



CITY OF CHICAGO
DEPARTMENT OF ADMINISTRATIVE HEARINGS
BUILDINGS HEARINGS DIVISION
400 WEST SUPERIOR, ROOM 115
CHICAGO, ILLINOIS

2007 AUG 22 PM 3:48
DEPT. OF ADMIN. HEARINGS
FILED

CITY OF CHICAGO,)	No. 07 BN 00419A
a municipal corporation,)	
Plaintiff,)	Re: 817 W. Lake
v.)	Chicago, Illinois
RAUL PEREZ, RAUL D. PEREZ,)	
PERCY PEREZ, TONY PEREZ, JEHAD)	PIN: 17-08-434-002-0000
Y. SHEHADE, 817 W. LAKE ST. INC.,)	
Respondents.)	

SECOND AMENDED COMPLAINT

Plaintiff City of Chicago ("City"), by its attorney, Mara S. Georges, complains of Respondents RAUL PEREZ, RAUL D. PEREZ, PERCY PEREZ, TONY PEREZ, JEHAD Y. SHEHADE, 817 W. LAKE ST. INC. ("Respondents"), as follows:

GENERAL ALLEGATIONS - THE PARTIES AND PROPERTY IN ISSUE

1. The City is a municipal corporation and a home-rule unit organized and existing pursuant to the laws of the State of Illinois.
2. There is a property commonly known as 817 W. Lake, Chicago, Illinois ("Subject Property"), with a property index number of 17-08-434-002-0000 and the following Legal Description:

Lot 4 in Block 36 in Carpenter's Addition to Chicago, a Subdivision of the South East 1/4 of Section 8, Township 39 North , Range 14, East of the Third Principal Meridian, in Cook County, Illinois.
3. At all times relevant to this complaint, the Respondents owned, managed or controlled the property located at the Subject Property.
4. This Complaint is brought pursuant to the Drug and Gang Houses, Houses of Prostitution and Other Disorderly Houses Ordinance, Section 8-4-090 of the City's Municipal Code ("Code").
5. Section 8-4-090 of the Code provides that any premises used for prostitution, illegal gambling, illegal possession or delivery of or trafficking in controlled substances, or any other activity that constitutes a felony, misdemeanor, business offense or petty offense

