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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

State of Illinois and City of Chicago *ex rel.*
 Timothy Haggerty,

 Plaintiffs,

 v.

 ResiPro, LLC and ResiCap, LP,

 Defendants.

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) Case No. 2020 L 007974
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) Judge James E. Snyder
)
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CITY OF CHICAGO'S COMPLAINT-IN-INTERVENTION

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INTRODUCTION

1. The City of Chicago maintains a robust permitting and enforcement system to promote safety in residential construction projects. The Defendants in this case rehabilitate properties in bulk. To achieve quick profits at any cost, Defendants ResiPro, LLC and ResiCap, LP (together, “Defendants”) knowingly ignored City permitting requirements and engaged in a variety of unfair business practices.

2. Defendants are Atlanta-based companies that bill themselves as the premier residential “renovation, maintenance, and preservation solution . . . for institutional owners of single-family homes.” Large institutional owners of residential properties, typically banks and private equity firms, hire Defendants to renovate and rehabilitate properties before selling them at a profit to individual homeowners or to other companies for use as rental properties.

3. ResiPro, which renovates and rehabilitates properties for ResiCap, LP, operates in 34 states and 59 metro areas, managing and renovating thousands of properties at a time. In 2018 and 2019 alone, ResiPro was the contractor for nearly 1,000 residential properties in Illinois and nearly 300 properties in Chicago.

4. The business of acquiring, renovating, and re-selling residential properties is extremely lucrative, both for Defendants and the real estate investment firms with which they partner. As of 2019, ResiPro was the third largest home remodeler in the United States, with over \$400 million in remodeling gross sales that year alone.¹ And Lone Star Funds, the owner of many

¹ *ResiPro now No. 3 largest remodeler in the U.S.; rises on QR Top 500 List*, PR NEWswire Aug. 21, 2019, available at <https://www.prnewswire.com/news-releases/resipro-now-no-3-largest-remodeler-in-the-us-rises-on-qr-top-500-list-300905246.html>.

of the homes that ResiPro remodeled in Chicago, is a private equity firm that states on its website that it has invested \$7.2 billion in real estate projects.²

5. But these huge profits materialize only if Defendants remodel houses quickly, allowing the properties to be rented, sold to individual owners, or bundled into residential portfolios for sale to other real estate investment firms. Every day that Defendants spend rehabbing a property is a day that the property sits vacant, unable to be sold or rented and turn a profit.

6. To ensure that properties were rehabbed and flipped quickly, Defendants set aggressive project deadlines, often requiring that substantial renovations costing tens of thousands of dollars be completed in several weeks. But these deadlines are unrealistic, particularly for structural and other major work that requires the submission of detailed plans and/or architectural drawings to receive a permit. ResiPro used a host of unfair business practices to circumvent permit processes to maximize their profits. On information and belief, ResiPro did so with ResiCap's knowledge and approval.

7. *First*, ResiPro regularly and knowingly failed to obtain the required permits for Defendants' Chicago renovation projects. This was not merely an administrative failure that deprived the City of permit fees. Indeed, ResiPro often failed to acquire the necessary permits for significant construction work with the potential to critically impact the integrity and safety of the residential properties, including plumbing, electrical, HVAC, and deck work.

8. ResiPro's failure to acquire permits helps it evade City inspection. Many City permits require an inspection to ensure that the work performed was safe and up to code. As a result, for over 150 ResiPro-rehabbed properties without required permits, unknowing Chicagoans

² *Lone Star Fund IX*, LONE STAR FUNDS, available at <https://www.lonestarfunds.com/funds-raised/capital-growth/lone-star-fund-ix/>.

are living in potentially unsafe homes as owners or tenants, and, if they are owners, will be on the hook for future repairs or code violation fines.

9. **Second**, when it was advantageous for ResiPro to have a permit to display at the worksite, ResiPro submitted false statements about the scope of the work to receive a permit more quickly and cheaply. For example, ResiPro often obtained Easy Permits, which are permits issued by the City through a more streamlined process for “small, simple home and building improvement projects.”³ But ResiPro repeatedly acquired Easy Permits so it could place a permit in the window of a property to appease neighbors while completing significant renovations that went well beyond the scope of the Easy Permit.

10. **Third**, ResiPro often failed to use licensed sub-contractors for skilled trades work as required by the City’s Construction Codes. Instead, ResiPro either used completely unlicensed sub-contractors or general labor sub-contractors not licensed for the specific trades they performed. As a result, much of the work on ResiPro properties that requires significant skill and expertise – like plumbing, electrical, and HVAC – was not done to Code.

11. **Fourth**, on at least one occasion when City inspectors detected ResiPro’s failure to abide by the Construction Codes and issued a Stop Work order, ResiPro continued to work and finished the renovation in violation of the City’s order. On information and belief, ResiPro used similar tactics to defy Stop Work orders on other Chicago properties.

12. The City’s permitting and licensing laws are rigorous for good reason: they help ensure that Chicagoans’ homes are safe. In its haste to flip homes quickly and cheaply, ResiPro repeatedly and egregiously violated the City’s laws.

³ *Easy Permit Program*, CITY OF CHICAGO, available at <https://www.chicago.gov/city/en/depts/bldgs/provdrs/permits/svcs/easy-permits.html>.

13. ResiPro's evasion of permit requirements was strategic. Internal documents show that ResiPro often received the required permits in smaller municipalities where they believed were more likely to enforce building codes. ResiPro also secured permits when it believed that neighbors, condominium associations, or other members of the public would inquire about a project. But in a city as large as Chicago, ResiPro decided to complete as much work as possible without securing permits or licensed contractors. ResiCap leadership was aware of these failures because they sometimes resulted in City enforcement actions and fines.

14. Defendants' haphazard renovation work has occurred throughout Chicago. But troublingly, it is clustered on the South and West sides in historically underserved neighborhoods:



At the very same time that the City has prioritized equitable investment and neighborhood revitalization through INVEST South/West and other initiatives in Greater Roseland, South Shore,

Austin, and other neighborhoods,⁴ Defendants willfully performed unsafe and unpermitted renovations on homes that will later be offered for rent or for sale in those communities.

15. The City therefore brings this action to permanently enjoin Defendants from engaging in these practices and to secure appropriate restitution and other relief.

PARTIES

16. Plaintiff, the City of Chicago, is a municipal corporation and a home-rule unit organized and existing under the laws of the State of Illinois.

17. Defendant ResiCap, LP is a Delaware limited partnership with its headquarters and principal place of business at 3630 Peachtree Road NE, Suite 1500, Atlanta, GA 30326. ResiCap provides services to institutional real estate owners – entities that have bought properties in bulk and intend to renovate the properties in a short period of time in order to rent or resell for profit. ResiCap, LP's services include renovation, construction, property management, acquisition, and sales. On information and belief, during the period relevant to this complaint, ResiCap, LP operated under the names Residential Capital Management Group, LP (until 2019) and as Residential Capital Management Group, LLC (until 2018). On information and belief, ResiCap, LP does not have a certificate of authority to conduct business in the State of Illinois under its current or former names. It does not hold a business license from the City of Chicago.

18. Defendant ResiPro, LLC is a wholly-owned subsidiary of ResiCap, LP. ResiPro, LLC is registered to do business in Illinois and has its headquarters and principal place of business at 3630 Peachtree Road NE, Suite 1500, Atlanta, GA 30326. ResiPro formerly did business in

⁴ *Invest South/West Two Year Update: Advancing Equity and Community Goals*, CITY OF CHICAGO Nov. 2021, available at https://www.chicago.gov/content/dam/city/sites/invest_sw/ISW_TwoYear_Update_Nov17.pdf

Illinois as Ameritrust Residential Services, LLC. On information and belief, Ameritrust Residential Services changed its name to ResiPro in 2019. ResiPro is ResiCap’s renovation division, and it served as the General Contractor for Defendants’ renovation properties in Chicago.

19. On information and belief, Defendant ResiCap, LP manages and controls Defendant ResiPro, LLC.

VENUE AND JURISDICTION

20. The Circuit Court has subject matter jurisdiction under Article VI, Section 9 of the Illinois Constitution, which grants Circuit Courts original jurisdiction in all causes other than those specifically enumerated therein.

21. This Court has specific personal jurisdiction over Defendants under 735 ILCS 5/2-209 because the causes of action alleged herein arise from the following Defendants’ activities: (1) purposely transacting and conducting business within the Chicago and Illinois, including by acquiring, renovating, rehabilitating, maintaining, and reselling properties for profit; (2) employing dozens of workers in Illinois and Chicago to manage and perform work on Defendants’ properties; (3) engaging in deceptive and unfair business practices in Chicago and Illinois, as set forth herein; and (4) making and performing contracts and promises substantially connected to Illinois, including agreements relating to properties in Illinois and statements made to Chicago government entities in connection with Defendants’ applications for permits.

22. Venue is proper under 735 ILCS 5/2-101 because the transactions underlying the City’s claims occurred in Cook County.

FACTS

I. THE CHICAGO CONSTRUCTION CODES

23. The Chicago Construction Codes (the “Code”) establish minimum standards for the construction, alteration, repair, maintenance, and demolition of buildings and other structures.

24. The Code is in place to protect the public health, safety, and welfare of Chicago residents and to ensure that buildings are built in a safe manner.

25. The City's Department of Buildings reviews applications and issues permits for all construction, demolition, and repair work as required under the Code. The permit applications and post-project inspections ensure that construction work complies with the minimum standards of safety established by the Code.⁵

26. Permits are required before beginning most construction, demolition, or repair work. Specifically, the Code makes it "unlawful to construct, enlarge, alter, rehabilitate, repair, move, demolish, or change the occupancy classification of a building or structure, or to erect, install, enlarge, alter, repair, remove, convert, or replace any fire protection, electrical, gas, mechanical, or plumbing system, or conveyance device, the installation of which is regulated by the Chicago Construction Codes, or to cause any such work to be performed, unless a permit for such work has first been obtained from the building official in accordance with this chapter or the work is exempt from permit[.]" Municipal Code of Chicago ("MCC") § 14A-4-401.1.

