

Return Date: No return date scheduled
Hearing Date: No hearing scheduled
Courtroom Number: No hearing scheduled
Location: No hearing scheduled

FILED
1/17/2020 3:06 PM
DOROTHY BROWN
CIRCUIT CLERK
COOK COUNTY, IL
2016CH15489

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

LEILA MENDEZ and ALONSO ZARAGOZA,)	
)	
Plaintiffs,)	8131924
)	Case No. 16 CH 15489
v.)	
)	Judge Sanjay T. Tailor
)	
CITY OF CHICAGO, et al.,)	
)	
Defendants.)	
)	

**PLAINTIFFS' COMBINED REPLY IN SUPPORT OF
MOTION FOR SUMMARY JUDGMENT AND
RESPONSE TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Jeffrey Schwab (#6290710)
Liberty Justice Center
Cook County No. 49098
190 S. LaSalle Street, Suite 1500
Chicago, Illinois 60603
(312) 263-7668
(312) 263-7702 (fax)
jschwab@libertyjusticecenter.org

Jacob Huebert (#6305339)
Timothy Sandefur
(#6325089/pro hoc vice #61192)
Christina Sandefur
(#6325088/pro hac vice #61186)
Goldwater Institute
500 East Coronado Road
Phoenix, Arizona 85004
(602) 462-5000
(602) 256-7045 (fax)
litigation@goldwaterinstitute.org

FILED DATE: 1/17/2020 3:06 PM 2016CH15489

I. Plaintiffs have standing as taxpayers.

As this Court has repeatedly recognized, Plaintiffs have standing to bring their claims because they are injured as Chicago taxpayers when the City uses their tax dollars to administer or enforce an unconstitutional ordinance. *See* Order on Defendants’ Motion to Dismiss Plaintiffs’ Complaint (Oct. 13, 2017) (“MTD Order”); Order on Defendant’s Motion to Dismiss Plaintiffs’ Amended Complaint (Apr. 2, 2018).

As this Court stated, the “[i]llegal use of public funds is a special injury to taxpayers that may bestow standing” on them. MTD Order at 4. “It has long been the rule in Illinois that ... taxpayers have a right to enjoin the misuse of public funds”—*i.e.*, that “[t]he misuse of [public] funds for illegal or unconstitutional purposes is a damage which entitles [taxpayers] to sue.” *Barco Mfg. Co. v. Wright*, 10 Ill. 2d 157, 160 (1956). And the Illinois Supreme Court has long held that the use of public funds to administer an unconstitutional provision of law is a “misuse of public funds” that taxpayers have standing to challenge. *See Snow v. Dixon*, 66 Ill. 2d 443, 449-52 (1977) (taxpayer had standing to enjoin use of public resources to collect illegal tax); *Krebs v. Thompson*, 387 Ill. 471, 473 (1944) (taxpayer had standing to challenge licensing law for engineers because state used public funds to administer it); *see also Crusius v. Ill. Gaming Bd.*, 348 Ill. App. 3d 44, 51 (1st Dist. 2004) (taxpayer had standing to challenge statute regarding gambling licenses because state used public funds to administer it). The misuse of public funds injures taxpayers because they are the funds’ “equitable owners” and will, by definition, be “liab[le] to replenish” treasury funds after they are spent. *Barco*, 10 Ill. 2d at 160.

Here, it is not disputed that Plaintiffs pay property taxes in Chicago. *See* Ex. P, Pls.’ Objs.

& Answers To Defs.’ First Set of Requests to Admit No. 9.¹ Nor is it disputed that the City uses general revenue funds—*i.e.*, Plaintiffs’ tax dollars, which they are liable to replenish—to implement the Ordinance. *See* Ex. Q, City’s Answer to Am. Compl. ¶ 59. Therefore, under longstanding Illinois precedents, Plaintiffs have alleged an injury that establishes their standing.

There is no merit in Defendants’ arguments that taxpayer plaintiffs must allege that the provisions they challenge will cause the City to spend more money than it otherwise would. *See* Defs.’ MSJ at 9-10. The Illinois Supreme Court has repeatedly held that taxpayers have standing to challenge the use of public funds to administer an unconstitutional statute even if it generates a “profit” for the government. For example, in *Snow*, the Court held that taxpayers had standing to challenge the use of public funds to collect an illegal tax even though the tax allegedly only cost a “de minimis” amount to collect but generated millions in revenue. 66 Ill. 2d at 450-51; *see also Krebs*, 387 Ill. at 474-76 (taxpayer had standing regardless of whether fees statute generated would “result in a net profit to the State”).

