.

Structural members located at 2nd floor heavy timber columns charred and showing signs of fire damages.

Location: OTHER : : OTHER SEQ:# 029
30 NC2011

Performed or allowed work to be performed without submitting plans prepared, signed and sealed by a licensed architect or registered structural engineer for approval and without obtaining a permit to perform the work in violation of §§13-32-010, 13-32-040, 13-40-020, 13-12-050 of the Code.

Full plans and permits required for entire property and its current conditions. Currently approximately 9 rooms used as a sleeping quarters at 4th floor, 6 rooms at 3rd floor, 8 rooms at 2nd floor with bathrooms and kitchens at all upper levels. Obtain plans to legalize the use of this property for which it currently stands. Also ensure that plans include all stages constructed at property that are use for performances are properly constructed to fit today's code requirements.

Location: OTHER : : OTHER SEQ:# 030
31 PL157027

Repair or replace defective waste pipe pursuant to § 8-23-102.3 of the Code.

Sanitary waste stack at 1st floor rear leaking sewage onto 1st floor. DANGEROUS AND HAZARDOUS.

Location: OTHER : : OTHER SEQ:# 031
32 PL152017

Provide trap for plumbing fixture pursuant to §18-29-1002 of the Code.

Condensate line serving furnaces at first floor directly connected to sanitary stack with no trap. DANGEROUS AND HAZARDOUS SEWER GAS.

Location: OTHER : : OTHER SEQ:# 032
33 PL194029

Provide.

Ejector pump lid missing at basement pump room. (18-29-12.3.2) DANGEROUS AND HAZARDOUS.

Location: OTHER : : OTHER SEQ:# 033
34 PL164057

Repair catch basin pursuant to §§18-29-102.3, 18-29-1003.1 through 1003.4 of the Code.

Manhole cover at basement cracked missing about 1/4th of lid. DANGEROUS AND HAZARDOUS.

Location: OTHER : : OTHER SEQ:# 034

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35 PL232010

Submit plans to Building, Water, and Sewer Depts for approval and permit before constructing, altering, or using plumbing system pursuant to §§13-12-080, 13-32-010 of the Code.

Submit plans for alterations made to entire plumbing system without plans or permits. New kitchen and bathroom water drain waste and vent piping installed without plans or permits.

Location: OTHER :: OTHER SEQ:# 035

36 PL239010

Engage licensed and bonded plumbing contractor to install plumbing pursuant to §18-29-106.1 of the Code.

Engage licensed and bonded plumbing contractor to install plumbing.

Location: OTHER :: OTHER SEQ:# 036

37 ELR1801

Provide a minimum of two small appliance circuits in kitchen [18-27-210.11, 18-27-560.6b].

Main 400 amp 1 phase service- Service entrance raceway mogul fittings damaged and uncovered at basement. Unapproved through installed on service entrance raceway at basement. Service entrance conductors visible at open trough and mogul possibly damaged. Grounding electrode conductor installed in unapproved trough enclosing service entrance conductors. Main service disconnects open at side. Main service disconnects corroded at bottom interior from water/oil infiltration. All electrical services must be installed in approved manner. Dangerous and hazardous.

Location: OTHER :: OTHER SEQ:# 037

38 ELR1801

Provide a minimum of two small appliance circuits in kitchen [18-27-210.11, 18-27-560.6b].

100 amp 3 phase service- Service has open meter enclosure. Service entrance conductors appear to be over 5' from point of entry before main disconnect. All electrical services must be installed in approved manner. Dangerous and hazardous.

Location: OTHER :: OTHER SEQ:# 038

39 ELR1805

Installers of additional loads to a previously approved service shall be responsible for the adequacy of that service [18-27-110.12f].

Fused distribution panel at basement commercial space damaged with exposed live parts, missing interior mats. Fused distribution panel at apartment stair hall has exposed live parts, missing interior mats. All distribution equipment must be in approved condition and replaced where required. Dangerous and hazardous.

Location: OTHER :: OTHER SEQ:# 039

40 ELR1884

Provide one line diagram and load calculation for electrical service and all feeders (14E-2-215.5, 14E-2-220.40).

Location: OTHER :: OTHER SEQ:# 040

41 ELR1823

Install cover on outlet or junction box. (14E-3-314.25)

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Open boxes various areas throughout basement, 1st floor, 2nd floor, 3rd floor, 4th floor. Numerous panels used as junction boxes are open at various locations at interior stairs. Close open boxes where required throughout premises. Dangerous and hazardous.

Location: OTHER : : OTHER SEQ:# 041

42 EL1826

Install system II emergency lighting. (14E-7-700.6, 14E-7-700.21)

Install approved operable type II emergency lighting system at 1st floor/basement commercial space and where required throughout premises.

Location: OTHER : : OTHER SEQ:# 042

43 EL1826

Install system II emergency lighting. (14E-7-700.6, 14E-7-700.21)

Install approved operable type II emergency lighting system throughout 2nd floor, 3rd floor, 4th floor spaces used as Single Room Occupancy.

Location: OTHER : : OTHER SEQ:# 043

44 EL1885

Install required fire alarm system for 2nd floor, 3rd floor, 4th floor spaces used as Single Room Occupancy. (14E-7-760.180).

Location: OTHER : : OTHER SEQ:# 044

45 EL 1822

Remove exposed wiring at light fixture. (14E-4-410.48)

Light fixtures hanging by wires at 1st floor rear dock area and 1st floor commercial space. Open air splices at light fixtures various areas 2nd floor, 3rd floor, 4th floor spaces. Remove open wiring at light fixtures where required throughout premises. Dangerous and hazardous.