27. The Department of Buildings issues many different types of permits with different levels of review. For example, the City offers Easy Permits for small home improvement projects. By contrast, Standard Plan Review permits are for more significant construction work. Those applications are more onerous, and often require drawings or plans prepared by an Illinois-licensed architect or structural engineer. In addition, the City issues trade-specific permits for skilled jobs involving masonry, plumbing, and electrical work.

⁵ *Permits*, CITY OF CHICAGO DEPARTMENT OF BUILDINGS, available at <https://www.chicago.gov/city/en/depts/bldgs/provdrs/permits.html>.

II. DEFENDANTS VIOLATED THE CITY'S LICENSING AND PERMITTING LAWS

28. Defendants rehabilitate and renovate properties in 34 states and 59 metro areas, managing and renovating thousands of properties at a time. In 2018 and 2019 alone, ResiPro served as the general contractor for around 1,000 residential properties in Illinois and hundreds of properties in Chicago.

29. Rehabbing properties quickly and cheaply is central to Defendants' business model. Every day that ResiPro spent rehabbing a property is a day that the property sits vacant, unable to be sold or rented.

30. Defendants hired Project Managers to estimate the cost of the renovations, identify sub-contractors to perform contracted work, and manage the projects through completion. Project Managers reported to Senior Project Managers, an Area Manager overseeing Chicago, and a Regional Manager overseeing the Midwest.

31. Defendants also employed Quality Control Managers to oversee work performed at the properties. On information and belief, Senior Project Managers, Area Managers, and Regional Managers were able to control, influence, and override Quality Control Managers' determinations whether work was properly performed.

32. For some of the period at issue in this complaint, ResiPro employed two permit coordinators for the Midwest region. On information and belief, the permit coordinators completed permit applications only when Project Managers requested them.

33. Defendants structured their business to encourage Project Managers renovating properties to move as quickly as possible. Under Defendants' "Project Manager Level & Incentive Program," Project Managers were eligible to receive a base salary and bonuses based on meeting certain performance measures, including the time to complete the project. Defendants attached a

“Project Completion Date” for each property based solely on the dollar-amount of work the managers described in their Initial Estimate for the renovation project. Incentive Program documents cite the following formula: “1 day for every \$1,000 in the estimate, plus two days to mobilize. For example, if a property has an approved budget of \$20k, then the property must be completed in 22 days from the day it was approved by the owner.” Project Managers would not receive their bonus if they missed the Project Completion Date.

34. The completion-date formula in the Incentive Program does not take into account the time it takes to apply for and receive permits from local authorities.

35. The Department of Buildings’ website maintains a list of the average time for Standard Plan Review permits over the past 30 days. On November 24, 2021, the average total time from submitting to receiving a permit was 65 days: 34 days with the Department of Buildings and 31 days with the Applicant.

36. Given the reality of the time it takes for applicants to compile the required permit information and for the Department of Buildings to conduct its review, Defendants’ Projected Completion Date formula rendered it impossible for Project Managers to meet their deadlines and receive their bonuses.

37. For example, if the contract included \$65,000 of work, Defendants’ formula – combined with the Department of Buildings’ current average processing time of 65 days – would leave a Project Manager with *two days* to complete significant renovation work in order to receive a bonus.

38. Although the Incentive Program allowed Project Managers to submit Requests for Delay to extend the Projected Completion date, those extensions were strongly discouraged in practice. In an email to Chicago-area Project Managers sent on May 1, 2019, Senior Project

Manager Russell Smith wrote that the team had to finish the listed projects with “NO EXCUSES” and “NO EXCEPTIONS.”

39. Senior Project Managers pushed their direct reports to finish projects by the Projected Completion date without regard for permitting requirements. On at least one occasion, a Senior Project Manager denied a Request for Delay when the Project Manager requested extra time to arrange for a City inspection.

40. Project Managers responded to these financial incentives exactly as Defendants intended. When William Stancato, a Project Manager who was later promoted to Senior Project Manager, explained to a ResiCap headquarters employee in December 2018 why he used unlicensed contractors and did not apply for required permits whenever possible, Stancato underscored that he “took this position because [he] could make a bonus” and that “losing some [money] is not normally in my vocabulary.”

41. ResiCap directed ResiPro to adopt the practices that forced Project Managers to finish work quickly at all costs, and ResiCap officials understood the consequences. Internal company documents show that when a municipality identified code violations at one of ResiPro’s renovation sites, ResiCap executives coordinated the legal response from their offices in Atlanta, including by hiring outside counsel to represent ResiCap and ResiPro. The ResiCap officials involved in responding to Code enforcement proceedings include: Beverly Freeman, Municipal Compliance Supervisor; Dina Dean, Municipal Compliance Team Lead; Candice Lubin, Title Compliance Manager; Tannis Stoops, Director of Property Transition; and Mike Stock, Vice President for Asset Compliance.

42. For example, internal communications include an email from an outside lawyer identifying herself as the “attorney[] for RESICAP in [a] pending case” filed by the City of

Chicago for Code violations at 3636 West 58th Street. The outside counsel worked with Tannis Stoops, ResiCap's Director of Property Transition, to secure compliance with the Court's orders. Counsel explained to Stoops that ResiPro had performed construction work without proper permits and warned Stoops that if ResiCap did not ensure ResiPro's compliance, the company may face a breach of contract lawsuit from the buyer and additional enforcement action from the City.

43. Internal communications show that outside attorneys coordinated with the ResiCap officials identified above to secure compliance in at least seven lawsuits that the City filed after discovering that ResiPro performed construction work without the required permits.

44. ResiCap officials repeatedly responded to enforcement actions when they arose but did not require ResiPro to change their practices and get the appropriate permits.

45. Defendants' business model effectively guaranteed that Project Managers would flout the City's laws, build unsafe homes, and risk the safety of Chicago residents.

III. RESIPRO CONSISTENTLY FAILED TO OBTAIN REQUIRED PERMITS FOR WORK THAT RESIPRO PERFORMED ON CHICAGO PROPERTIES

46. In Chicago, ResiPro repeatedly completed renovation projects without the required permits because this practice saved Defendants time and money. Defendants expected that in such a large city, building inspectors could not possibly inspect and investigate the hundreds or thousands of construction projects ongoing at any given time. Troublingly, while ResiPro rarely obtained the required permits in Chicago, they were much more likely to do so in smaller municipalities where inspectors were more likely to investigate an ongoing project.

47. ResiPro failed to obtain the required permits for two primary reasons.

48. First, applying for and receiving permits takes time, and ResiPro employees were desperate to meet their aggressive project deadlines so that they could quickly rehab and flip their properties. Failing to get permits made it more likely that projects could be completed quickly.

49. Second, permits cost money that would cut into the allocated budget for Defendants' projects and reduce profits. Permits themselves can cost hundreds of dollars. And for jobs requiring significant structural work, the City's permit application requires a full set of architectural drawings that can cost thousands.

50. Indeed, Project Managers were heavily incentivized to finish projects quickly and cheaply. As discussed above in Section II, Project Managers received bonuses only if their projects were completed within unrealistic deadlines. It was effectively impossible to meet these deadlines and budgets and receive the resulting bonus while obtaining permits.

51. An email from December 2017 lays bare Defendants' profit motive for failing to get permits and do inspections. In the email, Tang Vang, a Senior Project Manager, advised a Project Manager not to do a walk-through with a City inspector because the permits and inspection fees "could be astronomical which could be a final burden to the company and the owners."

On Thu, Dec 21, 2017 at 12:12 AM Tang Vang-Ameritrust <tvang@ameritrustresidential.com> wrote:

Shawn, has a date been schedule for the walk-thru? I would advise you that unless the house has been red-tag, please do not involve the city. The request could be astronomical which could be a financial burden to the company and owners. But I don't know the full details of this site. Please reach out to Rick in the near future to confirm this is the best approach. Thanks

Tang G. Vang

Sr. Project Manager - Illinois

Ameritrust Residential Services

52. To take another example, Timothy Haggerty, a Quality Control Manager, once identified a sub-standard two-story staircase that Defendants constructed at 1133 East 83rd Street. The staircase was built without permits and did not satisfy the Code's requirements. Haggerty voiced concerns about this safety issue on July 8, 2019. The same day, his supervisor Steve Kalafut

instructed Haggerty to approve the project despite the lack of permits or inspections so that the Project Manager could get his bonus.

53. ResiPro's failure to get permits in Chicago was not mere negligence—it was strategic. Project Managers reported that while ResiPro rarely got permits in Chicago, Defendants did get permits in smaller municipalities, such as Bartlett or Schiller Park. ResiPro got permits in those municipalities not because of unique legal requirements, but instead because they believed they were more likely to get caught.

54. When deciding whether to apply for the appropriate permits in a given municipality in Illinois, ResiPro Project Managers did not consider the laws in place or the scope of work. Instead, they only considered whether they would get caught if they performed work without the required permits. For example, when Project Manager Robert McBroom asked the Permit Coordinator Daniela Guevara “if we pull permits in th[e] village” of Momence, Guevara said that she did not know but could look into it. A few minutes later, Senior Project Manager Matt Bannon wrote back and said “No permit.” There was no discussion of the scope of work or the building code in place in Momence, Illinois:

From: Matt Bannon <mbannon@resipro.com>
Sent: Monday, August 05, 2019 2:31 PM CDT
To: Daniela Guevara <dguevara@resipro.com>
CC: Robert McBroom <rmcbroom@resipro.com>
Subject: Re: Mومence (Matt Bannon's Mail)

No permit.
Matt Bannon | Senior Project Manager | Chicago
ResiPro

(M)
E-mail: mbannon@resipro.com
Website: www.resipro.com

CONFIDENTIALITY NOTICE:

This transmission contains information which may be confidential and/or legally privileged. The content of this email message and any attachments are intended only for the use of the individual or entity names on this transmission document. If you are not the intended recipient, you are hereby notified that using, copying, printing, storing, altering, retaining, disclosing, distributing, transmitting, or taking any action in reliance on the contents of this information is strictly prohibited. If you received this transmission in error, please notify the sender immediately.

On Mon, Aug 5, 2019 at 2:24 PM Daniela Guevara <dguevara@resipro.com> wrote:
I've never even been here. We can call and ask.

On Mon, Aug 5, 2019 at 2:23 PM Robert McBroom <rmcbroom@resipro.com> wrote:
Dani,

Do you know if we pull permits in this village?

