

Doc# 2312334022 Fee \$88.00

RHSP FEE: \$9.00 RPRF FEE: \$1.00 KAREN A. YARBROUGH

COOK COUNTY CLERK

DATE: 05/03/2023 01:23 PM PG: 1 OF 6

(3"x5" AREA TO BE LEFT BLANK FOR RECORDER'S OFFICE)

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS COUNTY DEPARTMENT, CHANCERY DIVISION

DONNA M. CANGELOSI, TRUSTLE, OF THE DONNA MARIE CANGELOSI FAMILY PUST DATED MARCH 1, 2000; ROBERT A. MORRISON; STEVEN M. GOTT; CONNIE MICALE; KEY BUSINESS FUNDING, INC. d/b/a KEY BUSINESS STRATEGIES, INC., a Colorado corporation; and BRANDON A. ARNER,

Plaintiffs,

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ROM-ALT. LLC, JAVIER J. ROMAN, EVANGELINA ROMAN, UNKNOWN OWNERS and NON-RECORD CLAIMANTS,

Defendants.

Case No. 2023 CH 04282

Property Address: 1910-2100 South 54th Avenue, Cicero, Illin is 60304

# 750 OFFICE NOTICE OF FORECLOSURE (LIS PENDENS)

Pursuant to 735 ILCS 5/2-1901 and 735 ILCS 5/15-1503, the undersigned certifies that the Complaint For Foreclosure And Other Relief in the above entitled mortgage foreclosure action was filed on May 1, 2023 and is now pending.

- The names of all parties and the case number is identified above. (1)
- The court in which said action was brought is identified above. (2)

- (3) The name of the title holder of record is: ROM-ALT, LLC
- (4) A legal description of the real estate sufficient to identify it with reasonable certainty is:

#### PARCEL 1: THAT PART OF BLOCKS 6 AND 18 DESCRIBED AS FOLLOWS:

BEGINNING AT THE SOUTHEAST CORNER OF SAID BLOCK 6, BEING ALSO THE INTERSECTION OF THE WEST LINE OF SOUTH 54TH AVENUE AND A LINE 311 FEET NORTH OF THE SOUTH LINE OF SECTION 21; THENCE WEST ON A LINE PARALLEL TO THE SOUTH LINE OF SAID SECTION 21, 333.81 FEET TO A POINT 50 FEET WEST OF THE ANGLE CORNER OF BLOCK 6; THENCE NORTHWESTERLY ALONG A LINE DRAWN TO A POINT 130 FEET NORTH OF THE SOUTH LINE OF BLOCK 18 AND 50 FEET WEST OF THE EAST LINE OF BLOCK 18, A DISTANCE OF 141.42 FEET; THENCE NORTH ALONG A LINE 50 FEET WEST OF AND PARALLEL TO THE EAST LINE OF BLOCK 18, A DISTANCE OF 725 FEET TO THE NORTH LINE OF SAID BLOCK 18, BEING ALSO THE SOUTH LINE OF WEST 19TH STREET EXTENDED EAST; THENCE EAST ON THE NORTH LINE OF BLOCK 18, 21.06 FEET; THENCE NORTH ON A LINE 4.2.75 FEET WEST OF AND PARALLEL TO THE EAST LINE OF BLOCK 6, A DISTANCE OF 56.08 FEET; THENCE NORTHEASTERLY 149.7 FEET ALONG THE WESTERLY LINE OF A 20 FEET EASEMENT STRIP GRANTED TO THE BALTIMORE AND OHIO CHICAGO TERMINAL RAILROAD COMPANY; THENCE SOUTHEASTERLY AT RIGHT ANGLES TO THE WESTERLY LINE OF SAID EASEMENT STRIP 20 FEET TO THE EASTERLY LINE OF SAID STRIP; THENCE SOUTHERLY STRAIGHT ON A DEFLECTING TO THE EAST FROM SAID SOUTHEASTERLY LINE OF SAID EASEMENT STRIP 4 DEGRAES 55 MINUTES 1-1/2 SECONDS, A DISTANCE OF 70 FEET; THENCE SOUTH ON A LINE AT RIGHT ANGLES TO THE SOUTH LINE OF WEST 19TH STREET EXTENDED EAST, 80.36 FEET TO A LINE 50 FEET NORTH OF AND PARALLEL TO THE SOUTH LINE OF WEST 19TH STREET EXTENDED EAST; THENCE EAST ON SAID LINE 50 FEET NORTH AND PARALLEL TO THE SOUTH LINE OF WEST 19TH STREET EXTENDED EAST, A DISTANCE OF 19.39 FEET; THENCE SOUTH PARALLEL TO THE EAST LINE OF BLOCK 6, A DISTANCE OF 50 FEET TO THE SOUTH LINE OF WEST 19TH STREET EXTENDED EAST; THENCE EAST ALONG THE SOUTH LINE OF WEST 19TH STREET EXTENDED EAST, A LISTANCE OF 354 FEET TO THE WEST LINE OF SOUTH 54TH AVENUE; THENCE SOUTH ON THE WEST LINE OF SOUTH 54TH AVENUE, A DISTANCE OF 824.88 FEFT TO THE SOUTHEAST CORNER OF BLOCK 6 AND THE PLACE OF BEGINNING, ALL OF THE ABOVE BEING IN GRANT LAND ASSOCIATION DESCRIBED PROPERTY RESUBDIVISION OF SECTION 21, TOWNSHIP 39 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN,

