



Doc# 2402528086 Fee \$77.00

KAREN A. YARBROUGH
COOK COUNTY CLERK

DATE: 01/25/2024 02:20 PM PG: 1 OF 3

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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.)
MIDWEST INVESTORS GROUP, INC., et al.)
Defendant(s).)

No: 22 M1 400569

Re: 4827 W Irving Park

Courtroom 1111, Richard J. Daley Center

AGREED ORDER OF INJUNCTION AND JUDGMENT

This cause coming to be heard on the set call, the Court having jurisdiction over the subject matter and being advised in the premises,

THIS COURT FINDS:

- A. Defendants Midwest Investors Group Inc and Ali Ghaiani Gulzar , and the City of Chicago ("City") have reached an agreement to resolve this case, stipulate to the facts alleged in the Complaint and agree to the entry of the following orders:
- B. The premises contain, and at all times relevant to this case contained, the violations of the Chicago Municipal Code set forth in City's Complaint. Defendant(s) has/have a right to contest these facts, but knowingly and voluntarily stipulate(s) to said facts and waive(s) the right to trial, including the right to a jury trial, if any, and requests to resolve this matter in lieu of proceeding to trial by agreeing to the following terms:

ACCORDINGLY, IT IS HEREBY ORDERED THAT:

1. The judgment entered on December 14, 2023 in the amount of \$19,500.00 against Defendants Midwest Investors Group Inc and Ali Ghaiani Gulzar shall stand as judgment as to Count(s) I. Leave to enforce said judgment is stayed until February 15, 2024. Execution shall issue on the judgment thereafter. The remaining counts are dismissed without prejudice.
2. City agrees to accept \$ 500.00 in full settlement of the judgment if payment is made to the City of Chicago on or before February 14, 2024. If payment is mailed it must be postmarked on or before the above date and sent to ATTN: Kristina Mokrzycki 2 N. LaSalle St., Suite 320, Chicago, IL 60602.
3. Defendants Midwest Investors Group Inc and Ali Ghaiani Gulzar , and their heirs, legatees, successors, and assigns shall:
 - [a] bring the subject premises into full compliance with the Municipal Code of Chicago by January 31, 2025;

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- [b] not rent, use, lease, or occupy the subject premises and shall keep the same boarded and/or vacant and secure until the repairs required in the City's Complaint are completed, inspected and approved and further order of court;
 - [c] provide copies of all signed off permits, front and back, to the undersigned corporation counsel by February 28, 2025;
 - [d] Defendant(s) shall follow the compliance schedule set forth above and shall be subject to fines of \$500.00 per day for each violation of the Municipal Code of Chicago that exists past the due date of January 31, 2025. Such fines shall be calculated from the first day Defendant(s) violate(s) the compliance schedule and shall continue to run until Defendant(s) bring(s) the violation(s) into compliance.
4. The premises shall not be in full compliance unless Defendant(s) or subsequent owner(s) has/have obtained all necessary permits for work done at the premises. The provisions of this injunction and judgment shall be binding on the Defendant(s) and all successors, heirs, legatees, and assigns of the Defendant(s).
 5. Should Defendant(s) fail to comply with any provision of this Agreed Order, the City may petition the Court to enforce this Agreed Order. Defendant(s) shall be subject to the above agreed upon penalties for failure to comply as determined by this Court.
 6. The court reserves jurisdiction of this matter for the purposes of modification, enforcement, or termination of this Order of Injunction and Judgment.
 7. This matter is hereby taken off call by agreement of the parties, without prejudice, subject to the provisions agreed to and detailed above.

CASE OFF CALL

HEARING DATE: December 14, 2023

THE PARTIES HAVE READ AND AGREE TO ALL OF THE ABOVE TERMS AND CONDITIONS.

Steven Q. McKenzie
 Corporation Counsel #90909
 2 N. LaSalle, Ste. 320
 Chicago, IL 60602 (312) 744-8710
 Steven.mckenzie@cityofchicago.org

Defendants: Midwest Investors Group Inc and Ali Ghaiani Gulzar,
 member and agent of Midwest Investors Group Inc.
 3141 Country Lane, Wilmette IL 60091 (312)771-6600
 ghaziani711@gmail.com and esmaelghaziani@gmail.com

[Signature]

 Judge Murray Courtroom 1111

[Signature]
 Duplicate Original

Judge Leonard Murray

DEC 14 2023

Circuit Court - 2100

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

22M1 400569

CITY OF CHICAGO, a municipal corporation,)	Case No.	_____
Plaintiff)	Amount claimed per day	19,500.00
V.)	Address:	
MIDWEST INVESTORS GROUP INC)	4827 - 4831 W IRVING PARK RD	
Unknown owners and non-record claimants)	CHICAGO IL 60641-	
Defendants)		

COMPLAINT FOR EQUITABLE AND OTHER RELIEF

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

13-21-203-006-0000

LOTS 15 AND 16 IN GRAYLAND PARK ADDITION TO CHICAGO IN THE EAST 1/2 OF THE NORTHEAST 1/4 OF SECTION 21, TOWNSHIP 40 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

Commonly known as

4827 - 4831 W IRVING PARK RD CHICAGO IL 60641-

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.

MIDWEST INVESTORS GROUP INC , OWNER

Unknown owners and non-record claimants

3. That on 02/04/2022 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 NC2071

Remove work performed without permit and restore building or site to original construction.
(13-32-130, 13-32-290)