Regards,

Robert McBroom | Project Manager | Illinois
ResiPro

(M)
E-mail: rmcbroom@resipro.com
Website: www.resipro.com

55. Consistent with Defendants' policy of applying for permits only when doing so was necessary to avoid fines and local enforcement actions that would slow construction, ResiPro got permits for Chicago projects only when ResiPro had reason to believe that the City was aware of their work.

56. For example, Senior Project Manager Matt Bannon indicated in a November 2019 email that on a particular Chicago property (unlike others in the City), they would have to get permits. Bannon explained that they had to get "an easy permit here at least" at the property "since the City knows about it:"

From: Richard Rainis <rrainis@resipro.com>
Sent: Thursday, November 07, 2019 3:39 AM CST
To: Matt Bannon <mbannon@resipro.com>
Subject: Re: Building Court ***11618 S. LAFLIN ** URGENT / Our File 102653-6 (Matt Bannon's Mail)
I'll wait till it comes back to construction before notifying Dani .

Sent from my iPhone

On Nov 6, 2019, at 8:28 PM, Matt Bannon <mbannon@resipro.com> wrote:

We will probably have to do an easy permit here at the least since the city knows about it.

On Wed, Nov 6, 2019 at 6:07 PM Richard Rainis <rrainis@resipro.com> wrote:

Hi Matt , what is this all about?
Sent from my iPhone

57. Similarly, in August 2018, ResiPro's Permit Coordinator, Daniela Guevara, emailed a Project Manager and explained that unlike Defendants' typical projects in Chicago, they were not "able to remodel without getting permits" because they "ha[d] violations [and were] already being watched by inspectors."

From: Richard Carr <rcarr@ameritrustresidential.com>
Sent: Tuesday, August 07, 2018 9:29 AM CDT
To: Daniela Guevara <dguevara@ameritrustresidential.com>
Subject: Re: Chicago permits (Richard Carr's Mail)

ok then go in for permits, I would recommend talking with brittney and find out if we go in for an easy permit? let me know what you decide, you know the process for chicago right/

On Tue, Aug 7, 2018 at 9:25 AM, Daniela Guevara <dguevara@ameritrustresidential.com> wrote:

Good morning Rick,

I spoke to Matt about getting a permit in Chicago and he reminded me that for 1626 33rd St we have violations and probably won't be able to remodel without getting permits due to this property already being watched by the inspectors

--
Daniela Guevara | Permit Coordinator| Illinois
Ameritrust Residential Services

58. Supervisor-level ResiPro employees told Project Managers to avoid getting permits when possible to meet tight deadlines. In an April 2020 email, a Senior Project Manager made this instruction explicit in an email about properties in Northern Indiana, writing, "If there is a job you can do without permits then do so with caution." (Highlight added below)

From: Russell Smith <russellsmith@resipro.com>
Sent: Thursday, April 16, 2020 12:52 PM CDT
To: Eduardo Gomez <egomez@resipro.com>; Timothy Buckley <tbuckley@resipro.com>; Yuriy Shelikhevyh <yshelikhevyh@resipro.com>
Subject: Fwd: (Yuriy Shelikhevyh's Mail)

Guys,

Here are Matts notes on the assigned Indiana jobs. Please review the buyouts he already did, but your welcome to do your own buyouts. Peter has been out to measure for windows, we can not use Studio41 windows there.

First goal is to get to these jobs and review scopes and needs for Change Orders, some of these are very old

Please keep in mind these are **very low valued properties** so keep everything only to **what HAS to be done. do not create work on these jobs. All must be rent ready!**

I am working with Dan W and Pace to reset the completion dates, please review the past notes prior to submitting your forecasts on weekly notes. Once the corrected RFDs are approved we can then jump the forecast ahead to match.

Reach out to Blue Collar to see if they can obtain permits for those needed FIRST. **If there is a job you can do without permits then do so with caution.**

I am traveling out there on Friday to review all these properties. Please let me know if you have any questions.

Russell Smith | Senior Project Manager | Midwest-Chicago
ResiPro

59. Further confirming that performing work without permits was standard practice, when ResiPro's Project Managers submitted Requests for Delay to extend deadlines while waiting for permits and City inspections, Senior Project Managers regularly denied those requests. Put differently, projects were expected to be completed on time even if that meant failing to get permits.

60. The examples below are illustrative of ResiPro's failure to obtain the required permits on Chicago properties.

61. The City alleges that Defendants' failure to obtain the required permits was widespread in the City of Chicago. While Defendants did not fully comply with the City's subpoena requesting a list of the work performed at each property, the City alleges on information and belief that ResiPro similarly failed to obtain the required permits on all the properties listed in Appendix A, and that ResiCap knew or should have known about these failures and had the power to address them.

A. 3359 South Indiana Avenue

62. 3359 South Indiana Avenue is a residential property in Bronzeville.

63. Defendants contracted with the owner of the property, U.S. Bank Trust, N.A. as Trustee for LSF9 Master Participation Trust, on October 15, 2018, to perform work on the property costing \$134,472.46. ResiPro completed renovations on the property in late 2018 and early 2019.

64. The Initial Estimate that Defendants submitted to the owner included significant renovation work, including:

- a. Replace stolen pipes with all new copper pipes throughout the property;
- b. Remove and install a new roof;
- c. New electrical wiring;
- d. Demolish rear porch;
- e. Build an exterior deck.

65. Through a change-order request in February 2019, Defendants requested approval for changes to the contract that would add \$20,599.59 in additional work. The change order included, among other items, installing new PVC plumbing lines throughout the property. In the change order submitted to the client, Defendants noted that the new plumbing lines would be installed by a "Licensed Plumber." Subsequent change orders did not eliminate or reduce any of the work described above.

66. As expected for a project of this scope and size, several of the work items at 3359 South Indiana required permits under the Code. At minimum, this included installing new water supply and sewer plumbing lines, new electrical wiring, and a new roof as well as demolishing a rear porch.

67. Despite performing substantial work at 3359 South Indiana Avenue, ResiPro did not obtain *any* permits, not even for the plumbing work that Defendants identified as requiring a licensed plumber. The last permit the City issued relating to this property was in 1990.

68. ResiPro’s failure to apply for the proper permits is no surprise given the company’s pressure to complete this project quickly. On April 28, 2019, Defendants’ Midwest Regional Manager Dan Weitzenkamp sent an email to Defendants’ Midwest-area Property Managers, titled “WAY BEHIND!!!” in which he pressured them to speed up their renovations and meet deadlines:

On Sun, Apr 28, 2019 at 5:03 PM Daniel Weitzenkamp <dweitzenkamp@resipro.com> wrote:

Gentlemen,

How did we go from projecting 12 properties to close to only closing 6?! What is going on in Chicago?!?!?! I have been walking properties today and will continue to do so Monday and Tuesday! We need to finish strong!

Regards,

Dan Weitzenkamp | Regional Manager | Midwest Region
ResiPro

69. Russell Smith, a Senior Project Manager for the Midwest-Chicago, responded to the email by agreeing that “there has been a loss of urgency with [his Project Managers].” He highlighted several properties that were behind, including 3359 South Indiana Avenue.

70. In addition to construction delays, if Defendants had applied for and received the proper permits, they would have incurred additional costs. For example, permits to perform roof work can cost between \$175 and \$450.

71. ResiPro’s substandard work at the property created serious safety concerns. For example, Quality Control Managers Kalafut and Haggerty visited the property on May 17, 2019 to examine the wooden deck that Defendants built without permits and that was never inspected

by the City. Haggerty made the deck move by shaking it from the top stair. Despite this clear safety concern, Kalafut informed Haggerty that senior management planned to approve the property.

72. Had ResiPro applied for and received the proper permits, it would have needed to arrange for an inspection with the City's Department of Buildings. During an inspection, the City would have been able to identify issues requiring remediation to ensure the safety of the property for future residents.

B. 5323 South Maplewood Avenue

73. 5323 South Maplewood Avenue is a single-family home in Gage Park.

74. Defendants contracted with the owner of the property, U.S. Bank Trust, N.A. as Trustee for LSF9 Master Participation Trust, on October 17, 2018, to perform work on the property costing \$54,463.02.

75. ResiPro completed renovations on the property in late 2018 and early 2019. Defendants' initial estimate from October 10, 2018, stated that the total cost of renovations for the property would be \$49,844.59. In the following months, Defendants submitted change orders to the client requesting approval for changes to the contract that would add over \$12,000 in costs for additional work to be performed on the property.

76. Defendants' initial estimate and subsequent change orders included, among other items, the following work:

- a. Remove front deck and reinstall new deck with stairs;
- b. Demolition in basement;
- c. Replace water supply lines throughout the property;
- d. Replace siding and soffit.

77. Subsequent change orders submitted to the owner did not eliminate or reduce any of the work described above.

78. On November 13, 2018, Daniela Guevara, one of ResiPro's Permit Coordinators for Illinois, sent an email to other employees, listing 5323 South Maplewood as a project for which they were "Not pulling permits."

79. Multiple items in the Defendants' scope of work at this address required permits under the Code, such as removing the front deck and installing a new deck and new stairs, adding over 1,000 feet of siding, and replacing the water supply pipes. ResiPro's structural work on the property likely required a full set of architectural drawings.

80. To avoid these costs and the time it would take to receive permits, ResiPro did not receive any permits for work done at 5323 South Maplewood Street. The City last issued a permit for this property in 2007.

C. 10034 South Emerald Avenue

81. 10034 South Emerald Avenue is a single-family home in Roseland.

82. Defendants contracted with the owner of the property, U.S. Bank Trust, N.A. as Trustee for LSF9 Master Participation Trust, on June 1, 2019, to perform work on the property costing \$46,128.34. According to internal documents, ResiPro performed the substantial work described below in one month.

83. Defendants' Initial Estimate and change orders included the following renovation work:

- a. Rewire the entire house;
- b. Change all galvanized pipes to copper;
- c. New electrical connections in the kitchen;
- d. New lighting in basement.

84. Defendants identified a serious safety concern in the basement. The Project Manager wrote in the Initial Estimate that the entire basement needed to be demolished "due to

amount of water standing in basement for a long period of time.” The Project Manager also noted that in the basement “electric is live at the panel” and “[l]ive wires were hanging in the panel.”