This Court applied these precedents in its order on the City’s previous motion to dismiss and concluded that Plaintiffs have standing to bring their claims. MTD Order at 4-5. The City has presented no grounds for the Court to reconsider that conclusion, and it should not do so.

II. Plaintiffs have brought a good-faith Uniformity Clause challenge.

Contrary to Defendants’ argument, Plaintiffs have brought a good-faith Uniformity Clause challenge because this case involves two distinct classes of taxpayers whom the City treats differently: (1) guests of shared-housing units or vacation rentals; and (2) guests of hotels.

¹ In addition, evidence of Plaintiffs’ payment of property taxes in Chicago is available by searching the Cook County Treasurer’s records for their addresses—respectively, 1530 W. 21st Street, Chicago, IL 60608 and 3019 W. 21st Place, Chicago, IL, 60623—at <http://www.cookcountypropertyinfo.com/>. The Court may take judicial notice of these public records. *See Johnson v. Ames*, 2016 IL 121563, ¶ 7.

Defendants argue that Plaintiffs have not shown that there are people who stay *only* in one type of accommodation or the other, which they maintain is necessary for Plaintiffs to state a good-faith Uniformity Clause claim. Defs.’ MSJ at 10.² But the City has admitted that “there may be some individuals who stay (and pay taxes) only at vacation rentals or shared housing units in Chicago . . . , and some individuals who stay (and pay taxes) only at hotels, bed-and-breakfast establishments (“B&Bs”), or other hotel accommodations that are not shared housing units.” Defs.’ MSJ, Ex. C, Defs.’ Resp. to Pls.’ First Set of Interrog. No. 8. Indeed, it is beyond any reasonable doubt that such people exist.

Defendants receive no support from *Terry v. Metropolitan Pier & Exposition Authority*, 271 Ill. App. 3d 446 (1st Dist. 1995), which considered a Uniformity Clause challenge to an airport departure tax that applied only to fares charged by vehicles picking up passengers at Chicago airports and not to other vehicle fares. The court held that the plaintiffs failed to state a claim because they did not “allege that there is a class of vehicle operators whose only business consists of taking passengers from one of the metropolitan airports.” *Id.* at. 454. Here, in contrast, Plaintiffs *have* alleged the existence of two classes. *See* Ex. Q, Ans. ¶¶ 130-34. And, again, it is beyond doubt that those classes actually exist: it is inconceivable that there are *no* people who have only stayed at hotels during visits to Chicago and *no* people who have only stayed at shared housing units or vacation rentals during visits to Chicago. Even if the City had not admitted this fact, the Court could take judicial notice of it.³ *See In re Nylani M.*, 2016 IL

² Plaintiffs do not agree that their claim depends on the existence of these classes, for reasons stated in their memorandum opposing Defendants’ first motion to dismiss. Because the Court has accepted Defendants’ position on this point (MTD Order at 21), Plaintiffs note their continued disagreement here to preserve the issue.

³ In *Terry*, in contrast, the court could not take notice of the existence of the class at issue. The *Terry* plaintiffs had not even alleged its existence, and it was possible, in the absence of evidence to the contrary, that it did not exist. If there are taxis or other services that *only* pick up

App (1st) 152262, ¶ 36 (“A court may take judicial notice of matters generally known to the court and not subject to reasonable dispute.”).

III. There are no real and substantial differences between hotel guests and home-sharing guests.

In their motion for summary judgment, Plaintiffs observed that there is no real and substantial difference between the service provided by hotels and that provided by vacation rentals and shared housing units. Pls.’ Mot. Summ. J. (“Pls.’ MSJ”) at 9. Defendants have responded by arguing that Uniformity Clause jurisprudence requires courts to consider only whether there are differences between *people* taxed and people not taxed. City MSJ at 15. But that distinction is immaterial here: given that there are no real and substantial differences between the services they consume, there is no reason to believe there are real and substantial differences between hotel guests and home-sharing guests, and the City has not identified any.

Defendants argue in passing that the services provided by shared-housing units, vacation rentals, and other hotel accommodations are not identical because “hotels provide on-site security, room service, valet parking, concierge service, trash removal, etc.” Defs.’ MSJ at 15. But these are not necessary features of hotels as defined by the City Code, *see* Chi. Muni. Code §§ 3-24-020, 4-6-180(a), and they are not what the City taxes with its hotel tax. Besides, not all hotels provide all of those services. Many such services are paid for (and may be taxed) separately, *see, e.g.*, Chi. Muni. Code § 4-236-025 (valet parking tax); and some of those services are also provided by operators of vacation rentals and shared housing units. In any event, the provision of ancillary services in some accommodations does not constitute a real and substantial difference between the guests of the different types of accommodations.

passengers at airports (and never even drop passengers off at airports), their existence is not common knowledge. *See* Terry, 271 Ill. App. 3d at 454.

