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91660667

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

CITY OF CHICAGO
A Municipal Corporation

91660667

Plaintiff,

91M1-405267

RREEF USA FUND - HARTFORD
TOM SHEEHY
150 S. WACKER DR.
CHICAGO, IL 60606

No.

MIKE THOMPSON
ERNST & ERNST
150 S. WACKER
CHICAGO, IL 60606

Defendant(s)

I, the undersigned, do hereby certify that the above entitled cause was
filed in the above Court on the _____ day of DEC 12 1991
for Fire Ordinance Violation and is now pending in said Court and that
(kind of Action)
the property affected by said cause is located at the following address:

150 S. WACKER

and described as follows:

SEE LEGAL ATTACHED

\$3.00
FILING

Signature KELLY R. WELSH, CORPORATION COUNSEL
130 N. LASALLE
City of Chicago

91660667

By: William E. Gault
Assistant Corporation Counsel

Room 610, City Hall
Chicago, Illinois 60602

1991 DEC 12 PM 12:19

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-OR-

Deposited in Box No. _____ Recorder's Office

COOK COUNTY CLERK'S OFFICE
1991 DEC 17 AM 9

City of Chicago
City of Chicago

17ms

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10/01/2011

Property of Cook County Clerk's Office

10/01/2011

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FILING

10/01/2011

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CITY OF CHICAGO, a Municipal Corporation,)

VS. Plaintiff)

RREEF USA FUND - HARTFORD)
TOM SHEEHY)
150 S. WACKER DR.)
CHICAGO, IL 60606)

MIKE THOMPSON)
ERNST & ERNST)
150 S. WACKER)
CHICAGO, IL 60606)

Defendant)

No. 91M1-405267

AMOUNT CLAIMED \$ \$2,200.00

COMPLAINT FOR EQUITABLE AND OTHER RELIEF

NOW COMES THE PLAINTIFF, CITY OF CHICAGO, A MUNICIPAL CORPORATION BY KELLY 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:

SEE LEGAL ATTACHED

COMMONLY KNOWN AS 150 S. WACKER CACT. # 3205

AND THAT LOCATED THEREON IS 130 X 130 32 story/bant.2 FIRE RESISTANT STRUCTURE

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

RREEF USA FUND - HARTFORD
MIKE THOMPSON - ERNST & ERNST

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

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5/10/2014

- 1. 15-4-870, 13-160-260, 2-36-280
KEEP ALL EXIT DOORS SO THAT THEY CAN BE EASILY OPENED FROM THE INSIDE WITHOUT THE USE OF A KEY OR ANY SPECIAL KNOWLEDGE.
ELEVATOR VESTIBULE OBSTRUCTION 29TH FLOOR. SUBMIT PLANS
- 2. 15-4-870, 13-160-260, 2-36-280
KEEP ALL EXIT DOORS SO THAT THEY CAN BE EASILY OPENED FROM THE INSIDE WITHOUT THE USE OF A KEY OR ANY SPECIAL KNOWLEDGE.
ELEVATOR VESTIBULE OBSTRUCTION 28TH FLOOR. SUBMIT PLANS
- 3. 15-4-870, 13-160-260, 2-36-280
KEEP ALL EXIT DOORS SO THAT THEY CAN BE EASILY OPENED FROM THE INSIDE WITHOUT THE USE OF A KEY OR ANY SPECIAL KNOWLEDGE.
ELEVATOR VESTIBULE OBSTRUCTION 26TH FLOOR. SUBMIT PLANS
- 4. 15-4-870, 13-160-260, 2-36-280
KEEP ALL EXIT DOORS SO THAT THEY CAN BE EASILY OPENED FROM THE INSIDE WITHOUT THE USE OF A KEY OR ANY SPECIAL KNOWLEDGE.
ELEVATOR VESTIBULE OBSTRUCTION 25TH FLOOR. SUBMIT PLANS
- 5. 15-4-870, 13-160-260, 2-36-280
KEEP ALL EXIT DOORS SO THAT THEY CAN BE EASILY OPENED FROM THE INSIDE WITHOUT THE USE OF A KEY OR ANY SPECIAL KNOWLEDGE.
ELEVATOR VESTIBULE OBSTRUCTION 24TH FLOOR. SUBMIT PLANS
- 6. 15-4-870, 13-160-260, 2-36-280
KEEP ALL EXIT DOORS SO THAT THEY CAN BE EASILY OPENED FROM THE INSIDE WITHOUT THE USE OF A KEY OR ANY SPECIAL KNOWLEDGE.
ELEVATOR VESTIBULE OBSTRUCTION 23RD FLOOR. SUBMIT PLANS
- 7. 15-4-870, 13-160-260, 2-36-280
KEEP ALL EXIT DOORS SO THAT THEY CAN BE EASILY OPENED FROM THE INSIDE WITHOUT THE USE OF A KEY OR ANY SPECIAL KNOWLEDGE.
ELEVATOR VESTIBULE OBSTRUCTION 22ND FLOOR. SUBMIT PLANS
- 8. 15-4-870, 13-160-260, 2-36-280
KEEP ALL EXIT DOORS SO THAT THEY CAN BE EASILY OPENED FROM THE INSIDE WITHOUT THE USE OF A KEY OR ANY SPECIAL KNOWLEDGE.
ELEVATOR VESTIBULE OBSTRUCTION 20TH FLOOR. SUBMIT PLANS
- 9. 15-4-870, 13-160-260, 2-36-280
KEEP ALL EXIT DOORS SO THAT THEY CAN BE EASILY OPENED FROM THE INSIDE WITHOUT THE USE OF A KEY OR ANY SPECIAL KNOWLEDGE.
ELEVATOR VESTIBULE OBSTRUCTION 15TH FLOOR. SUBMIT PLANS
- 10. 15-4-870, 13-160-260, 2-36-280
KEEP ALL EXIT DOORS SO THAT THEY CAN BE EASILY OPENED FROM THE INSIDE WITHOUT THE USE OF A KEY OR ANY SPECIAL KNOWLEDGE.
ELEVATOR VESTIBULE OBSTRUCTION 14TH FLOOR. SUBMIT PLANS
- 11. 15-4-870, 13-160-260, 2-36-280
KEEP ALL EXIT DOORS SO THAT THEY CAN BE EASILY OPENED FROM THE INSIDE WITHOUT THE USE OF A KEY OR ANY SPECIAL KNOWLEDGE.
ELEVATOR VESTIBULE OBSTRUCTION 13TH FLOOR. SUBMIT PLANS

