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LIS PENDENS NOTICE

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

90M1-404605

CITY OF CHICAGO,  
A Municipal Corporation,

Plaintiff,

NO.

\$3.00  
FILING

-vs-

Limmie L. Jackson  
9035 South Greenwood  
Chicago, Illinois 60619

Cora J. Jackson  
9035 South Greenwood  
Chicago, Illinois 60619

172645 Jackson  
P.O. Box 149  
South Bend, IN. 46624-0149

Defendant (s)

\* \* \* REFER TO ATTACHED ADDENDUM OF DEFENDANTS \* \* \*

I, the undersigned, do hereby certify that the above entitled cause was filed in the above court on the \_\_\_\_\_ day of SEP 19 1990 199 for violations of the Chicago Building and Housing Code, and is now pending in said court and that the property affected by said cause is located at the following address: 9035 South Greenwood 2nd Floor

and described as follows: SEE ATTACHED TITLE SEARCH SHEET.

\* \* \* REFER TO ATTACHED ADDENDUM \* \* \*

Kelley R. Welsh  
Corporation Counsel  
City of Chicago

By: *[Signature]*

Assistant Corporation Counsel  
180 N. LaSalle St. Suite 501  
Chicago, Illinois 60601

or

Deposit in box no. \_\_\_\_\_

Recorders Office

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FILED

1990 SEP 19 AM 11:05

CLERK'S OFFICE  
CIRCUIT COURT OF COOK COUNTY  
MUNICIPAL DEPARTMENT - FIRST DISTRICT  
180 N. LA SALLE ST. CHICAGO, IL 60601

COOK COUNTY, ILLINOIS  
FILED FOR RECORD

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

CITY OF CHICAGO, a municipal  
Corporation,

Plaintiff

VS.

Limmie L. Jackson  
9035 South Greenwood  
Chicago, Illinois 60619

Cora J. Jackson  
9035 South Greenwood  
Chicago, Illinois 60619

172645 Jackson  
P.O. Box 149  
South Bend, IN. 46624-0149

Defendant

90MI-404605

NO. \_\_\_\_\_

AMOUNT CLAIMED \$ 2000

RE: 9035 South Greenwood  
2nd Floor

## COMPLAINT FOR EQUITABLE AND OTHER RELIEF

NOW COMES THE PLAINTIFF, CITY OF CHICAGO, A MUNICIPAL CORPORATION BY Kelley R. Welsh, ACTING CORPORATION COUNSEL, AND SAYS AS FOLLOWS:

### COUNT 1

1. THAT WITHIN THE CORPORATE LIMITS OF SAID CITY THERE IS A PARCEL OF REAL ESTATE LEGALLY DESCRIBED AS FOLLOWS.

Lot 19 and Lot 20 (except the S 12- $\frac{1}{2}$  feet thereof) in Block 4 in Baird and Rowland's Subdivision of Block 1 to 8, both inclusive in Calumet and Chicago Canal and Dock Company's Subdivision of part of the NW  $\frac{1}{4}$  and part of the SW  $\frac{1}{4}$  of Section 2, Township 37, North Range 14, East of the Third Principal Meridian, in Cook County, COMMONLY KNOWN AS 9035 South Greenwood - 2nd Floor Illinois. AND THAT LOCATED THEREON IS Two-Story ord. with 6 dwelling units and basement.

2. THAT AT ALL TIMES PERTINENT THERETO THE FOLLOWING NAMED DEFENDANTS

Limmie L. Jackson  
Cora J. Jackson  
172645 Jackson

OWNED, MAINTAINED, OPERATED, COLLECTED RENTS FOR OR HAD AN INTEREST IN THE SAID PROPERTY ON THE DATE(S) HEREINAFTER SET FORTH.