The lack of any real and substantial difference between home-sharing guests and guests of other hotel accommodations, by itself, is sufficient reason to conclude that the City's home-sharing surcharges violate the Uniformity Clause.

A. There are no real and substantial differences related to zoning.

Contrary to Defendants' argument (Defs.' MSJ at 12-16), the presence of home-sharing in certain residential districts where other hotel accommodations generally are not permitted does not justify the City's discriminatory taxation. Defendants have cited no authority for the proposition that zoning differences—by themselves, *per se*—constitute a real and substantial difference that justifies differential taxation under the Uniformity Clause. And the zoning difference Defendants identify does not establish that there is a real and substantial difference between home-sharing guests and patrons of other hotel accommodations.

The City's desire to preserve residential neighborhoods' character cannot justify the discriminatory taxation. First, this is irrelevant to the many zoning districts in which both home-sharing and other hotel accommodations (or commercial uses of property) are legally permitted to exist.

Second, there is no evidence that home-sharing disproportionately disrupts the "quiet" character of residential neighborhoods. Through an affidavit from Charles Lee, Supervisor of Business Compliance Investigations for the City's Department of Business Affairs and Consumer Protection, and a spreadsheet with records of 311 calls, the City purports to show that it receives more complaints about "nuisances, excessive noise, neighborhood disturbances, rules violations and condition of the property" from shared housing units and vacation rentals than from other hotel accommodations. Defs.' MSJ at 14 & Ex. H ¶ 4. But more complete records that the City has since produced refute this by showing there have been very few genuine nuisance

complaints arising out of legal home-sharing in Chicago. The *complete* spreadsheet includes all 356 calls to the City's 311 line that the City categorized as related to vacation rentals or shared housing units. *See* Exhibit S. It also includes columns indicating whether the City was able to contact the complaining witness, whether the witness then returned a complaint form, and whether the City issued any enforcement as a result of the complaint. *Id.* An additional spreadsheet that the City produced indicates, for each instance in which enforcement was issued, whether a given property was licensed as a vacation rental or registered as a shared housing unit at the time of the City's investigation. *See* Exhibit T. These records reveal the following:

Of the 356 calls on the City's comprehensive spreadsheet, only 128 (about 36%) resulted in a complaint form being filed with the City. *See* Ex. S. (Without a complaint form, the City takes no action. Ex. U, Dep. of Charles Lee at 25:19-26:6.) Of those 128 complaint forms, only 40 resulted in enforcement action by the City. *See* Ex. S. And of the 40 enforcement actions, only *fourteen* involved properties that were actually licensed as vacation rentals or registered as shared housing units. *See* Ex. T. Those 14 enforcement actions occurred at just *nine* different properties. *See id.* So problems requiring enforcement actions arose at only *nine* locations during the three years or so between the Ordinance's enactment in 2016 through early December 2019.

Even that overstates the "problem." Of the nine properties at which the City did take enforcement action, three involved complaints that were not based on nuisance activities but on other violations of the City's rules, such as owner absence or a violation of a building's private prohibition on short-term rentals. *Id.* Thus, nearly three years after the City began licensing and registering home-sharing units, it had taken enforcement action against only *six* licensed or registered properties based on nuisance complaints—too few to suggest that home-sharing gives rise to more disruptions or enforcement actions than other uses of residential property or other

types of hotel accommodations. Thus, the undisputed evidence refutes the City's purported justification for discriminating against home-sharing.

B. There are no real and substantial differences related to other taxes.

The City's justification based on the income and property taxes paid by the owners of hotels and bed-and-breakfasts also fails. As Defendants have emphasized, the Uniformity Clause is concerned with whether there are real and substantial differences between "*the people taxed and those not taxed.*" *Searle Pharm., Inc. v. Dep't of Revenue*, 117 Ill. 2d 454, 468 (1987). And the City's taxes on home-sharing and hotel accommodations are not paid by the *owners* of those accommodations but by the *guests* who use them. Chi. Muni. Code § 3-24-040. Thus, differences between income and property taxes paid by the owners of the different types of accommodations at issue are irrelevant and cannot constitute a real and substantial difference between "the people taxed and those not taxed" under the Ordinance Plaintiffs challenge.