Location: OTHER : : OTHER SEQ:# 045

46 EL1817

Provide ground continuity for electrical cable, raceway, and enclosure. (14E-3-300.10, 14E-3-300.13)

Conduits not seated at boxes and pulled apart at fittings at rear dock area and roof. Ensure ground continuity where required throughout premises. Dangerous and hazardous.

Location: OTHER : : OTHER SEQ:# 046

47 EL1833

Strap and secure raceway and armored cable. (14E-1-110.13(a))

Unsupported raceways various areas basement, 1st floor, 2nd floor, 3rd floor, 4th floor and exterior. Secure raceways where required throughout premises.

Location: OTHER : : OTHER SEQ:# 047

48 EL1829

Remove exposed wiring. (14E-3-300.4)

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Exposed wire at 1st floor dock, 3rd floor front bedroom. Remove exposed wire where required. Dangerous and Hazardous.

Location: OTHER : : OTHER SEQ:# 048

49 EL1866

Remove unapproved flexible cord. (14E-4-400.12)

Excessive unapproved spliced together and spliced to boxes extension cords various areas 2nd floor, 3rd floor, 4th floor. Remove unapproved cords where required throughout premises. Dangerous and hazardous.

Location: OTHER : : OTHER SEQ:# 049

50 EL1870

Remove unapproved cord connection to light fixture. (14E-4-400.10, 14E-4-400.12, 14E-4-410.62(c)(1))

Excessive unapproved cord connections including open air splices to light fixtures various areas 2nd floor, 3rd floor, 4th floor. Remove unapproved cord connection to fixtures where required. Dangerous and hazardous.

Location: OTHER : : OTHER SEQ:# 050

51 EL 1886

Excessive wires in junction box at basement. Maintain box fill requirements where required throughout premises. (14E-3-314.16).

Location: OTHER : : OTHER SEQ:# 051

52 EL1848

Remove unapproved cord supply to permanently installed appliance. (14E-4-422.16)

Unapproved cord to water heater 3rd floor bathroom. Remove unapproved cord connections to appliances where required throughout premises. Dangerous and hazardous.

Location: OTHER : : OTHER SEQ:# 052

53 EL1818

Replace broken, inoperable, or painted over receptacle or switch. (14E-4-406.4)

Painted receptacles 2nd floor front. Broken receptacles 2nd rear kitchen. Broken receptacle hanging from box 2nd floor front. Replace defective devices where required throughout premises.

Location: OTHER : : OTHER SEQ:# 053

54 EL1819

Replace defective light fixtures. (14E-4-410.20, 14E-4-410.21, 14E-4-410.22, 14E-4-410.23)

Missing globes, broken fixtures various areas 1st floor, 2nd floor, 3rd floor, 4th floor and basement. Install globes and replace defective light fixtures where required throughout premises.

Location: OTHER : : OTHER SEQ:# 054

55 EL1820

Support loose light fixture. (14E-4-410.30, 14E-4-410.36)

Light fixtures hanging from emt set screw fittings at various areas 3rd floor. Unsupported light fixtures at basement. Secure light fixtures in approved manner where required throughout premises.

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Location: OTHER :: OTHER SEQ:# 055

56 EL 1886

Unapproved hand made light fixtures various areas 3rd floor. All light fixtures must be listed and identified. (14E-1-110.3).

Location: OTHER :: OTHER SEQ:# 056

57 EL1875

Receptacle outlets installed in bathrooms, garages, counter top spaces, unfinished basements and outdoor locations shall have ground fault protection for personnel.(14E-5-570.8)

Missing GFCI protection 2nd floor kitchen and bath. Install GFCI protection kitchen, bath, basement, exterior.

Location: OTHER :: OTHER SEQ:# 057

58 EL 1886

Excessive unsupported liquid tight flexible metal conduit at roof. (14E-3-350.10).

Location: OTHER :: OTHER SEQ:# 058

59 EL 1886

All exterior light fixtures, fittings, boxes must be listed for wet locations. (14E-1-110.3).

Location: OTHER :: OTHER SEQ:# 059

60 EL1856

Fasten and support outlet and/or junction box. (14E-3-314.23)

Unsupported boxes basement and various areas throughout premises. Secure boxes in approved manner where required.

Location: OTHER :: OTHER SEQ:# 060

61 EL1816

Install additional receptacle outlets. (14E-5-560.6, 14E-5-570.10(e))

Add receptacles throughout 2nd floor, 3rd floor, 4th floor, and where required to prevent excessive cord usage. Dangerous and hazardous.

Location: OTHER :: OTHER SEQ:# 061

62 EL 1886

Provide permits to correct violations and for the installation of electrical conduit, boxes, wire, devices, fixtures, and equipment throughout entire premises and to repair fire damage visible at 2nd floor rear and where required. Two new electrical services and modified distribution. Miscellaneous electrical throughout 1st and basement. 2nd floor, 3rd floor, 4th floor build outs. No permits. Insufficient permits. No inspections. (14A-4-404.6).

Location: OTHER :: OTHER SEQ:# 062

63 EL 1886

Provide all required rough inspections for previous electrical work throughout. (14A-5-505.2).

Location: OTHER :: OTHER SEQ:# 063

*** End of Violations***

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4. That Matthew Beaudet 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 Matthew Beaudet, 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