85. Despite the significant scope of electrical and other work requiring a permit under the Code, ResiPro did not apply for or receive any permits for 10034 South Emerald Avenue nor have they had their work inspected by the City to ensure the safety of future occupants. The City has not issued a permit for this property since 1997.

86. Defendants made several payments to vendors and general contractors associated with the renovation at 10034 South Emerald Avenue, but internal documents do not show any payments made to a licensed electrician. As discussed further in Section IV.C, below, failure to use licensed subcontractors for skilled trades work violates City law and presents serious safety concerns.

D. 1442 West 105th Street

87. 1442 West 105th Street is a single-family home in Beverly. Defendants contracted with the owner of the property, U.S. Bank Trust, N.A. as Trustee for LSF9 Master Participation Trust, on December 27, 2019, to perform work on the property costing \$83,782.99. ResiPro performed renovations on the property in late 2019 through early 2020.

88. Defendants identified the following work to be performed in its initial estimate and change orders:

- a. Demolish back deck and build new landing and stairs;
- b. Replace water lines;
- c. Replace and rewire all electrical;
- d. Demolish basement;
- e. Remove and install new roof;

- f. Repair and install new venting and duct work, including new chimney liner, flue liner, new return air and plenum.

89. No subsequent change orders eliminated or reduced the scope of the work described above.

90. As expected for a project of this scope and size, several of the work items required permits under the Code, such as replacing and expanding the electrical system, replacing water supply lines, demolishing and rebuilding a 435 square foot deck, and undertaking significant duct work that must be performed by a licensed contractor.

91. Nevertheless, ResiPro did not receive any permits for work done between 2019 and 2020 at 1442 West 105th Street and did not have their work inspected to ensure its safety.

E. 2848 East 98th Street

92. 2848 East 98th Street is a single-family bungalow-style home on the South Side.

93. Defendants contracted with the owner of the property U.S. Bank Trust, N.A. as Trustee for LSF9 Master Participation Trust, on November 30, 2018, to perform work on the property costing \$64,938.36. ResiPro performed renovations on the property in late 2018 and early 2019.

94. Defendants originally estimated on October 5, 2018 that the renovations would cost \$57,848.12. The initial estimate included significant renovation work, including:

- a. Replacing water lines throughout property;
- b. Install a new furnace and water heater;
- c. Roof repair;
- d. Replacing an electrical panel, all breakers, and electrical home run from panel to device.

95. None of Defendants' subsequent change orders reduced the scope of work described above.

96. As expected for a project of this scope and size, several of the work items required permits under the Code, such as the electrical and plumbing work. But ResiPro did not receive any permits for the work performed at 2848 East 98th Street. The City last issued a permit for this property in 2004.

IV. RESIPRO KNOWINGLY DISPLAYED INCORRECT PERMITS AND FALSIFIED PERMIT APPLICATIONS TO EVADE CITY LAWS

97. While ResiPro often completed projects in Chicago without any permits, they knew that this practice was risky and might result in violations, fines, and construction delays. As a result, ResiPro employed several tactics to mislead City inspectors and neighbors.

98. For example, ResiPro instructed Project Managers to work with the blinds in windows closed so neighbors would not know Defendants were working on a property.

99. Other practices involved blatant misrepresentations. For example, ResiPro Project Managers displayed permits obtained for one property in the window of another property.

100. ResiPro also evaded rigorous permitting requirements by obtaining Easy Permits. ResiPro concealed the full scope of work to be performed on their permit applications in order to receive Easy Permits, which are cheaper, processed more quickly, and (when hung in the window at a renovation site) may look like an appropriate permit to people on the street.

101. These practices are deceptive, misleading, and violate City laws.

A. RESIPRO DISPLAYED PERMITS THAT PERTAINED TO OTHER PROPERTIES TO MISLEAD INSPECTORS AND NEIGHBORS

102. ResiPro avoided drawing attention to unpermitted work by placing permits in the window of ongoing construction projects, even if the permits were not related to that property.

This blatantly false and deceptive practice assuaged the concerns of neighbors and passersby by giving the misleading impression that the work at the property was permitted.

103. For example, on or about August 13, 2019, ResiPro employees placed a permit for a property located at 3636 West 58th Street in the window of a property located at 3632 South Leavitt Street.

104. Quality Control Manager Tim Haggerty informed his supervisor Steve Kalafut about the false permit on or about August 13, 2019. The same day, Kalafut told him that there was nothing he could do because Defendants wanted the house completed quickly.

105. On information and belief, ResiPro misleadingly placed permits from one property in the windows of other properties on other occasions in Chicago.

B. RESIPRO OBTAINED EASY PERMITS BASED ON FALSE STATEMENTS MADE TO THE CITY ABOUT THE SCOPE OF DEFENDANTS' WORK

106. ResiPro manipulated the City's Easy Permit process to quickly and cheaply obtain a permit that it could display to avoid attention from neighbors and City inspectors. Those permits did not cover the full scope of the work, and ResiPro acquired them by making false statements and certifications to the City. ResiCap knew about these problematic permits when permit issues arose in enforcement proceedings.

107. The City allows contractors to obtain Easy Permits for minor work that does not require full architectural drawings to review the structural safety of a project. For example, contractors can apply for Easy Permits for installing fences, constructing a small shed, or hanging over 1,000 square feet of drywall.

108. General contractors and owners also may receive Easy Permits for some smaller scopes of work involving skilled trades like electrical, plumbing, ventilation, demolition, and masonry. When submitting an Easy Permit involving skilled trades work, the applicant must

identify licensed contractors who will perform the work. As further discussed in Section C below, ResiPro rarely used licensed sub-contractors, whether or not ResiPro had obtained the proper permits.

109. ResiPro regularly abused the Easy Permit process by misrepresenting the planned scope of work on Easy Permit applications. ResiPro's Project Managers or Permit Coordinators submitted Easy Permit applications omitting the more substantive work that ResiPro contracted to and did perform. The Department of Buildings would have denied Easy Permit applications if ResiPro had truthfully stated the scope of work. The Department would have required ResiPro to receive the appropriate permits and inspections.

110. ResiPro made false certifications to the City when applying for Easy Permits. Easy Permit applicants are required to list *all* the work to be performed. ResiPro, primarily through their Permit Coordinators Brittany Green and Daniela Guevara but also through Project Managers, regularly submitted Easy Permit applications that understated or completely fabricated the scope of work to be completed.

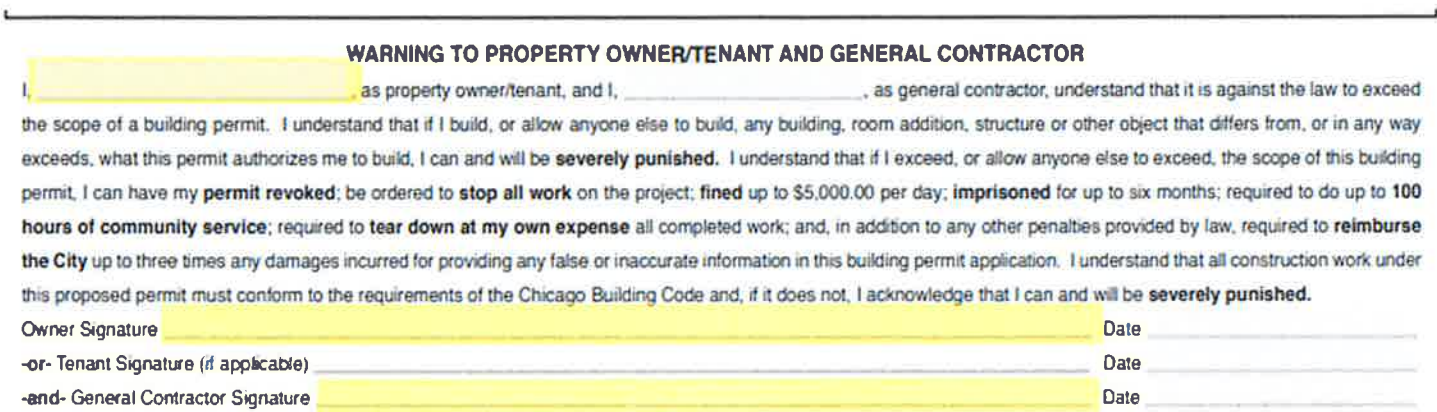
111. Many of ResiPro's falsified Easy Permit applications regularly contained the same scope of work, regardless of the project: replacing windows, kitchen cabinets, drywall, and tile.

112. ResiPro's falsified Easy Permit applications also misrepresented the dollar value of work to be performed. ResiPro often supplied to the City a work value estimate that was tens of thousands of dollars less than the amount that Defendants contracted for with the institutional owners of the properties.

113. ResiPro submitted false statements in Easy Permit applications to conceal their financial obligations to the City. Permits for larger projects cost more money, take more time to process, and often require the applicant to provide architectural drawings that can cost thousands

of dollars. By contrast, Easy Permits typically cost \$175, do not require drawings or plans, and are often processed within 24-48 hours.

114. ResiPro knew that its omissions and misstatements on Easy Permits were illegal because the Easy Permit application contains a section in which the applicant must certify that the work will not exceed the scope of the Easy Permit. A screenshot of the section is below:



115. ResiPro’s Project Managers recognized that if City inspectors saw the actual scope of work being done inside the properties, they would quickly recognize that the work went well beyond that covered by an Easy Permit.

116. For example, in an email with a sub-contractor about work performed at 7733 South Creiger Avenue, Project Manager Scott Goddard indicated that ResiPro planned to repair a water main break without permits.

----- Forwarded message -----
From: Scott Goddard <sgoddard@resipro.com>
Date: Thu, Jan 30, 2020 at 1:12 PM
Subject: Estimate needed
To: RR Plumbers <randrplumbingtechs@gmail.com>

Hi RR,
 Scott here with Resipro. I have a property at [7733 S Cregier Ave Chicago](#), that has a water main break between the B box and the house. Can you give me an estimate to repair/replace this? We are not pulling permits on this job.
 Call me questions,
 Thanks,
Scott Goddard | Project Manager | Chicago ResiPro

117. When the sub-contractor rejected ResiPro's request to perform the work without permits, Goddard told his supervisor that applying for a plumbing permit would prompt a City inspection and may result in the City "poking around on [the] inside work." That would be a problem, Goddard explained, because ResiPro received only "an 'easy' permit for [the] job." Goddard and his supervisor knew that their Easy Permit did not cover the scope of work performed at the property.