Putting that fatal flaw aside, the City's argument is not correct as a factual matter. The City asserts that hotels pay income tax at a commercial rate of 7% rather than the "residential rate of 4.95%." Defs.' MSJ at 16. But Illinois has no "residential rate" of income taxation: there is a 4.95% rate for *individuals*, trusts, and estates, and a 7% rate for corporations. 35 ILCS 5/201(b)(5.4), (14). And corporations sometimes own a property, or properties, used for home-sharing and thus pay the 7% rate. *See, e.g., Joanne Cleaver, It's Not a Hotel. It's Not Airbnb. Meet the Short-Term Rental Startups Setting Up Shop in Chicago*, Chi. Trib., July 15, 2019.⁴

Defendants' argument based on property taxes is also flawed. It is misleading to simply say that "hotels pay property taxes at the higher commercial rate of 25% while owners of shared

⁴ <https://www.chicagotribune.com/real-estate/ct-re-brand-hotels-0721-20190715-kngbfvi7eba6jd5qfxid3y7az4-story.html>

housing units or vacation rentals only have to pay the residential rate of 10%.” Defs.’ MSJ at 16. Under tax incentive provisions, hotels could be subject to a rate as low as 10%. *See* Cook Cnty. Code of Ordinances §§ 74-63(9)-(12), 74-64(9)-(12). And the taxes that a given commercial property owner pays are affected by a complicated variety of other factors, such that “it is very difficult to do apples to apples comparisons, even among the commercial properties.” Mark Suppelsa, *Donald Trump’s Multi-Million Dollar Chicago Tax Break*, WGN (Feb. 17, 2016).⁵

Overall, the *effective* residential and commercial rates—*i.e.*, the rates stated as a percentage of full market value that property owners actually pay—are much lower, and the percentage-point difference between them much less, than the rates given in the code. In 2017, Chicago’s effective residential and commercial rates were approximately 1.74% and 3.98%, respectively. Civic Federation, *Estimated Effective Property Tax Rates 2008-2018: Selected Municipalities in Northeastern Illinois* (Oct. 21, 2019),⁶

Defendants further assert that hotels also “likely” have to pay or remit sales taxes, taxes on use of non-titled personal property and leases of tangible personal property, and, in some cases, “restaurant taxes.” Defs.’ MSJ at 16. But both hotel operators and home-sharers have to pay taxes on *other activities* besides the provision of lodging that the state or city taxes, to whatever extent they engage in them. Moreover, use taxes are imposed on all purchasers of goods (with various exceptions), including individuals. *See Irwin Indus. Tool Co. v. Dep’t of Revenue*, 394 Ill. App. 3d 1002, 1010 (1st Dist. 2009) (state imposes use tax on “purchaser-user of ... property for the privilege of using [the] property in Illinois”); Chi. Muni. Code § 3-27-030 (use tax on non-title personal property applicable to all purchasers). As for lease taxes, it is not

⁵ <https://wgntv.com/2016/02/17/donald-trumps-multi-million-dollar-chicago-tax-break/>

⁶ https://www.civicfed.org/Effective_Property_Tax_2008_2017

apparent what personal property hotels lease; regardless, the City’s tax on leases of personal property applies to lessees generally, including individuals. Chi. Muni. Code § 3-32-030.

Further, the City’s tax-burden argument does not account for offsetting subsidies that hotels may receive, for which individual homeowners are not eligible, such as tax increment financing (“TIF”), among others. *See, e.g.*, City of Chi. Dep’t of Planning & Dev., Central Loop TIF⁷ (identifying examples of hotels that received TIF funds from the City).

C. There are no real and substantial differences related to alleged effects on affordable housing.

Home-sharing’s purported effects on the availability of affordable housing, supposedly resulting from displacement of long-term housing (*see* Defs.’ MSJ at 17-22), also cannot justify the City’s discriminatory taxation.

As Plaintiffs have explained and the City has admitted, all hotels use space that could otherwise be used for long-term housing. Pls.’ MSJ at 9; Defs.’ MSJ at 20 (admitting that “[e]very business or commercial enterprise keeps property out of the long-term housing market”). On the other hand, many shared-housing units do *not* displace long-term housing because they also serve as the host’s primary residence. Indeed, the Ordinance requires this for all single-family homes and units in buildings with two to four residential units—the housing the City is most concerned with preserving as long-term residences.⁸ *See* Pls.’ MSJ at 9-10.

