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DATE: 5/30/2024 10:25 AM
PAGE: 1 OF 11

**HEAT
IN THE CIRCUIT COURT OF COOK COUNTY
MUNICIPAL DEPARTMENT – FIRST DISTRICT**

CITY OF CHICAGO, a municipal corporation

Plaintiff

v.

CHICAGO SECOND TOWER LLC, et al.,

Defendants

) Case No. 22M1400122

) Address: **7548-7554 S. Blackstone
CHICAGO IL 60644**

) Room 1111, Richard J. Daley Center

) Lien Amount: \$1,500.00

CLAIM FOR RECEIVER'S LIEN

The claimant, City of Chicago, a municipal corporation, by the authority granted by Illinois Compiled Statutes, Chapter 65, Section 5/11-31-2, hereby files its claims for lien against the following described property.

Legal: LOT TWENTY-FOUR (24) (EXCEPT THE WEST EIGHT (8) FEET THEREOF) AND ALL OF LOT TWENTY-THREE (23) IN BLOCK THIRTY-SEVEN (37) IN CORNELL IN SECTION TWENTY-SIX (26), TOWNSHIP 38 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

Commonly Known as: 7548-7554 S. BLACKSTONE AVE., CHICAGO, IL 60644
PIN: 16-09-118-038-0000

The aforesaid lien arises out of City of Chicago vs. Chicago Second Tower LLC, et al, Case No. 22M1400122 filed in the Circuit Court of Cook County, in which a receiver was appointed for said property by Court Order dated 11/30/2023. The receiver incurred expenses approved by the Court, pursuant to an order entered 02/22/2024. Pursuant thereto, the receiver issues a certificate in the amount of \$1,500.00 and bearing interest at 10% annum for costs and fees, which was transferred and assigned the City of Chicago.

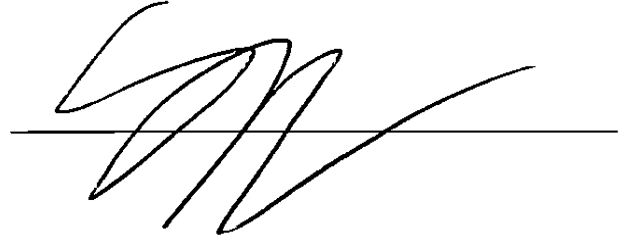
S Y
P II
S VI
SC Y
INTER

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Claimant, City of Chicago, by an Assignment dated 03/15/2024 claims a lien on the above cited real estate for the amount of \$1,500.00 plus statutory interest of 10%. The City hereby reserves the right to amend this lien from time to time to include additional costs and fees. Pursuant to 35 ILCS 200/22-35 the advances made by the City to this property must be paid by tax purchaser prior to obtaining a tax deed for this property.

City of Chicago, a Municipal Corporation
Mary Richardson-Lowry, Corporation Counsel

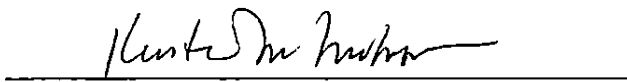
Steven Q McKenzie, Senior Counsel, being first duly sworn on oath, deposes and says that he is the authorized agent for the City of Chicago, that he has read the foregoing *Claim for Lien*, knows the content thereof, and that all statements therein contained are true.



SUBSCRIBED AND SWORN TO BEFORE ME

BY STEVEN Q MCKENZIE

This 16 day of May 2024



Mary Richardson-Lowry, Corporation Counsel #90909
2 N. LaSalle St., Ste 320
Chicago, IL 60602
Steven.McKenzie@cityofchicago.org / 312-744-8710

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

CITY OF CHICAGO, a municipal corporation,)	Case No: 22-M1-400122
)	
Plaintiff,)	
v.)	Address: 7548 South Blackstone
)	
Chicago Second Tower, LLC, et al)	Chicago, Illinois 60619
)	
)	Courtroom: 1105
Defendant (s))	Richard J. Daley Center