From: Scott Goddard <sgoddard@resipro.com>
Sent: Friday, January 31, 2020 1:49 PM CST
To: Matt Bannon <mbannon@resipro.com>
CC: Ray Blake <rblake@rrplumbingtechs.com>
Subject: Re: Estimate needed (Matt Bannon's Mail)

Matt,

We could Matt, I was just worried if we did, they'd start poking around on our inside work. We do have an "easy" permit for this job, but that's all. I'm open for suggestions.

Scott Goddard | Project Manager | Chicago

ResiPro

219.308.5894 (M)

E-mail: sgoddard@resipro.com

Website: www.resipro.com

CONFIDENTIALITY NOTICE:

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On Thu, Jan 30, 2020 at 7:18 PM Matt Bannon <mbannon@resipro.com> wrote:

Why can't we just pull a permit?

We weren't pulling one before because we didn't know about the service work.

On Thu, Jan 30, 2020 at 7:16 PM Ray Blake <rblake@rrplumbingtechs.com> wrote:

Ok with breaking sidewalk and working in park way , in chicago , we would have to contact digger for utility locates before digging , and will require machinery on the street . No way we are getting away with out a permit here and We can't work in the parkway of chicago because it goes into a whole different Bond needed with the city in which we don't have for parkways and streets . Sorry guys can't help on this one

118. The additional examples below are illustrative of ResiPro's work exceeding the scope of the Easy Permits they obtained for Chicago properties.

119. Based on the incomplete response to the City's subpoena, the City alleges on information and belief that Defendants similarly filed false Easy Permit applications and failed to obtain the required permits on the properties listed in Appendix B.

i. 10632 South Prairie Avenue

120. 10632 South Prairie Avenue is a single-family home in Hyde Park. ResiPro completed renovations on the property between November 6, 2019 and December 31, 2019.

121. In the initial estimate that Defendants provided to its client, Defendants indicated that the total cost of renovations for the property would be \$53,876.21. The initial estimate included, among other items, the following skilled work:

- a. A complete rewiring of the electrical system for the house “due to two-wire, ungrounded, receptacles [sic];”
- b. A complete re-plumbing of the house “due to old galvanized pipes.”

122. Defendants contracted with US Bank National Association as trustee for LSF9 Master Participation Trust, the owner of the property, on October 1, 2019, to perform \$52,893.01 of construction work. Subsequent change orders on the property did not eliminate any of the work described above.

123. On October 9, 2019, ResiPro received an Easy Permit (#100845201) for “Replacing kitchen cabinets, bathroom tile, painting, baseboard, casing, [and] windows only.” ResiPro did not apply for or receive other permits for this renovation work.

124. ResiPro performed work beyond the scope allowed by an Easy Permit, including at minimum, installing new water supply lines, sewer plumbing lines, and electrical wiring.

125. Despite completing the Easy Permit application on October 8, 2019—over a week after contracting with the owner proposing to perform over \$50,000 of work—Permit Coordinator Daniela Guevara told the City on behalf of ResiPro that the value of the work performed was \$9,500:

CITY OF CHICAGO DEPARTMENT OF BUILDINGS																																					
Easy Permit Application																																					
USE BLACK INK— DO NOT WRITE IN SHADED AREA	<table border="1"> <thead> <tr> <th colspan="2"></th> <th colspan="2">HOLDS</th> </tr> <tr> <th>Y</th> <th>N</th> <th>Y</th> <th>N</th> </tr> </thead> <tbody> <tr> <td>Stop Order(s)</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Violations</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Landmark</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Special Admin' Hold</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Lakefront Prot'</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Flood Plain</td> <td></td> <td></td> <td></td> </tr> <tr> <td colspan="2">DATABASE VERIFIED BY</td> <td></td> <td></td> </tr> </tbody> </table>			HOLDS		Y	N	Y	N	Stop Order(s)				Violations				Landmark				Special Admin' Hold				Lakefront Prot'				Flood Plain				DATABASE VERIFIED BY			
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APPLICATION PERMIT NO #100845201H																																					
1 GENERAL INFORMATION																																					
Address (Please enter two if a corner property) 10632 S PRAIRIE																																					
Description of Proposed Work (In description provide number of dwelling units, number of stories, building use and description of parking. If this building is residential Condominium, submit a Condominium Association letter) KITCHEN CABINETS, BATHROOM TILE, PAINTING, BASEBOARDS, CASINGS, WINDOW																																					
Enter permit number if revision to an existing permit																																					
Cost of Construction \$9,500.00																																					

ResiPro did not disclose the more extensive work that they intended to complete.

126. The more extensive work that ResiPro completed at 10632 South Prairie obligated ResiPro to apply for more comprehensive permits and pay the correspondingly higher fees. Defendants' scope of work required them to acquire more expensive permits for skilled and complex work, including a roof repair permit (minimum of \$400), a patio repair permit (minimum of \$200), and a plumbing permit. ResiPro paid only \$175 for the Easy Permit premised on false statements.

127. According to Defendants' records, ResiPro completed over \$50,000 of construction work at the property in 55 days, finishing by the Project Completion Date so that the Project Manager could receive a bonus under Defendants' Incentive Program. By falsifying an Easy Permit application, ResiPro was able to receive a permit to hang in the window in 24 hours and to start renovations quickly.

128. Had Defendants applied for the proper permits for the scope of work, they also would have needed to hire licensed contractors. Further, the City would have scheduled an inspection to ensure that ResiPro's work was safe and up to Code.

ii. 6040 South Whipple Street

129. 6040 South Whipple Street is a single-family home in Gage Park. ResiPro completed renovations on the property in 2019.

130. Defendants contracted with the owner of the property, U.S. Bank, N.A., as Trustee for LSF10 Master Participation Trust, on April 10, 2019, to perform \$62,161.37 of renovation work.

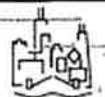
131. Between April 10, 2019 and May 31, 2019, the owner approved Defendants' change orders, increasing the total monetary value of work performed to \$76,071.49. The change orders included, among other items, the following work:

- a. Remove and repair 80 feet of gas steel piping
- b. Install and re-route gasline to stove, water heater, furnace, and dryer line.
- c. Replace electrical lines.

132. On May 10, 2019, ResiPro received an Easy Permit (#100819108) for "Replacing windows, doors, casings, tile, and kitchen cabinets" – the same scope of work listed on ResiPro's falsified Easy Permit for 10632 South Prairie Avenue.

133. The May 10 permit is the only permit on file for the property with the City.

134. Brittany Green, one of ResiPro's permit coordinators, falsely certified on the Easy Permit application that the cost of construction at the property was \$6,700, even though Defendants contracted with the owner for over \$60,000 one month before filing the application:

 CITY OF CHICAGO DEPARTMENT OF BUILDINGS	
Easy Permit Application	
USE BLACK INK — DO NOT WRITE IN SHADED AREA	HOLDS <input type="checkbox"/> Stop Order(s) <input type="checkbox"/> Violations <input type="checkbox"/> Special Admin Hold <input type="checkbox"/> Other
	APPLICATION PERMIT NO: 100819108
1 GENERAL INFORMATION	
Address (Please enter two if a corner property) <u>6040 S Whipple St</u>	
Description of Proposed Work (In description provide number of dwelling units, number of stories, building use and description of parking. If this building is Residential Condominium, submit a Condominium Association letter.) <u>doors, baseboards, casings, paint, tile, kitchen cabinets, windows,</u>	
Enter permit number if revision to an existing permit	
Cost of Construction <u>\$175</u>	

135. As expected for a project of this scope and size, several of the work items were beyond the scope allowed by an Easy Permit, such as installing new gas lines and electrical wiring.

136. On May 24, 2019, Haggerty went to 6040 South Whipple Street and, upon viewing the electrical work, asked the Project Manager whether they were waiting on final City inspections. The Project Manager told Haggerty that ResiPro had obtained an Easy Permit that did not require inspections, and that ResiPro hung a full permit in the window in case anyone inquired about work being done at the property.

137. To receive the Easy Permit for 6040 South Whipple, ResiPro paid a \$175 permit fee and a \$50 zoning fee. Had ResiPro fully disclosed the scope of its work, Defendants would have needed to pay additional permit fees, including for an electrical permit.

iii. ResiPro Knowingly Submitted Identical Easy Permit Applications at Chicago Properties without Regard for the Scope of Work at Each Property

138. Evidencing a coordinated effort to evade permitting requirements, ResiPro often listed the exact same scope of work on the Easy Permit application regardless of the work that the institutional owners contracted with Defendants to perform. In addition to the examples above,

ResiPro listed an identical or near-identical scope of work on Easy Permit applications for the following properties:

- a. 11618 South Laflin Street
- b. 1408 East 72nd Street
- c. 1929 North Keystone Avenue
- d. 2231 North Menard Avenue
- e. 2235 South Sacramento Avenue
- f. 3636 West 58th Street
- g. 10915 South Avenue F
- h. 4420 North Meade Avenue
- i. 4525 North Beacon Street
- j. 5231 West Henderson Street
- k. 5327 West Congress Parkway
- l. 6848 South Kolin Avenue
- m. 8455 Martin L King Jr Drive
- n. 8928 South Bennett Avenue
- o. 9001 South Claremont Avenue
- p. 9130 South Claremont Avenue
- q. 1626 West 33rd Street
- r. 634 West Surf Street

139. ResiPro made false statements and certifications to the City about the scope of work performed in order to conceal their obligation to pay higher permit fees to the City and did so knowingly, to avoid the added time, expense, and investigations associated with proper permits.

C. RESIPRO REGULARLY FAILED TO USE LICENSED SUB-CONTRACTORS AS REQUIRED BY CITY LAW

140. Consistent with Defendants’ strategy of avoiding legal requirements to maximize profits, ResiPro failed to use licensed subcontractors on its renovation projects as required by the City’s laws.