In response to this point, the City argues that residential properties used for home-sharing

⁷ https://www.chicago.gov/city/en/depts/dcd/supp_info/tif/central_loop_tif.html

⁸ Also, new or vacant units may be rented out on a short-term basis as shared housing units until long-term tenants are found. Short-term rentals therefore do not remove these units from the long-term market and may even help incentivize the construction of new long-term residential units, as they give developers a means of obtaining revenue during periods when long-term rentals would not be feasible. *See* Cleaver, *supra* (explaining how short-term rentals “free[] cash that developers need to deliver more units to the Chicago housing market”).

“are no longer being used for the purpose for which they were originally intended.” Defs.’ MSJ at 17. But, as Plaintiffs have explained, many hotels are in areas zoned (intended) to allow residential uses. *See* Pls.’ MSJ at 10. And, again, many properties used for home-sharing *are* still used as long-term housing, especially in low-density residential neighborhoods. And regardless of what anyone “originally intended,” hotels do, in fact, occupy space, buildings, and floors of buildings that could otherwise be used for long-term housing.

The report and testimony of the City’s proffered expert, Bryan Esenberg, does not refute this point. As an initial matter, Esenberg is not qualified to opine on this issue for the reasons presented in Plaintiffs’ motion to exclude his testimony. Further, his report and testimony address home-sharing’s alleged effects on affordable housing—not whether it has a greater effect than other hotel accommodations, which is the critical question in determining whether home-sharing’s purported effects on affordable housing constitute a “real and substantial” difference between them and other hotel accommodations as the City asserts.

Defendants cite Esenberg’s example of an SRO building purportedly being converted for a building “reserved for short-term rentals,” Defs.’ MSJ at 19, but Esenberg has admitted that he does not know whether short-term rentals actually caused the elimination of this particular affordable housing. Pls.’ MSJ, Ex. N, Dep. of Bryan Esenberg at 27:17-28:5. He also admitted that does not know whether more than one of the building’s 24 units will be used for short-term rentals, *id.* at 25:8-21, and was unaware that the City Code would prohibit more than six units from being used for home-sharing. *Id.* at 25:4-7. *See* Pls.’ Mot. to Exclude at 9.

Defendants argue that “there is no requirement that a tax must apply to every entity which contributes to the problem sought to be addressed by that tax,” citing a case in which plaintiffs unsuccessfully challenged a tax on certain tobacco products used to fund long-term

health care because it did not also apply to other products associated with a need for long-term care, such as “alcohol, red meat, and eggs,” *Arangold Corp. v. Zehnder*, 204 Ill. 2d 142, 154 (2003). Defs.’ MSJ at 20. But real and substantial differences between *food* and *cigars* are obvious in a way that differences between the things the City includes in its definition of “hotel accommodations” are not.

Defendants note (*id.*) that *Arangold* rejected the argument that “the legislature was bound to tax all those who are equally or more related to the [tax’s] objective.” 204 Ill. 2d at 155. But that is not Plaintiffs’ argument here. Here, the City has asserted that the supposed tendency of shared housing units to reduce the supply of available housing is a real and substantial difference between those accommodations and other hotel accommodations. Defs.’ MSJ, Ex. C, Defs.’ Resp. to Pls.’ First Set of Interrog. No. 11. Plaintiffs have refuted that argument by showing that it is “unsupported by the facts” and have thus satisfied their burden under the Uniformity Clause. *Arangold*, 204 Ill. 2d at 153; *cf. Peterson Plaza Pres., L.P. v. City of Chi. Dep’t of Fin.*, 2019 IL App (1st) 181502, ¶ 49 (to prevail in Uniformity Clause challenge, plaintiffs would have had to show that taxed and untaxed activities had the same effects).

IV. The City’s classification is not reasonably related to the purpose of the Ordinance or to public policy.

The surcharges Plaintiffs challenge also violate the Uniformity Clause because the City’s decision to single out home-sharing accommodations is not reasonably related to their purpose or to public policy. *See* Pls.’ MSJ at 11-20.

A. Imposing a 4% surcharge only on home-sharing is not reasonably related to addressing homelessness or preserving quiet residential neighborhoods.