EXCEPTING THEREFROM THE FOLLOWING DESCRIBED 4 PARCELS OF LAND:

#### **EXCEPTED PARCEL A:**

A STRIP OF LAND 16 FEET IN WIDTH, BOUNDED AND DESCRIBED AS FOLLOWS: BEGINNING AT THE SOUTHEAST CORNER OF SAID BLOCK 6, BEING ALSO THE INTERSECTION OF THE WEST LINE OF SOUTH 54TH AVENUE AND A LINE 311 FEET NORTH FROM AND PARALLEL WITH THE SOUTH LINE OF SAID SECTION 21, AND RUNNING THENCE WEST ALONG SAID SOUTH LINE OF BLOCK 6 AND ALONG A WESTWARD EXTENSION OF SAID LINE, SAID SOUTH LINE BEING PARALLEL WITH SAID SOUTH LINE OF SECTION 21, A DISTANCE OF 333.81 FEET TO A POINT 50 FEET WEST OF THE

ANGLE CORNER OF SAID BLOCK 6; THENCE NORTHWESTERLY ALONG A LINE DRAWN TO A POINT 130 FEET NORTH OF THE SOUTH LINE OF BLOCK 18 AND 50 FEET WEST OF THE EAST LINE OF SAID BLOCK 18, A DISTANCE OF 22.65 FEET TO A POINT 16 FEET (MEASURED PERPENDICULARLY) NORTH FROM THE AFORESAID WESTWARD EXTENSION OF THE SOUTH LINE OF SAID BLOCK 6; THENCE EAST ALONG A LINE PARALLEL WITH THE HEREIN FIRST DESCRIBED LINE, A DISTANCE OF 349.81 FEET TO AN INTERSECTION WITH THE AFORESAID WEST LINE OF SOUTH 54TH AVENUE, AND THENCE SOUTH ALONG SAID WEST LINE OF SOUTH 54TH AVENUE, A DISTANCE OF 16 FEET TO THE POINT OF BEGINNING;

#### **EXCEPTED PARCEL B:**

THAT PART OF BLOCK 6 BOUNDED AND DESCRIBED AS FOLLOWS:: P.F.GINNING AT A POINT OF INTERSECTION OF THE WEST LINE OF SOUTH 54T. AVENUE WITH THE SOUTH LINE OF 19TH STREET EXTENDED EAST; THENCE WEST ALONG SAID EXTENDED LINE 354 FEET; THENCE NORTH PARALIEL WITH SAID WEST LINE 50 FEET; THENCE WEST 16.39 FEET; THENCE SOUTHEASTERLY TO A POINT ON A LINE 69.98 FEET SOUTH OF THE SOUTH L'N'E OF 19TH STREET EXTENDED EAST, SAID POINT BEING 353.8 FEET WEST OF THE WEST LINE OF SOUTH 54TH AVENUE AS MEASURED ALONG SAID PARALLEL LINE; THENCE EAST ALONG SAID PARALLEL LINE 80.14 FEET; THENCE NORTH PARALLEL WITH SAID WEST LINE 60.98 FEET; THENCE EAST PARALLEL WITH SAID EXTENDED LINE 273.26 FEET TO A POINT ON THE WEST LINE OF SOUTH 54TH AVENUE; THENCE NORTH ALONG SAID WEST LINE 9 FEET TO THE POINT OF BEGINNING;

#### **EXCEPTED PARCEL C:**

THAT PART LYING NORTH OF THE SCUTH LINE OF WEST 19TH STREET EXTENDED EAST;

#### **EXCEPTED PARCEL D:**

THAT PART OF THE EAST 50 FEET OF BLOCK 18 LYING NORTH OF THE SOUTH LINE OF BLOCK 6 EXTENDED WEST, ALL IN COOK COUNTY, ILLINOIS.