RECEIVER'S FINAL CERTIFICATE

The undersigned, **Globetrotters International Inc. and its Agent, Mr. David Feller** were appointed Limited Receiver, by the Court on November 30, 2023 and ordered to undertake specific tasks in connection with the above premises. For value received, the Receiver and its Agent, in their official capacity and not individually, promise to pay to bearer the sum of \$1,500.00 on or before ninety (90) days after the date of issuance of this certificate, with interest accruing at the rate of nine percent (9%) per annum until this receiver's certificate is fully paid, both principal and interest payable in such banking house or trust company in the City of Chicago, Illinois, as the legal holder of this receiver's certificate may appoint in writing or in the absence of such appointment, at the Office of the Building and Housing Division of the City of Chicago's Law Department.

This receiver's certificate is issued under and by virtue of an order of the Circuit Court of Cook County, Illinois, entered on February 22, 2024 in the above-entitled cause, and pursuant to Illinois Compiled Statutes, Chapter 5/11-31-2. This receiver's certificate is freely transferable and shall constitute a first lien in accordance with Illinois Compiled Statutes, Chapter 65, Section 5/11-31-2 and the foregoing order, upon the premises legally described as follows:

SEE ATTACHED LEGAL

Permanent Index Number: 20-26-404-031-0000

This receiver's certificate, together with the interest thereon, in no manner constitutes a personal obligation or liability of the Receiver or its Agent(s).


The holder of the receiver's certificate shall release the same receiver's certificate and the lien thereof by proper instrument, upon full and final payment of the underlying indebtedness evidenced by this receiver's certificate, either before or after maturity thereof. In the event the holder refuses to execute and deliver a release, the receiver may petition the court to order the holder to issue a release.

ASSIGNMENT

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For the sum of Ten Dollars (\$10.00) and for other good and valuable consideration, Mr. David Feller, Agent for Limited Receiver Globetrotters International, Inc., does hereby sell, assign and transfer to the City of Chicago, the foregoing receiver's certificate.

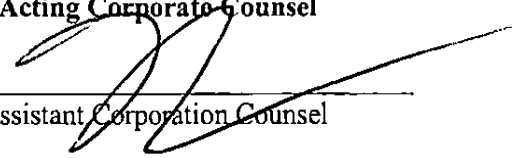
Dated: 3/15/24



David Feller, Agent for Receiver
Globetrotters International Inc.

The undersigned, an Assistant Corporation Counsel of the Chicago Law Department, is the duly authorized agent of the City of Chicago in the execution of this transaction.

No. 90909, Acting Corporate Counsel

By: 

Assistant Corporation Counsel

Mr. David Feller, Agent of Receiver
c/o Globetrotters International, Inc.
300 S. Wacker Drive, Suite 400
Chicago, IL. 60606
(312) 697-3556

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

CITY OF CHICAGO, a municipal corporation,)	Case No: 22-MJ-400122
)	
Plaintiff,)	Address: 7548-54 South Blackstone
)	
v.)	Chicago, Illinois 60619
)	
Chicago Second Tower, LLC, et al)	
)	Courtroom: 1105
Defendant(s).)	Richard J. Daley Center

ORDER FOR RECEIVER'S FINAL CERTIFICATE

This matter coming on to be heard on Receiver's Petition for the Court's approval of the final accounting and for authorization to issue a receiver's certificates, with due notice being given to all parties and the Court being fully advised in the premises;

THE COURT FINDS:

1. That on November 30, 2023, Globetrotters International Inc. was appointed limited receiver for the purpose of performing specific tasks at the subject premises.
2. That Receiver performed specific tasks as detailed in the final accounting for fees and expenses from November 30, 2023 through and including February 15, 2024.
3. That Receiver's final accounting state that, in the course of fulfilling its duties, Receiver incurred out of pocket costs totaling \$200.00, and that \$2,088.75 in fees were billed for a combined total of \$2,288.75.
4. The Court has in rem jurisdiction over the subject property and the Defendants, such as could be located for service of process, received due notice of the Receiver's appointment, its accounting and its petition for approval of the final accounting.
5. After thorough consideration of the Motion and attached exhibits, this Court finds that \$200.00 in out of pocket costs and ~~\$2,088.75~~ in fees for a total of ~~\$2,288.75~~ is fair, just and reasonable compensation for the work completed by Receiver. ~~\$1,300.00~~ ~~\$1,000.00~~