In discovery, Plaintiffs asked the City to identify “each and every way that the City asserts that the [4%] home-sharing surcharge bears a reasonable relationship to any object of the

legislation or to any public policy.” Defs.’ MSJ, Ex. C, Defs.’ Resp. to Pls.’ First Set of Interrog. Nos. 13-14. In response, the City cited two policies: addressing the problem of homelessness; and “keep[ing] residential neighborhoods relatively quiet, peaceful, and uncongested.” *Id.*

Now, however, the City appears to have abandoned the justification based on homelessness, arguing that whether home-sharing “lead[s] to an increase in homelessness” is “wholly irrelevant.” Defs.’ MSJ at 21. Instead, the City now asserts that the only relevant (purported) fact is that “shared-housing units remove long-term housing from the market whereas hotels do not.” *Id.* That makes no sense: the reason the City said removal of housing from the market was related to its surcharge in the first place was because the surcharge funded services to address homelessness, which the removal of housing units supposedly made worse. The City has not explained how removal of housing from the market could be relevant to the surcharge in the absence of any effect on homelessness.

It will not suffice for the City to assert that “providing for the homeless ... is a legitimate public policy concern.” Defs.’ MSJ at 22. That is not the question. The question under the Uniformity Clause is whether the City’s decision to impose taxes on home-sharing, above those charged to other types of hotel accommodations, bears a reasonable relationship to that policy. The City has not shown that it does. Again, hotels use property that could otherwise be used for long-term housing, while many houses used for home-sharing, in contrast, do *not* reduce the supply of housing because they are still used as long-term housing.

As for whether home-sharing does affect homelessness, the Court should reject the City’s Esenberg’s testimony on this issue for the reasons given in Plaintiffs’ motion to exclude it. And, contrary to Defendants’ argument, the report and testimony of Plaintiffs’ expert, Dr. Adrian Moore, does not establish a link between home-sharing and homelessness. Dr. Moore stated that

restrictions on housing supply can affect home prices, which can in turn affect homelessness, but he also concluded that home-sharing's effect on housing supply and prices was minimal and that one cannot assume that this would increase homelessness. *See* Pls.' MSJ at 18-20.

The City also cannot rely on the public policy of "keep[ing] residential neighborhoods relatively quiet" because it has not shown any relationship between home-sharing's alleged effects on the tranquility of residential neighborhoods and the surcharge it imposes *to fund services for the homeless*. *See Primeco Pers. Commc'ns, L.P. v. I.C.C.*, 196 Ill. 2d 70, 85 (2001) (class of entites taxed must be reasonably related to the "object (or purpose) of the taxing provision"). Further, the City admits that the surcharge will "not necessarily" prevent disruptions in residential neighborhoods—i.e., it bears no relationship to that purported problem. Defs.' MSJ, Ex. C, Defs.' Resp. to Pls.' First Set of Interrog. No. 15. Besides, as discussed above, the City's own evidence refutes the premise that home-sharing disrupts residential neighborhoods in any disproportionate or significant way.

B. Imposing a 2% surcharge only on home-sharing is not reasonably related to addressing domestic violence or homelessness.

The City also has not shown that imposing an additional 2% surcharge exclusively on home-sharing accommodations is reasonably related to the purpose of the tax or to public policy.

The City attempts to justify this surcharge, which funds services for victims of domestic violence, by saying that "lack of safe and affordable housing" imposes a barrier to domestic violence victims who seek to leave abusive partners because it removes housing that might otherwise be available to those victims and "to the City and non-profit organizations seeking to shelter victims of domestic violence." Ex. V, Defs.' Resp. to Pls.' 2d Set of Interrog. No. 28. It also argues that singling out home-sharing for the surcharge is related to the policy of "reduc[ing] the number of homeless people in Chicago." *Id.*

As Plaintiffs have explained, however, there is no evidence that home-sharing reduces the availability of affordable housing that would otherwise be used by victims of domestic violence. *See* Pls.' MSJ at 13-16. Nor is there any evidence that home-sharing contributes to homelessness. *See id.* Further, even if home-sharing did have some effect on the availability of affordable housing or on homelessness, there is no reason to believe it has a greater effect than the use of property for other hotel accommodations.

Therefore, the City cannot establish any reasonable relationship between singling out home-sharing for a 2% surcharge and the prevention of domestic violence or homelessness.

IV. Defendants have not justified the City's fees.

Defendants have also failed to justify the City's different fees on shared housing units and vacation rentals. They argue that shared housing unit *operators* and vacation-rental licensees pay the same fee: \$250 every two years. Defs.' MSJ at 23-24. But an individual with a single registered shared housing unit pays no fee (though an intermediary must pay \$60 on his or her behalf), while an individual with a single vacation rental pays a \$250 license fee. *See* Ex. Q, Answer to 2nd Am. Compl. ¶¶ 49, 52, 53. And an individual with multiple shared-housing units must obtain a \$250 shared housing unit operator license, regardless of the number of units he or she registers, while an individual with multiple vacation rentals must pay \$250 per property. Chi. Muni. Code §§ 4-5-010(2); 4-6-010(a); 4-6-300(c), (d)(2). The City has not explained how these fees are justified by real and substantial differences between shared housing units and vacation rentals or how the different fee classifications serve the legislation's purpose or public policy.