#### PARCEL 2:

THAT PART OF BLOCK 18 COMMENCING AT THE INTERSECTION OF THE NORTH LINE OF THE SOUTH 30 FEET OF BLOCK 18 WITH THE WEST LINE OF SOUTH 54TH AVENUE, SAID NORTHERLY LINE BEING 311 FEET NORTH OF THE SOUTH LINE OF SECTION 21; THENCE WEST ON SAID NORTH LINE OF THE SOUTH 30 FEET OF BLOCK 18, 333.81 FEET TO A POINT 50 FEET WEST OF THE ANGLE CORNER OF SAID BLOCK 18; THENCE NORTHWESTERLY ON A LINE MAKING AN ANGLE TO THE LEFT 44 DEGREES 56 MINUTES 10 SECONDS WITH THE NORTH LINE OF THE SOUTH 30 FEET OF SAID BLOCK 18 EXTENDED WEST, 20.53 FEET, MORE OR LESS, TO A POINT 14.5 FEET NORTH MEASURED AT RIGHT ANGLES TO THE NORTH LINE OF THE SOUTH 30 FEET OF BLOCK 18 EXTENDED WEST, SAID POINT BEING THE POINT OF

BEGINNING OF THE REAL ESTATE TO BE DESCRIBED; THENCE WEST PARALLEL WITH SAID NORTH LINE OF THE SOUTH 30 FEET OF BLOCK 18, 43.47 FEET, MORE OR LESS, TO A POINT 42 FEET EAST OF A LINE 50 FEET WEST OF AND PARALLEL WITH THE EAST LINE OF SAID BLOCK 18 EXTENDED SOUTH; THENCE NORTH ON A LINE 8 FEET WEST OF AND PARALLEL WITH THE EAST LINE OF SAID BLOCK 18 EXTENDED SOUTH 43.41 FEET TO A POINT 61.43 FEET, MORE OR LESS, NORTHWESTERLY FROM THE POINT OF BEGINNING; THENCE SOUTHEASTERLY ON A LINE MAKING AN ANGLE TO THE RIGHT WITH THE LAST DESCRIBED COURSE AT LAST DESCRIBED POINT OF 44 DEGREES 56 MINUTES 10 SECONDS 61.43 FEET, MORE OR LESS, TO THE POINT OF BEGINNING. (EXCEPT THAT PART LYING WEST OF THE WEST LINE OF BLOCK 6 EXTENDED SOUTH), ALL IN GRANT LAND ASSOCIATION RESUBDIVISION OF SECTION 21, TOWNSHIP 39 NORTH, PANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, LLINOIS.

#### PARCEL 3

BEGINNING AT THE SOUTH EAST CORNER OF BLOCK 6 IN GRANT LAND ASSOCIATION RESUBDIVISION OF SECTION 21, TOWNSHIP 39 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, BEING ALSO THE INTERSECTION OF THE WEST LINE OF SOUTH 54TH AVENUE AND A LINE 311 FEET NORTH OF THE SOUTH LINE OF SECTION 21; THENCE WEST ON A LINE PARALLEL TO THE SOUTH LINE OF SAID SECTION 21, 333.81 FEET TO A POINT 50 FEET WEST OF THE ANGLE CORNER OF BLOCK 6; THENCE NORTHWESTERLY ALONG A LINE DRAWN TO A POINT 130 FEET NORTH OF THE SOUTH LINE OF BLOCK 18 AND 50 FEET WEST OF THE EAST LINE OF BLOCK 18, A DISTANCE OF 141.42 FEET TO THE POINT OF BEGINNING; THENCE NORTH ALONG A LINE 50 FERT WEST OF AND PARALLEL TO THE EAST LINE OF BLOCK 18, A DISTANCE OF 725 FEET TO THE NORTH LINE OF SAID BLOCK 18, BEING ALSO THE SOUTH LINE OF 19TH STREET EXTENDED EAST; THENCE EAST ALONG THE NORTH LINE OF BLOCK 18, 50 FEET; THENCE SOUTH 725 FEET; THENCE WEST ON A LINE PARALLEL TO THE SOUTH LINE OF SECTION 21, A DISTANCE OF 50 FEET TO THE POINT OF BEGINNING, IN COOK COUNTY, ILLINOIS.