141. The City maintains a rigorous licensing scheme for electrical, masonry, plumbing, and ventilation contractors. The work these tradespeople perform presents serious safety concerns for workers, neighbors, and occupants. The City therefore requires examinations and annual registrations for individuals performing work in these skilled trades within the City limits.

142. To stay under budget, ResiPro hired unlicensed general labor contractors to perform skilled electrical, plumbing, and other work for which they were not qualified.

143. Bill Stancato, a Project Manager whom ResiPro later promoted to Senior Project Manager, explained why he did not use licensed contractors. In a December 2019 email, Montell Burnette, an Asset Manager who worked for ResiCap when it did business as Ameritrust Residential, questioned Stancato about his budget for a project in Bloomingdale, Illinois. Stancato responded by explaining that his costs were high because he had to follow the law and use licensed sub-contractors for skilled trades work.

144. He explained that he would use general contractors for skilled trades work whenever he could get away with it to reduce costs, but he could not reduce his budget by hiring unlicensed contractors in the suburbs.

145. In another email in the same thread, Stancato stated: “If I don’t have to pull permits, Boom! I make our budget. . . [b]ut they aren’t Electricians or Plumbers.”

146. Evidencing knowledge of their wrongdoing, Defendants—including Senior Project Manager Matt Bannon—instructed Project Managers at a meeting on June 7, 2019 that they should

From: William Stancato <wstancato@ameritrustresidential.com>
 Sent: Thursday, December 20, 2018 10:31 AM
 To: 'Montell Burnette' <mburnette@ameritrustresidential.com>
 Cc: 'Richard Carr' <rcarr@ameritrustresidential.com>
 Subject: Re: 9803852566- 358 MAYO LN BLOOMINGDALE IL 60108

Hey Buddy,

I failed to mention to is that without these licensed electricians and plumbers I cannot even pull a permit. They have to come out and give a bid on our work plus whatever work extra is needed before they will even consider writing a letter of Intent To the city. And they need the LOI before they will even issue us a permit.

Trust me bro if there was any way around it and I could use my GL's for all of the small little stupid stuff and I didn't have to pull a permit by all means I will. These cities have us by the gonads basically so there is no way for me to get around it and less we don't pull permits. Some cities we can get away with not pulling the permits but some cities it's a must we do. If we try to work without a permit we get screwed like we did with Tang and get fined. And it cost Ameritrust Triple

William C Stancato | Project Manager - Illinois
 Ameritrust Residential Services 708-717-9608

email: wstancato@ameritrustresidential.com

Website: www.ameritrustresidential.com

instruct sub-contractors to falsely state that they were ResiPro employees if asked by City inspectors or neighbors.

147. ResiPro also often falsely listed licensed sub-contractors on permit applications even though ResiPro had no intention of using the licensees.

148. For example, in November 2018, Permit Coordinator Brittany Green emailed a group that included ResiPro's Area Manager for Wisconsin and Illinois to add an agenda item to an upcoming meeting: "using the same electrician and plumber on all permits and LOI [letter of intent] templates from those subs."

149. In May 2019, Senior Project Manager Bill Stancato wrote to ResiPro's permit coordinators to say that an electrical company was "willing to go on all of our permits and supply you both with a Letter of Intent."

150. Defendants briefly hired Chicago Permit Services (a permit expediting company licensed by the City of Chicago to apply for permits on behalf of third parties), to assist with some Chicago properties with significant violations. Sofia Simotas from Chicago Permit Services noted the issues with ResiPro's subcontractors. In July 2019, she wrote to ResiPro's Chicago-area supervisors expressing concerns about her work with the company. She wrote, "I cannot seem to get letters of intent from the subs. Half your sub[-contractor]s are not even licensed...Everything is a mess and no one seems to care."

151. Using unlicensed sub-contractors violates the Code and can result in unsafe work.

152. For example, Quality Control Manager Haggerty observed ResiPro using unlicensed plumbers and unlicensed electricians for work on a property located at 8831 South Michigan Avenue. Haggerty observed that the electrical work being performed at this property was sub-standard. The unlicensed electricians were using a flexible conduit when Chicago's

electrical code required rigid conduits. ResiPro covered up this work with drywall, so future residents and inspectors could not see the wiring.

153. Similarly, Defendants' records of work performed at 10034 South Emerald Avenue (discussed in Section III.C, above) do not show any payments made to a licensed electrician, even though ResiPro rewired the entire property after finding live electrical wires in the basement, which was flooded with water.

D. RESIPRO VIOLATED STOP WORK ORDERS ISSUED BY THE CITY

154. In addition to the deceptive practices described above that ResiPro used to avoid the City's regulations and efforts to ensure construction is done safely and to Code, ResiPro also blatantly violated the City's Stop Work Orders when City inspectors sought to rectify Defendants' illegal construction work.

155. For example, on September 11, 2018, the City issued a Stop Work Order after learning that ResiPro performed significant structural work without a permit at 3632 South Leavitt Street, a single-family home in McKinley Park. The City cited ResiPro for erecting new partitions and breaching first floor joists to create a stair opening without the appropriate permits.

156. Under the terms of the Stop Work Order at 3632 South Leavitt, ResiPro needed to apply for and receive the required permits. Because ResiPro's work affected the structural integrity of the home, ResiPro needed to submit full Standard Plan Review permits with architectural drawings. In May 2019, ResiPro began a permit application for the property in the Building Department's system, but ResiPro never submitted the application.

157. ResiPro tried to persuade an architect named Don Ely to sign off on old architectural drawings, to submit with a permit for the property at 3632 South Leavitt. Ely identified a number of problems, including that ResiPro was attempting to use original drawings from the construction for the renovation project. Not only was work missing from the drawings,

Ely noted, but the plans revealed a number of outstanding Code issues. The architect refused to stamp the drawings because of the problems he listed.

158. In July 2019, Senior Project Managers discussing the project at 3632 South Leavitt noted that the “property is completed and all we need is revised drawings.”

159. In August 2019, Senior Project Manager Russell Smith asked Permit Expediter Sofia Simotas whether her company could correct and stamp the existing architectural drawings. Instead of disclosing that the first architect ResiPro approached refused because the drawings were inaccurate, Smith explained that the architect who completed the drawings “was detained overseas outside US control.” Simotas refused to have her company’s architect stamp the existing inaccurate drawings.

160. On August 13, 2019, ResiPro’s Regional Manager Daniel Weitzenkamp instructed his subordinates to finish the project at 3632 South Leavitt. Specifically, Weitzenkamp told Haggerty and Project Manager Yuriy Sheikhevych to approve the property regardless of violations and “just get it off the books.”

161. Weitzenkamp also told Haggerty to remove any photos of the Stop Work Order from the portfolio that Defendants produced for the client so that the property owner would not know about the Stop Work Order.

162. To explain the delay in the completion date to the client, Project Manager Shelikhevych wrote in a Request for Delay from July 2019 that “architectural drawings are still under review at City of Chicago.” ResiPro never submitted drawings to the City.

163. ResiPro finished work on the project at 3632 South Leavitt without receiving any further permits or inspections by the City.

164. On information and belief, ResiCap was aware of the Stop Work Order because it was informed of all City enforcement actions and did not ensure that ResiPro complied with the order.

165. On information and belief, ResiPro violated Stop Work Orders at other locations throughout the City.

FIRST CAUSE OF ACTION
Violations of the Chicago Construction Codes
Against All Defendants

166. The City incorporates all preceding allegations as if they were set forth herein.

167. Section 14A-3-301.1 of the MCC provides that it is “unlawful for any person to alter, build, construct, demolish, erect, extend, maintain, occupy, relocate, remove, or use any structure or equipment regulated by the Chicago Construction Codes, or cause the same to be done, in conflict with or in violation of any provision of the Chicago Construction Codes.”

168. Defendants are liable for violations of the Codes at the properties identified in this complaint and on information and belief elsewhere because liability extends to “owners...and any other *person* managing or controlling a building or premises in any part of which there is a violation of the provisions of [the Code]... which may have existed or occurred, at or during the any time when such person is or was the person owning or managing, controlling, or acting as agent in regard to the building or premises.” MCC § 14A-3-301.2 (emphasis in original).

169. Defendants violated Section 14A-3-301.1 by performing work in violation of the Code, including:

- a. Renovating properties that required at least one permit without obtaining any permits or paying the associated permitting fees;

- b. Renovating properties without submitting required architectural plans and/or technical drawings for review by the Department of Buildings;
- c. Failing to post a Building Permit certificate at the work site location before beginning work and/or posting a permit certificate for the incorrect property;
- d. Installing, altering, or repairing electrical and plumbing systems or equipment on properties without obtaining the required permit or paying the associated fee;
- e. Installing or replacing warm air heating furnaces or connected ducts in properties without obtaining the required permit or paying the associated fees;
- f. Failing to arrange for City inspections;
- g. Exceeding the scope of the Easy Permits obtained;
- h. Contracting with unlicensed contractors to perform work requiring a trade license;
- i. Violating Stop Work orders.

170. Each violation of the Construction Codes is punishable by a fine. Each day that a violation continues to exist constitutes a separate and distinct offense and shall be assessed at not less than \$500 and not more than \$1,000 per violation, per day.

171. The City seeks the maximum fine for each day that Defendants maintained properties in Chicago in violation of the Municipal Code and the injunctive relief described below.

172. WHEREFORE, the City respectfully requests that this Court enter an order (a) awarding judgment in the City's favor on its First Cause of Action; (b) declaring that Defendants

have violated MCC § 14A-3-301.1; (c) assessing Defendants fines as provided under Tables 14A-12-1203.1 and -1203.2, per day, at each property identified in the complaint or through discovery and as proven at trial; (d) enjoining Defendants from performing renovation and construction work in the City of Chicago, pending compliance with the Code; and (e) awarding such other, further, and different relief as this Court deems reasonable and just.

SECOND CAUSE OF ACTION
Violation of General Contractors Ordinance
Against Defendant ResiPro, LLC

173. The City incorporates all preceding allegations as if they were set forth herein.

174. Section 4-36-120 of the Municipal Code requires general contractors “to assure compliance with the building code by its employees, agents, and subcontractors in the performance of a project.”