DATED: January 17, 2020

Respectfully submitted,

LEILA MENDEZ and ALONSO ZARAGOZA

By: /s/ Jacob Huebert
One of their attorneys

Liberty Justice Center
Cook County No. 49098
190 S. LaSalle Street, Suite 1500
Chicago, Illinois 60603
(312) 263-7668
(312) 263-7702 (fax)
jhuebert@libertyjusticecenter.org
jschwab@libertyjusticecenter.org

Goldwater Institute
Jacob Huebert (#6305339)
Timothy Sandefur (#6325089 / Pro Hac Vice #61192)
Christina Sandefur (# 6325088 Pro Hac Vice #61186)
500 E. Coronado Road
Phoenix, Arizona 85004
(602) 462-5000
(602) 256-7045 (fax)
tsandefur@goldwaterinstitute.org
csandefur@goldwaterinstitute.org

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I, Jeffrey Schwab, an attorney, hereby certify that on January 17, 2020, I served the foregoing Plaintiffs' Combined Reply in Support of Motion for Summary Judgment and Response to Defendants' Motion for Summary Judgment via electronic filing service provider FileTime Illinois to Weston Hanscom (Weston.Hanscom@cityofchicago.org), Richard Danaher (Richard.Danaher@cityofchicago.org), and Jason Rubin (Jason.Rubin@cityofchicago.org).

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, 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.

/s/ Jeffrey M. Schwab
Jeffrey M. Schwab

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

LEILA MENDEZ and ALONSO ZARAGOZA,)	
)	
Plaintiffs,)	Case No. 16 CH 15489
)	
v.)	Judge Sanjay T. Tailor
)	
CITY OF CHICAGO, et al.,)	
)	
Defendants.)	
)	

**LIST OF EXHIBITS TO PLAINTIFFS' COMBINED REPLY IN SUPPORT OF
MOTION FOR SUMMARY JUDGMENT AND RESPONSE TO DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT**

Exhibit P – Plaintiffs’ Objections and Answers to Defendants’ First Set of Requests to Admit to Plaintiffs

Exhibit Q – City of Chicago Answer to Second Amended Complaint

Exhibit R – Stipulations

Exhibit S - Spreadsheet of calls to the City’s 311 line that the City categorized as related to vacation rentals or shared housing units.

Exhibit T – Spreadsheet of enforcement actions to the City’s 311 line that the City categorized as related to vacation rentals or shared housing units.

Exhibit U – Deposition Transcript of Charles Lee.

Exhibit V – City of Chicago’s Response to Plaintiffs’ Second Set of Interrogatories.

Exhibit P

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

LEILA MENDEZ, et al.,)	
)	
Plaintiffs,)	Case No. 2016-CH-15489
)	
v.)	Judge Sanjay T. Tailor
)	
CITY OF CHICAGO, et al.,)	
)	
Defendants.)	
)	

**PLAINTIFFS' OBJECTIONS AND ANSWERS
TO DEFENDANTS' FIRST SET OF REQUESTS TO ADMIT TO PLAINTIFFS**

Plaintiffs Leila Mendez, Sheila Sasso, and Alonso Zaragoza respond to Defendants' First Set of Requests to Admit to Plaintiffs as follows.

Requests to Admit

1. Prior to June 2010, vacation rentals were not allowed in Chicago.

ANSWER: Plaintiffs object to this Request because it seeks an admission regarding a conclusion of law. Plaintiffs object to this Request because it is insufficiently specific with respect to who supposedly did not "allow" vacation rentals in Chicago.

2. Prior to June 2016, house sharing rentals were not allowed in Chicago.

ANSWER: Plaintiffs object to this Request because it seeks an admission regarding a conclusion of law. Plaintiffs object to this Request as insufficiently specific because it fails to define "house sharing rentals" and that term is vague, ambiguous, and unintelligible, and because the Request fails to specify who supposedly did not "allow" house sharing rentals in Chicago.

3. All hotels in Chicago have at least one employee or other agent on duty at the hotel at all times that the hotel is in operation.

ANSWER: Plaintiffs lack sufficient knowledge to admit or deny this Request.