#### PARCEL 4:

BEGINNING AT THE SOUTH EAST CORNER OF BLOCK 6 IN GRANT LAND ASSOCIATION RESUBDIVISION OF SECTION 21, TOWNSHIP 59 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, BEING ALSO THE INTERSECTION OF THE WEST LINE OF SOUTH 54TH AVENUE AND A LINE 311 FEET NORTH OF THE SOUTH LINE OF SECTION 21; THENCE WEST ON A LINE PARALLEL TO THE SOUTH LINE OF SAID SECTION 21, 333.81 FEET TO A POINT 50 FEET WEST OF THE ANGLE CORNER OF BLOCK 6; THENCE NORTHWESTERLY ALONG A LINE DRAWN TO A POINT 130 FEET NORTH OF THE SOUTH LINE OF BLOCK 18 AND 50 FEET WEST OF THE EAST LINE OF BLOCK 18, A DISTANCE OF 141.42 FEET; THENCE NORTH ALONG A LINE 50 FEET WEST OF AND PARALLEL TO THE EAST LINE OF BLOCK 18, A DISTANCE OF 725 FEET TO THE NORTH LINE OF SAID BLOCK 18, BEING ALSO THE SOUTH LINE OF 19TH STREET EXTENDED EAST; THENCE EAST ALONG THE NORTH LINE OF BLOCK 18, 21.06 FEET TO THE POINT OF BEGINNING; THENCE NORTH ON A LINE 412.75 FEET WEST OF AND

PARALLEL TO THE EAST LINE OF BLOCK 6, A DISTANCE OF 56.08 FEET; THENCE NORTHEASTERLY 149.7 FEET ALONG THE WESTERLY LINE OF A 20 FEET EASEMENT STRIP GRANTED TO THE BALTIMORE AND OHIO CHICAGO TERMINAL RAILROAD COMPANY; THENCE SOUTHEASTERLY AT RIGHT ANGLES TO THE WESTERLY LINE OF SAID EASEMENT STRIP 20 FEET TO THE EASTERLY LINE OF SAID EASEMENT STRIP; THENCE SOUTHERLY ON A STRAIGHT LINE DEFLECTION TO THE EAST FROM SAID SOUTHEASTERLY LINE OF SAID EASEMENT STRIP 4 DEGREES 55 MINUTES 1.5 SECONDS, A DISTANCE OF 70 FEET; THENCE SOUTH ON A LINE AT RIGHT ANGLES TO THE SOUTH LINE OF WEST 19TH STREET EXTENDED EAST, 80.36 FEET TO A LINE 50 FEET NORTH OF AND PARALLEL TO THE SOUTH LINE OF WEST 19TH STREET EXTENDED EAST; THENCE EAST ON SAID LINE 50 FEET NORTH OF AND PARALLEL TO THE SOUTH LINE OF WEST 19TH STREET EXTENDED EAST, A DISTANCE OF 3.00 FEET; THENCE SOUTHEASTERLY 50.43 FEET ALONG A LINE THAT IS 20.33 FEET EAST OF THE EAST LINE OF BLOCK 18 TO THE SOUTH LINE OF WEST 19TH STREET EXTENDED; THENCE WEST ALONG SAID LINE A DISTANCE OF 70.33 FEET TO THE POINT OF BEGINNING, ALL IN COOK COUNTY, ILLINOIS.

Permanent Tax Id. Nos.: 16-21-306-031-0000 and 16-21-306-034-0000

- (5) Common address of mortgaged real estate: 1910-2100 South 54th Avenue, Cicero, Illinois 60804
- (6) Identification of the lien interest sought to be foreclosed:
  - a) Mortgagor: ROM-ALT, LLC
  - b) Mortgagee: Donna M. Cangelosi, Trustee, of the Donna Marie Cangelosi Family Trust Dated March 1, 2000; Robert A. Morrison; Steven M. Gott; Connie Micale; Key Business Funding, Inc. d/b/a Key Business Strategies, Inc., r Colorado corporation; and Brandon A. Arner
  - c) Date of Mortgage, Assignment of Leases and Ren., Security Agreement and Fixture Filing: November 29, 2021
  - d) Date and place of recording: December 9, 2021; Cook County Clerk
  - e) Recording document identification: Document No. 2134310315 (Mortgage).

Respectfully submitted,

DONNA M. CANGELOSI, TRUSTEE, OF THE DONNA MARIE CANGELOSI FAMILY TRUST DATED MARCH 1, 2000; ROBERT A. MORRISON; STEVEN M. GOTT; CONNIE MICALE; KEY BUSINESS FUNDING, INC. d/b/a KEY BUSINESS STRATEGIES, INC., and **BRANDON A. ARNER** 

By: /s/Lorne T. Saeks One of Their Attorneys

Lorne T. Saeks (Isaeks@muchlaw.com) COOK COUNTY CLOPK'S OFFICE

Much Shelist, P.C.

Prepared by and

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Firm Id. No. 48345