175. ResiPro was the general contractor on the properties identified in this complaint.

176. ResiPro failed to assure compliance with the Building Code because Building Code violations existed and may continue to exist at the properties identified in this complaint.

177. Section 4-36-190 provides that any person who violates the General Contractors Ordinance shall be fined \$1,000 per offense. Each day that a violation continues shall constitute a separate and distinct offense.

178. WHEREFORE, the City respectfully requests that this Court enter an order (a) awarding judgment in the City’s favor on its Second Cause of Action; (b) declaring that Defendants have violated MCC § 4-36-120; (c) assessing Defendants per-day, per-property fines in an amount to be proven at trial; (d) awarding the City reasonable attorneys’ fees and costs; (e) revoking any and all general contractors licenses held by ResiPro in the City of Chicago; (f) revoking any and

all permits issued to ResiPro in the City of Chicago; and (g) awarding such other, further, and different relief as this Court deems reasonable and just.

THIRD CAUSE OF ACTION
Violation of MCC § 2-25-090
Against All Defendants

179. The City incorporates all preceding allegations as if they were set forth herein.

180. Section 2-25-090 of the Municipal Code prohibits “any act of consumer fraud, unfair method of competition, or deceptive practice while conducting any trade or business in the city.”

181. Defendants have engaged in deceptive acts and practices while conducting their renovation and construction business in Chicago, in violation of MCC § 2-25-090. Specifically, Defendants violated MCC § 2-25-090 by:

- a. Omitting work items from Easy Permit applications in order to obtain less costly and time-intensive building permits from the City;
- b. Posting false permits in property windows in order to mislead neighbors and City officials as to the lawfulness of the construction activities at the property;
- c. Falsely listing licensed sub-contractors on building permit applications when Defendants knew those sub-contractors would not do the permitted work, in order to falsely represent the work as having been done by licensed trade professionals;
- d. Through the above practices, causing property tenants and buyers to misapprehend rehabilitated properties as having been constructed safely and in compliance with the Code.

182. Defendants have also engaged in unfair practices while conducting their home rehabilitation business in Chicago, in violation of MCC § 2-25-090. These practices are unfair in that they offend public policy; are immoral, unethical, oppressive, and unscrupulous; and/or cause substantial injury to consumers. As alleged herein, these methods include the following:

- a. Falsifying the scope of work to be done on properties on Easy Permit applications;
- b. Performing construction on properties without receiving the appropriate permits, paying required permitting fees, and/or scheduling the required inspections;
- c. Displaying permits pertaining to other properties;
- d. Using unlicensed and unqualified sub-contractors to do electrical, plumbing, and other major work on properties;
- e. Violating Stop Work orders;
- f. Through the above practices, violating the Construction Codes which in turn is a violation of Section 2-25-090 because the Code relates to “business operations and consumer protection.”

183. Defendants’ circumvention of Code requirements related to permitting, inspections, and using licensed contractors offends public policy. Defendants’ actions frustrate the Building Department’s mission to enhance safety and quality of life for Chicago’s residents and visitors through permitting, inspections, trade licensing, and code enforcement and place Defendants on an uneven playing field with other residential developers.

184. Defendants' practices substantially harm consumers because they can create unsafe living conditions of which residents are unaware and pass the cost of future remedial work on to buyers.

185. Defendants' practices are immoral, unethical, and unscrupulous because they can create unsafe living conditions for residents, unfairly pass on remedial costs to future owners, and unfairly create a competitive advantage for Defendants vis-à-vis other residential property developers.

186. The MCC provides that any person "who violates any of the requirements of this section shall be subject to a fine of not less than \$500.00 nor more than \$10,000.00 for each offense." MCC § 2-25-090(f). The City is therefore entitled to fines for each violation of MCC § 2-25-090.

187. The MCC also authorizes the City's Corporation Counsel to bring an action for injunctive relief and other equitable relief. MCC § 2-25-090(e)(4). The City is entitled to injunctive and equitable relief as described below.

188. WHEREFORE, the City respectfully requests that this Court enter an order (a) awarding judgment in the City's favor on its Third Cause of Action; (b) declaring that Defendants have violated MCC § 2-25-090; (c) enjoining Defendants from engaging in further deceptive acts and unfair practices in violation of MCC § 2-25-090; (d) assessing Defendants fines of \$10,000 for each offense under MCC § 2-25-090; (e) requiring Defendants to pay restitution to consumers; (f) requiring Defendants to disgorge profits; and (g) awarding such other, further, and different relief as this Court deems reasonable and just.

FOURTH CAUSE OF ACTION
Violation of the False Claims Ordinance
Against Defendant ResiPro, LLC

189. The City incorporates all preceding allegations as if they were set forth herein.

190. The False Claims Ordinance provides that any person who knowingly makes a false claim to the City “is liable to the city for a civil penalty of not less than \$5,000.00 and not more than \$10,000.00, plus three times the amount of damages which the city sustains because of the act of that person.” MCC § 1-22-020(a).

191. A person makes a false claim when, for example, the person “knowingly presents, or causes to be presented, to an official or employee of the city a false or fraudulent claim for payment or approval,” “knowingly makes, uses, or causes to be made or used, a false record or statement to get a false or fraudulent claim paid or approved by the city,” or “knowingly makes, uses, or causes to be made or used, a false record or statement to conceal, avoid or decrease an obligation to pay or transmit money or property to the city.” *Id.*

192. Defendant ResiPro knowingly made false claims in violation of MCC § 1-22-030, including by:

- a. Falsifying and minimizing the scope of work on Easy Permit applications submitted to the City to decrease the amount of permit fees owed and to ensure that its permit applications were approved;
- b. Certifying on Easy Permit applications submitted to the City that the statements in those applications describing the scope of work and estimated cost of construction were true, when ResiPro knew those statements were false based on construction contracts they had already signed with property owners.

- c. Listing licensed sub-contractors on building permit applications when those sub-contractors had agreed to be on permits but had not contracted to perform the scope of work and without any investigation into whether those licensed sub-contractors would perform the work.

193. Defendant ResiPro is liable to the City for a \$5,000 to \$10,000 penalty for each false claim made to the City, in addition to three times the amount of the damages that the City sustained, as well as litigation and collection costs, and attorneys' fees.

194. WHEREFORE, the City respectfully requests that the Court enter an order (a) awarding judgment in the City's favor on its Fourth Cause of Action; (b) declaring that Defendant ResiPro violated MCC § 1-22-020(a); (c) assessing ResiPro fines of \$10,000 for each false claim made to the City; (d) awarding the City the costs of its investigation and suit, including reasonable attorneys' fees and costs; (e) assessing ResiPro three times the amount of damages sustained by the City, in an amount to be proven at trial; and (f) awarding such other, further, and different relief as this Court deems reasonable and just.

FIFTH CAUSE OF ACTION
Violation of the False Statements Ordinance
Against All Defendants

195. The City incorporates all preceding allegations as if they were set forth herein.

196. The False Statements Ordinance provides that any person who knowingly makes a false statement of material fact to the city in violation of any ordinance or regulation or in connection with any application "is liable to the city for a civil penalty of not less than \$500.00 and not more than \$1,000.00, plus up to three times the amount of damages which the city sustains[.]" MCC § 1-21-010(a).

197. A person makes a false statement of material fact when a person makes the statement with “actual knowledge that the statement was false, “with knowledge of facts or information that would cause a reasonable person to be aware that the statement was false when it was made,” or “signs...or causes any other person to sign... that a statement of material fact is true or accurate in deliberate ignorance or reckless disregard of the truth or falsity of the statement.” A person who “fails to make a reasonable investigation... acts in deliberate ignorance or reckless disregard[.]” MCC § 1-21-010(d).

198. Defendant ResiPro knowingly made false statements in violation of MCC § 1-21-010, including by:

- a. Falsifying and minimizing the scope of work on Easy Permit applications submitted to the City to decrease the amount of permit fees owed and to ensure that its permit applications were approved;
- b. Certifying on Easy Permit applications submitted to the City that the statements in those applications describing the scope of work and estimated cost of construction were true, when ResiPro knew those statements were false based on construction contracts they had already signed with property owners;
- c. Listing licensed sub-contractors on building permit applications when those sub-contractors had agreed to be on permits but had not contracted to perform the scope of work and without any investigation into whether those licensed sub-contractors would perform the work;
- d. Making false statements on permit applications in violation of the Code.

199. “Any person who aids, abets, incites, compels, or coerces” a violation of the False Statements Ordinance “shall be liable to the city for the same penalties for the violation.” MCC § 1-21-020. ResiCap, LP aided and abetted ResiPro’s false statements by authorizing ResiPro workers to apply for permits on the company’s behalf, including by attaching written consent forms attached to permit applications. ResiCap, LP knew or should have known that ResiPro falsified permits because it controlled many aspects of ResiPro’s work, including by setting and/or approving budgets for each project, and it was aware of many Code enforcement proceedings brought by municipalities because of ResiPro’s failure to get the appropriate permits.

200. Defendants are liable to the City for a \$500 to \$1,000 penalty for each false statement made to the City, in addition to three times the amount of the damages that the City sustained, as well as litigation and collection costs, and attorneys’ fees.

201. WHEREFORE, the City respectfully requests that the Court enter an order (a) awarding judgment in the City’s favor on its Fifth Cause of Action; (b) declaring that Defendants MCC § 1-21-010; (c) assessing Defendants fines of \$1,000 for each false statement made to the City; (d) awarding the City the costs of its investigation and suit, including reasonable attorneys’ fees and costs; (e) assessing Defendant three times the amount of damages sustained by the City, in an amount to be proven at trial; and (f) awarding such other, further, and different relief as this Court deems reasonable and just.