3. THAT ON OR ABOUT OCTOBER 21, 1991 AND ON NUMEROUS OTHER OCCASIONS THE FOLLOWING VIOLATIONS OF THE MUNICIPAL CODE OF CHICAGO EXISTED AND ON NUMEROUS OTHER OCCASIONS SAID PROPERTY AND SAID VIOLATIONS HAVE NOT BEEN CORRECTED:

UNOFFICIAL COPY 7 1 6 3 0 3 6 7

150 S. WACKER
VIOLATIONS 10-21-91

Property of Cook County Clerk's Office

INSPECTOR: LT. BARRON
COURT ROOM: 1109
COURT DATE: JANUARY 16, 1992
COURT TIME: 9:30 A.M.

RREEP USA FUND - HARTFORD
TOM SHEEHY
150 S. WACKER
CHICAGO, IL 60605

ADDRESS OF PREMISES:

150 S. WACKER

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4. That Francisco de la Cerna is the duly appointed Deputy Commissioner in charge of the Bureau of Fire Prevention for the City of Chicago, and as such and through report of Fire Inspectors of the said Bureau 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 defendants, 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 one through five of Count II and further alleges:

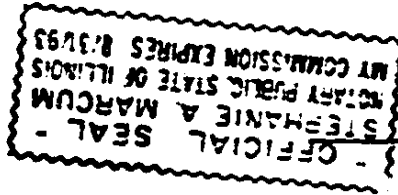
6. That the levying of a fine is not an adequate remedy for the abatement of a nuisance, and that it is necessary that a temporary and permanent injunction issue and a receiver be appointed to bring the subject property into compliance with the Municipal Code of Chicago.
7. That Francisco de la Cerna, the duly appointed Deputy Commissioner in charge of the Fire Prevention Bureau for the City of Chicago, has determined said building to be dangerous and unsafe or uncompleted and abandoned.

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 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.
- c. For an order of the plaintiff to demolish said premises and judgement against defendants and a line of the subject property for the cost of demolition in accordance with Section 11-31-1 of Chapter 24 of the Illinois Revised Statutes, as amended, or for an order for plaintiff to demolish said premises under the police power to protect the public health and safety.

3166667

29993916



NOTARY PUBLIC
Stephanie Marcum

SUBSCRIBED AND SWORN TO
BEFORE ME THIS 5th
DAY OF December, 1991.

Property of Cook County Clerk's Office

Francisco de la Cerna
Francisco de la Cerna

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 content thereof, and that the matters set out therein are true in substance and in fact, and that as to matters alleged on information and belief that he believes them to be true.

BY: _____ CORPORATION COUNSEL

CITY OF CHICAGO, A MUNICIPAL CORPORATION
KELLY R. WELSH

STATE OF ILLINOIS)
COUNTY OF COOK)

e. For reasonable attorneys fees and court costs.

d. For such other and further relief as may be necessary in the premises and which the court shall deem necessary.