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3. That on or about September 12, 1990 and on numerous other occasions the following violations of the Municipal Code of Chicago existed in said property and said violations have not been corrected:

#101045

The 2nd Floor Apartment at 9035 South Greenwood has defective lead-bearing paint found in the following locations:

1. LIVINGROOM - North & west walls, baseboards on the east & south walls, Interior window stool & trim & exterior window sill & trim on the west wall.
2. KITCHEN - Bottom  $\frac{1}{2}$  west wall, ceiling, interior window stool & trim & exterior window sill & trim on the north wall.
3. PANTRY - North, east & west walls also interior window stool & trim & exterior window sill & trim on the north wall.
4. BATHROOM - Bottom  $\frac{1}{2}$  west wall.
5. HALL - Door casing on the south wall.
6. BEDROOM #1 - All walls, baseboard on the south wall, interior window stool & trim & exterior window sill & trim on the south wall.
7. BEDROOM #2 - North & west walls, door casing on the north wall, baseboards on the east & west walls door casing on the south wall.
8. BEDROOM #2 CLOSET - Ceiling.
9. FRONT PORCH - Deck, railing, pickets, uprights, ceiling, stairs, entire porch system grade to 2nd floor side on the east & west walls.
10. ENCLOSED REAR PORCH - South wall, ceiling, floor, door casing on the west wall & interior window stool & trim on the south wall.

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— Richard M. Arley  
Acting Commissioner

9035 South Greenwood - 2nd Floor

4. That \_\_\_\_\_ is the duly appointed Commissioner of the Department of Health for the City of Chicago, and as such, and through reports of Environmental Lead Inspectors of the Department of Health of said City of Chicago, he or the undersigned has 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 of Chapter 24, Section 11-31-1, 11-31-2 and 11-13-15 of the Illinois Revised Statutes, as amended.

Wherefore, Plaintiff prays for a fine against the Defendant, other than the Defendants whose only interest in the property is by virtue of Security interests or liens therein, in the said amount indicated on the heading of the Complaint for each day said violations have existed and/or exist, except as to violations of Section 39-13 of the Municipal Code of Chicago, for which violations, Plaintiff prays for a fine against all Defendants.

## COUNT II

As a second and further cause of action the Plaintiff, City of Chicago, a Municipal Corporation:

1-5 Realleges the allegations of paragraphs one through five of Count I as paragraphs 1 through 5 of Count II and further alleges.

6. That the levying of a fine is not an adequate remedy for the abatement of a nuisance and that it is necessary that a temporary and permanent injunction issue and a receiver be appointed to bring subject property into compliance with the Municipal Code of Chicago.

WHEREFORE, Plaintiff prays:

- a. For a temporary and permanent injunction requiring the defendants to correct the said violations and to restrain future violations permanently.
- b. For the appointment of a receiver, if necessary, to correct the conditions alleged in the Complaint with the full powers of receivership including the right to issue and sell receiver's certificates.
- c. For such other and further relief as may be necessary in the premises and which the court shall deem necessary.
- d. For reasonable attorney's fees and court costs.

CITY OF CHICAGO, a Municipal  
Corporation

CORPORATION COUNSEL

BY: \_\_\_\_\_

Assistant Corporation Counsel

90460473





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STATE OF ILLINOIS  
COUNTY OF COOK

)  
) SS  
)

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

*Cato Filley*

Subscribed and Sworn to

before me this \_\_\_\_\_

Day of \_\_\_\_\_

198 \_\_\_\_\_

DEPUTY CIRCUIT COURT CLERK  
OR - NOTARY PUBLIC

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Legal Description: Lot 19 and Lot 20 (except the S 12-1/2 feet thereof) in Block 4 in Baird and Rowland's Subdivision of Blocks 1 to 8, both inclusive in Calumet and Chicago Canal and Dock Company's Subdivision of part of the NW 1/4 and part of the SW 1/4 of Section 2, Township 37 North, Range 14, East of the Third Principal Meridian, in Cook County, Illinois.

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2011/08/17