JURY DEMAND

202. The City requests a trial by jury of all claims.

Dated: May 4, 2022

Respectfully submitted,

Celia Meza
Corporation Counsel of the City of Chicago

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APPENDIX A
No-permit properties

10034 S EMERALD AVE CHICAGO IL 60628
10123 S YALE AVE CHICAGO IL 60628
10130 S TORRENCE AVE CHICAGO IL 60617
1040 W 92ND PL CHICAGO IL 60620
10929 S AVE O CHICAGO IL 60617
10945 S EWING AVE CHICAGO IL 60617
11141 S GREEN BAY AVE CHICAGO IL 60617
12122 S THROOP ST CHICAGO IL 60643
12348 S PERRY AVE CHICAGO IL 60628
1255 S STATE ST 1703 CHICAGO IL 60605
12908 S GREEN ST CHICAGO IL 60643
12927 S NORMAL AVE CHICAGO IL 60628
1301 W 112TH ST CHICAGO IL 60643
13232 S CARONDOLET AVE CHICAGO IL 60633
1334 W GREENLEAF AVE 3C CHICAGO IL 60626
1402 W 110TH PL CHICAGO IL 60643
1420 E 73RD ST E1 CHICAGO IL 60619
1434 S KARLOV AVE CHICAGO IL 60623
1442 W 105TH ST CHICAGO IL 60643
1500 W MONROE ST APT. 402 CHICAGO IL 60607
1500 W MONROE ST APT. 615 CHICAGO IL 60607
1538 W ASHER ST APT. B CHICAGO IL 60643
1723 W TOUHY AVE APT 4 CHICAGO IL 60626
175 E DELAWARE PL APT. 5605 CHICAGO IL 60611
1830 N LUNA AVE CHICAGO IL 60639
1846 N NASHVILLE AVE CHICAGO IL 60707
2140 W HURON ST APT 1F CHICAGO IL 60612
2216 E 70TH ST UNIT 2 CHICAGO IL 60649
2301 W MORSE AVE UNIT 1E CHICAGO IL 60645
2317 S HAMLIN AVE FLR CHICAGO IL 60623
2318 E 96TH ST CHICAGO IL 60617
233 E ERIE ST #2302 CHICAGO IL 60611
2605 S INDIANA AVE 1506 CHICAGO IL 60616
2608 N MEADE AVE CHICAGO IL 60639
2718 W WASHINGTON BLVD CHICAGO IL 60612
2772 E 75TH ST UNIT 4HN CHICAGO IL 60649
2800 N PINE GROVE AVE 5E CHICAGO IL 60657
2846 W 39TH PL CHICAGO IL 60632

2848 E 98TH ST CHICAGO IL 60617
3217 W BRYN MAWR AVE APT 401 CHICAGO IL 60659
3321 W 61ST PL CHICAGO IL 60629
3330 N OCONTO AVE CHICAGO IL 60634
3349 N PITTSBURGH AVE CHICAGO IL 60634
3359 S INDIANA AVE CHICAGO IL 60616
3419 N KEDZIE AVE CHICAGO IL 60618
3632 S LEAVITT ST CHICAGO IL 60609
3748 W 82ND ST CHICAGO IL 60652
3822 W 80TH ST CHICAGO IL 60652
3841 W POLK ST CHICAGO IL 60624
3849 S ELLIS AVE E1-302 CHICAGO IL 60653
3853 E 110TH ST CHICAGO IL 60617
415 W 99TH PL CHICAGO IL 60628
4219 W 76TH ST APT. 305 CHICAGO IL 60652
4233 W 76TH ST UNIT 202 CHICAGO IL 60652
4245 W 78TH ST CHICAGO IL 60652
4263 W 81ST ST CHICAGO IL 60652
4281 W 76TH ST UNIT 406 CHICAGO IL 60652
429 W 110TH ST CHICAGO IL 60628
4300 W FORD CITY DR A-509 CHICAGO IL 60652
4303 S KEATING AVE CHICAGO IL 60632
435 E 88TH PL CHICAGO IL 60619
4435 S KARLOV AVE CHICAGO IL 60632
450 E BOWEN AVE APT 1W CHICAGO IL 60653
4608 S AVERS AVE CHICAGO IL 60632
4637 W PARKER AVE CHICAGO IL 60639
4648 N WINTHROP AVE CHICAGO IL 60640
4736 S UNION AVE CHICAGO IL 60609
4835 N HARLEM AVE APT 1 CHICAGO IL 60656
5126 W WABANSIA AVE CHICAGO IL 60639
5128 N MELVINA AVE CHICAGO IL 60630
5212 S KILDARE AVE CHICAGO IL 60632
5213 S INGLESIDE AVE APT 2R CHICAGO IL 60615
5300 N MOBILE AVE CHICAGO IL 60630
5320 N KENMORE AVE CHICAGO IL 60640
5323 S MAPLEWOOD AVE CHICAGO IL 60632
5721 S KILDARE AVE CHICAGO IL 60629
5730 S ARTESIAN AVE CHICAGO IL 60629
5815 W FOSTER AVE CHICAGO IL 60630
6152 S AUSTIN AVE CHICAGO IL 60638

6213 W 55TH ST CHICAGO IL 60638
6231 S FRANCISCO AVE CHICAGO IL 60629
6325 S KARLOV AVE CHICAGO IL 60629
6429 S MORGAN ST CHICAGO IL 60621
6430 W BELLE PLAINE AVE UNIT 506 CHICAGO IL 60634
6439 S FRANCISCO AVE CHICAGO IL 60629
6500 N RIDGE BLVD APT 4C CHICAGO IL 60626
655 W IRVING PARK RD #3910 CHICAGO IL 60613
6559 W GEORGE ST UNIT 510 CHICAGO IL 60634
6732 S OAKLEY AVE CHICAGO IL 60636
6930 N SHERIDAN RD UNIT 1 CHICAGO IL 60626
6950 W NELSON ST CHICAGO IL 60634
719 N LOREL AVE CHICAGO IL 60644
7203 S MAPLEWOOD AVE CHICAGO IL 60629
7203 S YATES BLVD 4A CHICAGO IL 60649
7219 S TROY ST CHICAGO IL 60629
7344 S KENWOOD AVE CHICAGO IL 60619
7349 N RIDGE BLVD #3B CHICAGO IL 60645
7705 S SPAULDING AVE CHICAGO IL 60652
7921 S GREENWOOD AVE CHICAGO IL 60619
7925 S DOBSON AVE CHICAGO IL 60619
7956 S TRUMBULL AVE CHICAGO IL 60652
8000 S WHIPPLE ST CHICAGO IL 60652
8020 S PERRY AVE CHICAGO IL 60620
8032 S CARPENTER ST CHICAGO IL 60620
824 E 38TH PL D3105 CHICAGO IL 60653
8346 S HERMITAGE AVE CHICAGO IL 60620
854 W VERMONT ST CHICAGO IL 60643
8605 S HONORE ST CHICAGO IL 60620
8631 S KOSTNER AVE CHICAGO IL 60652
8731 S ADA ST CHICAGO IL 60620
8831 S MICHIGAN AVE CHICAGO IL 60619
9006 S MORGAN ST CHICAGO IL 60620
9029 S CRANDON AVE CHICAGO IL 60617
917 N CICERO AVE CHICAGO IL 60651
9231 S EUCLID AVE CHICAGO IL 60617
9630 S FOREST AVE CHICAGO IL 60628
9641 S HALSTED ST CHICAGO IL 60628
9745 S WENTWORTH AVE CHICAGO IL 60628
719 N LOREL AVE CHICAGO IL 60644
4201 W 79TH ST CHICAGO IL 60652

APPENDIX B

Properties for which work performed exceeded scope of Easy Permit

10632 S PRAIRIE AVE CHICAGO IL 60628
10750 SOUTH KING DR CHICAGO IL 60628
10915 S AVENUE F CHICAGO IL 60617
11618 S LAFLIN ST CHICAGO IL 60643
1225 W MORSE AVE UNIT 201 CHICAGO IL 60626
1408 E 72ND ST CHICAGO IL 60619
1626 W 33RD ST CHICAGO IL 60608
1723 W FARWELL AVE CHICAGO IL 60626
1929 N KEYSTONE AVE CHICAGO IL 60639
1937 N NORMANDY AVE CHICAGO IL 60707
2052 W 108TH PL CHICAGO IL 60643
2231 N MENARD AVE CHICAGO IL 60639
2234 S KEELER AVE CHICAGO IL 60623
2235 S SACRAMENTO AVE CHICAGO IL 60623
2738 W GLADYS AVE CHICAGO IL 60612
2917 N MANGO AVE CHICAGO IL 60634
3007 W BELLE PLAINE AVE CHICAGO IL 60618
3008 N ODELL AVE CHICAGO IL 60707
335 W 42ND ST CHICAGO IL 60609
3636 W 58TH ST CHICAGO IL 60629
4404 S HOMAN AVE CHICAGO IL 60632
4420 N MEADE AVE CHICAGO IL 60630
4525 N BEACON ST CHICAGO IL 60640
4531 S DREXEL BLVD UNIT 2 CHICAGO IL 60651
5231 W HENDERSON ST CHICAGO IL 60641
5327 W CONGRESS PARKWAY CHICAGO IL 60644
6040 S WHIPPLE ST CHICAGO IL 60629
6304 N NAVAJO AVE CHICAGO IL 60646
634 W SURF ST CHICAGO IL 60657
6565 S HARVARD AVE CHICAGO IL 60621
6606 S KENNETH AVE CHICAGO IL 60629
6801 S CRANDON AVE APT 2 CHICAGO IL 60649
6848 S KOLIN AVE CHICAGO IL 60629
8137 S OGLESBY AVE CHICAGO IL 60617
8455 S MARTIN L KING DR CHICAGO IL 60619
8928 S BENNETT AVE CHICAGO IL 60617
9001 S CLAREMONT AVE CHICAGO IL 60620
9130 S CLAREMONT AVE CHICAGO IL 60643

9609 S GENOA AVE CHICAGO IL 60643
10101 S PEORIA ST CHICAGO IL 60643
1145 S MASON AVE CHICAGO IL 60644
149 W 74TH ST CHICAGO IL 60621
2018 E 73RD ST CHICAGO IL 60649
4249 N CENTRAL PARK AVE CHICAGO IL 60618
4855 S WOLCOTT AVE CHICAGO IL 60609
525 E 87TH PL CHICAGO IL 60619
5415 S FAIRFIELD AVE CHICAGO IL 60632
7315 S PRINCETON AVE CHICAGO IL 60621
6035 S LOOMIS BLVD CHICAGO IL 60636
8048 S MARSHFIELD AVE CHICAGO IL 60620
910 N KEYSTONE AVE CHICAGO IL 60651
3648 N NORDICA AVE CHICAGO IL 60634