

**IN THE CIRCUIT COURT OF COOK COUNTY  
FIFTH MUNICIPAL DISTRICT**

|                                                      |   |                           |
|------------------------------------------------------|---|---------------------------|
| Village of Orland Park,                              | ) |                           |
|                                                      | ) |                           |
| Plaintiff,                                           | ) |                           |
|                                                      | ) | Case No.                  |
| v                                                    | ) |                           |
|                                                      | ) |                           |
| The Land Trust Company successor trustee to First    | ) |                           |
| National Bank of Evergreen Park as Trustee under the | ) |                           |
| provisions of a Trust agreement dated September 6,   | ) |                           |
| 1984 known as Trust Number 8093, Fifth Third Bank,   | ) |                           |
| an AMO Banking Corporation, Non-Record               | ) | 15151 South Harlem Avenue |
| Claimants, Unknown Occupants and                     | ) | Orland Park, Illinois     |
| Unknown Owners,                                      | ) |                           |
| Defendants.                                          | ) |                           |

**COMPLAINT**

Plaintiff, Village of Orland Park, Illinois ("Village"), by its attorneys, Ancel Glink, petitions this Court to have the property ("Property") described herein declared abandoned pursuant to 65 ILCS 5/11-31-1(d). In support of this complaint, the Village states as follows:

1. The Property is commonly known as 15151 South Harlem Avenue, Orland Park, Illinois and is legally described in Exhibit A incorporated herein by reference

2. The Property has been abandoned by its owner and is currently in a dangerous condition. See affidavit of Jason Ziegler attached hereto as Exhibit B and incorporated herein by reference.

3. The Village brings this action seeking an order declaring the Property abandoned pursuant to 65 ILCS 5/11-31-1(d).

4. The Land Trust Company successor trustee to First National Bank of Evergreen Park, as Trustee under the provisions of a Trust agreement dated September 6, 1984 known as Trust Number 8093, Fifth Third Bank, an Ohio Banking Corporation, non-record claimants, unknown occupants and unknown owners (collectively "Defendants") are the owners of record, beneficial owners, lien holders or are otherwise interested in the Property.

5. The unknown owners, unknown occupants and non-record claimants in this matter are all persons who may own or hold a property interest in the Property who the Village has been unable to identify and locate.

6. The Village seeks an order declaring the Property abandoned pursuant to 65 ILCS 5/11-31-1(d) of the Municipal Code which provides, in part:

(d) In addition to any other remedy provided by law, the corporate authorities of any municipality may petition the circuit court to have property declared abandoned under this subsection (d) if:

- (1) the property has been tax delinquent for 2 or more years or bills for water service for the property have been outstanding for 2 or more years;
- (2) the property is unoccupied by persons legally in possession; and
- (3) the property's condition impairs public health, safety or welfare for reasons specified in the affidavit attached hereto as Exhibit B.

7. The Property is unoccupied.

8. The real estate taxes on the Property have been unpaid for two or more years. See Exhibit C attached hereto and incorporated herein by reference.

9. Consequently, the elements of 65 ILCS 5/11-31-1(d) are satisfied, and the Village is entitled to an order declaring the Property abandoned.

**WHEREFORE**, Plaintiff respectfully requests that this Court enter an order for the following relief:

1. Declaring the Property abandoned pursuant to 65 ILCS 5/11-31-1(d);
2. Issuing a judicial deed for the Property in favor of the Village, pursuant to 65 ILCS 5/11-31-1(d) which will extinguish all previously existing ownership interests in, liens on, and other interests in the Property, including taxes; and

For such other relief as this Court deems appropriate.

Village of Orland Park, Illinois,

By: Mark H. Sterk  
One of the Village's attorneys

Mark H. Sterk  
Michael B. Stillman  
Kevin L. Sterk  
Ancel Glink  
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[ksterk@ancelglink.com](mailto:ksterk@ancelglink.com)

### **CERTIFICATION**

Under penalties as provided by law pursuant to 735 ILCS Section 5/1-109, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

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Jason Ziegler

**EXHIBIT A**  
**LEGAL DESCRIPTION**

THE WEST 570.00 FEET OF THE SOUTH 205.00 FEET OF THE NORTH 238.00 FEET OF THE FOLLOWING DESCRIBED PARCEL TAKEN AS A TRACT; THE WEST  $\frac{1}{2}$  OF THE NORTHWEST  $\frac{1}{4}$  OF SECTION 18, TOWNSHIP 36 NORTH. RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS, EXCEPT THE NORTH 22 ACRES THEREOF AND EXCEPT THAT PART, IF ANY, FALLING SOUTH OF THE SOUTH LINE OF THE NORTH 22 ACRES THEREOF AND NORTH OF THE SOUTH LINE OF THE NORTH 793.68 FEET THEREOF AND ALSO EXCEPT THE SOUTH 40- $\frac{3}{4}$  ACRES OF THE WEST  $\frac{1}{4}$  OF THE NORTHWEST  $\frac{1}{4}$  OF SAID SECTION, AND EXCEPT THE WEST 40.00 FEET THEREOF TAKEN FOR HARLEM AVE, ALL IN COOK COUNTY, ILLINOIS

PINs: 28-18-100-010-0000

Address: 15151 South Harlem Avenue, Orland Park, Illinois 60462

## EXHIBIT B

### IN THE CIRCUIT COURT OF COOK COUNTY FIFTH MUNICIPAL DISTRICT

|                                                      |   |                           |
|------------------------------------------------------|---|---------------------------|
| Village of Orland Park,                              | ) |                           |
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| provisions of a Trust agreement dated September 6,   | ) |                           |
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| Claimants, Unknown Occupants and                     | ) | Orland Park, Illinois     |
| Unknown Owners,                                      | ) |                           |
| Defendants.                                          | ) |                           |

### AFFIDAVIT OF JASON ZIEGLER

I, Jason Ziegler, being sworn and under oath, states that I am over the age of 18 and of sound mind, that I have personal knowledge of the facts contained herein and if called as a witness, would competently testify to the following:

1. I am employed by the Village of Orland Park as the Code Enforcement Supervisor.
2. Based on my inspections of the property that is the subject of this case ("Property"), I have determined that the Property impairs public health, safety or welfare for the following reasons:

- A. The Property is littered with garbage and debris in violation of 6-2-2-4(4) of the Village Code.
- B. The Property has extensive grass and weeds in violation of Section 6-2-2-7(2) of the Village Code.
- C. There is an unsanitary building on the Property in violation of 6-6-2-3(6) of the Village Code.

- D. There is a dangerous building on the Property in violation of 6-6-2-3(8) of the Village code.
- E. The aforementioned building is an unsafe structure in danger of collapse in violation of Section 1-108.1.1 of the International Property Maintenance Code.
- F. There are vacant structures located on the Property, and they are not being maintained in a clean, safe, secure and sanitary condition in violation of Section 3-01.3 of the International Property Maintenance Code.

3. Based on my inspections of the Property, I have determined that the Property is unoccupied by persons legally in possession.

Further Affiant sayeth further naught.

---

Jason Ziegler

Subscribed to and Sworn to before  
me this \_\_\_\_ day of December 2025

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Notary Public