WHEREFORE, IT IS ORDERED:

- A. Globetrotters International Inc.'s costs and fees of ~~\$2,288.75~~ ^{\$1,500.00} are hereby approved and Receiver is granted leave to issue a receiver's certificate in said amount, with interest accruing on unpaid amounts from the date of this order is entered at a rate of 1% per annum.
- B. The certificate is hereby issued pursuant to the provisions of the Illinois Compiled Statutes, Chapter 65, Section 5/11-31-2.12

Hearing Date: February 15, 2024

Entered:

No. 90909
 Corporation Counsel
 Attorney for the Plaintiff
 By: Thad Stagle
 Assistant Corporation Counsel
 2 N. LaSalle Street, Suite 320
 Chicago, IL 60602
 (312) 744-8791

[Signature]
 Judge Murray, Courtroom 1105

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

2:30

20221400122
Judge: Courtroom, 1103

CITY OF CHICAGO, a municipal corporation,

) Case No.

Plaintiff

) Amount claimed per day

5,000.00

V.

) Address:

CHICAGO SECOND TOWER LLC

) 7548 - 7554 S BLACKSTONE AVE CHICAGO

) IL 60619-

Unknown owners and non-record claimants

)

Defendants

)

02/15/22

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:

20-26-404-031

LOT TWENTY-FOUR (24) (EXCEPT THE WEST EIGHT (8) FEET THEREOF) AND ALL OF LOT TWENTY-THREE (23) IN BLOCK THIRTY-SEVEN (37) IN CORNELL ~~IN THE~~ ~~SOUTH-EAST QUARTER~~ IN SECTION TWENTY-SIX (26), TOWNSHIP THIRTY-EIGHT (38) NORTH, RANGE FOURTEEN (14), EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

1103

Commonly known as

7548 - 7554 S BLACKSTONE AVE CHICAGO IL 60619-

and that located thereon is a

3 Story(s) Building

13 Dwelling Units

0 Non-Residential Units

IRIS Y MARTINEZ
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY

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2022 JAN 14 3:27 PM

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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 SECOND TOWER LLC , OWNER

Unknown owners and non-record claimants

3. 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:

- | | | | |
|---|----------|--|------------|
| 1 | CN105085 | Failed to provide and install building entrance door with deadlock latch with at least a 1/2 inch latch bolt projection for multi-unit residential buildings without an attendant being continuously on duty. (13-164-040)
7554 EXTERIOR DOOR; NO LOCK. | |
| | | Location: OTHER : :OTHER | SEQ #: 001 |
| 2 | CN104015 | Replace broken, missing or defective window panes. (13-196-550 A)
EAST WINDOW PANE; BROKEN. | |
| | | Location: OTHER : :OTHER | SEQ #: 002 |
| 3 | CN131026 | Repair or replace defective screen. (13-196-560 B)
BUILDING WINDOW SCREENS; TORN AND MISSING. | |
| | | Location: OTHER : :OTHER | SEQ #: 003 |
| 4 | CN138056 | Remove accumulation of refuse and debris and keep premises clean. (13-196-580, 13-196-630)
BASEMENT EXTERIOR STAIR, PORCH AREA AND SERVICE WALK AREA; JUNK AND DEBRIS. | |
| | | Location: OTHER : :OTHER | SEQ #: 004 |
| 5 | 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 EXTERIOR WALL; FRACTURE.
EAST EXTERIOR WALL; LIME STONE AROUND EXTERIOR DOORS BROKEN. | |
| | | Location: OTHER : :OTHER | SEQ #: 005 |
| 6 | CN062024 | Failed to maintain parapet wall in good repair and free from cracks and defects. (13-196-530 and 13-196-641)
EAST PARAPET WALL; LIME STONE OPEN JOINTS. | |
| | | Location: OTHER : :OTHER | SEQ #: 006 |
| 7 | CN197079 | Repair or replace defective or out of service smoke detectors and operate continuously. (13-196-130, 13-196-140)
7554 INTERIOR STAIR; SMOKE DETECTOR NOT WORKING. | |
| | | Location: OTHER : :OTHER | SEQ #: 007 |

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8

CN015062

Failed to remove obstruction from exitway that hampers travel and evacuation. (13-160-070, 13-196-080)

REAR EXTERIOR DOORS; BURGLAR BARS.

Location: OTHER : :OTHER

SEQ #: 008

9

CN073014

Failed to maintain exterior door in sound condition and repair. (13-196-550(d) and (e), 13-196-641)

7548 3RD FLR.REAR STORM DOOR; BROKEN OFF FRAME.

Location: OTHER : :OTHER

SEQ #: 009

10

CN070024

Failed to repair or replace defective or missing members of porch system. (13-196-570, 13-196-641)

7548 PORCH; TREADS AND TREAD WINDER BROKEN, LOOSE, ROOF JOIST ROTTED, STRINGER AND RISER BROKEN, PORCH UNSTABLE SWAY, UPRIGHTS INSUFFICIENT LAP JOINT CUT, IMPROPER FOOTINGS.

7552 PORCH; IMPROPER FOOTINGS, TREAD AND TREAD WINDER SPLIT, UPRIGHT INSUFFICIENT LAP JOINT CUT, RISER BROKEN, GUARD RAILS, DECK BOARDS BROKEN, GUARD RAILS, UPRIGHT, DECK BOARDS, RIM JOIST, DECK JOIST, LOOKOUT FIRE DAMAGE.[SUBMIT PLANS AND PERMITS TO REPLACE].

7554 PORCH; TREADS SPLIT, TREAD WINDERS BROKEN AND PULLING AWAY FROM SUPPORT.

Location: OTHER : :OTHER

SEQ #: 010

*** End of Violation ***

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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

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VERIFICATION

The undersigned, being first duly sworn on oath, deposes and says that he/she is the duly authorized agent of the plaintiff for the purpose of making this affidavit; that he/she has read the above and forgoing complaint, and has knowledge of the contents thereof, and that matters set out therein are true in substance and in fact, and as to matters alleged on information and belief that he/she believes them to be true.

DM

Subscribed and sworn to before me this 7th
Day of June 2020

By: Doris F Logan



Deputy Circuit Court Clerk or Notary Public

For further information Contact: Department of Buildings
Public Information Desk (312) 744 3400

Celia Meza, Corporation Counsel
Attorney for Plaintiff

By: *DM*

Assistant Corporation Counsel
2 N. LaSalle St., Suite 320
Chicago, Illinois 60602
Atty. No 90909
(312) 744-8791
Glenn.Angel@cityofchicago.org

Cook County Clerk's Office



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Proof of Service

Pursuant to section 13-12-070 of the Municipal Code of the City of Chicago, I, Steve Mazur, an employee of the City of Chicago Department of Buildings, do hereby certify that I served a Notice of Building Code Violations--Court Action, on each person named below at the address indicated for that person, by causing said notice to be placed in a sealed envelope, with proper postage prepaid, addressed to the address (es) indicated below and that I mailed the document via first class mail by causing the documents to be deposited in the United States mail at 2045 W. Washington Boulevard in Chicago, Illinois 60612

on or before 5:00 P.M. on 03/20/21

Address of Violation(s)

7548 - 7554 S BLACKSTONE AVE CHICAGO IL 60619-

A&S CAPITAL LLC

C/O JORGE SILBERSTEIN
5757 COLLINS AVE APT 906
MIAMI BEACH FL 33140

CHICAGO SECOND TOWER LLC

C/O ELI SIEGER
643 E. 71ST ST
CHICAGO IL 60619

FEDERAL HOME LOAN MORTGAGE CORP.

ATTN: LEGAL DEPARTMENT
8200 JONES BRACH DR.
MCLEAN VA 22102

By: 

Steve Mazur