4. All bed & breakfast establishments in Chicago are required to be owner occupied.

ANSWER: Plaintiffs object to this Request because it seeks an admission regarding a conclusion of law. Plaintiffs object to this Request as insufficiently specific because it fails to define “owner occupied” and fails to specify who imposes the putative requirement, and for that reason the Request is vague, ambiguous, and unintelligible.

5. Vacation rentals in Chicago do not always have an employee or other agent on duty at the vacation rental during the time that the unit is being rented to a third party.

ANSWER: To the extent that the Request seeks information about what “always” happens at every vacation rental property in the city of Chicago, Plaintiffs object that the question is overbroad, vague, unintelligible, and irrelevant. Subject to and without waiving the foregoing objections, Plaintiffs answer that they lack sufficient knowledge to admit or deny this Request.

6. Vacation rentals in Chicago are not required to be owner occupied.

ANSWER: Plaintiffs object to this Request because it seeks an admission regarding a conclusion of law. Plaintiffs object to this Request as insufficiently specific because it fails to define “owner occupied” and fails to specify who supposedly does not “require” a vacation rental to be owner occupied.

7. House sharing units in Chicago do not always have an employee or other agent on duty at the unit during the time that the unit is being rented to a third party.

ANSWER: Plaintiffs object to this Request as insufficiently specific because it fails to define “house sharing units.” To the extent that the Request seeks information about what “always” happens, Plaintiffs object that the question is overbroad, vague, unintelligible, and irrelevant. Plaintiffs also object due to lack of foundation—specifically, Plaintiffs do not have employees. Subject to and without waiving the foregoing objections, Plaintiffs admit that they have not always had an employee or other agent on duty at their respective homes when they have rented them to third parties through Airbnb. Plaintiffs otherwise lack sufficient knowledge to admit or deny the Request.

8. House sharing units in Chicago are not required to be owner occupied.

ANSWER: Plaintiffs object to this Request because it seeks an admission regarding a conclusion of law. Plaintiffs object to this Request as insufficiently specific because it fails to define “house sharing units,” fails to define “owner occupied,” and fails to specify who supposedly does not “require” house sharing units to be owner occupied, and for these reasons, the Request is vague, ambiguous, and unintelligible.

9. Plaintiffs all pay property taxes on their vacation rental and/or house sharing properties at the 10% rate that applies to residential properties under the Cook County Real Estate Classification Ordinance.

ANSWER: Plaintiffs object to this Request to the extent that it seeks an admission regarding a conclusion of law—specifically, what tax rate applies under the County Real Estate

Classification Ordinance. Subject to and without waiving the foregoing objection, Plaintiffs admit that they pay property taxes to Cook County for the properties they rent out on Airbnb.

10. Hotels pay property taxes at the 25% rate that applies to commercial properties under the Cook County Real Estate Classification Ordinance.

ANSWER: Plaintiffs object to this Request because it seeks an admission regarding a conclusion of law—specifically, what tax rate applies under the County Real Estate Classification Ordinance. Subject to and without waiving the foregoing objection, Plaintiffs state that they are unable to admit or deny this Request because they lack personal knowledge of the taxes that any particular hotel pays.

11. None of the Plaintiffs have obtained a license to operate any of their properties as a “vacation rental.”

ANSWER: Admit.

12. None of the Plaintiffs have obtained a license to be a “Shared Housing Unit Operator.”

ANSWER: Admit.

13. None of the Plaintiffs is a “short term residential rental intermediary.”

ANSWER: Admit.

Dated: June 12, 2018

Respectfully submitted,

**LEILA MENDEZ, SHEILA SASSO, and
ALONSO ZARAGOZA**

By: /s/ Jacob Huebert
One of their Attorneys

Liberty Justice Center
Cook County No. 49098
Jacob Huebert (#6305339)
Jeffrey Schwab (#6290710)
190 S. LaSalle Street, Suite 1500
Chicago, Illinois 60603
(312) 263-7668
(312) 263-7702 (fax)
jhuebert@libertyjusticecenter.org
jschwab@libertyjusticecenter.org

Goldwater Institute
Timothy Sandefur (#6325089 / pro hac vice #61192)
Christina Sandefur (#6325088 / pro hac vice # 61186)
500 E. Coronado Road
Phoenix, Arizona 85004
(602) 462-5000
(602) 256-7045 (fax)
tsandefur@goldwaterinstitute.org
csandefur@goldwaterinstitute.org

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I, Jacob Huebert, an attorney, hereby certify that on June 12, 2018, I served the foregoing Objections and Answers to Defendants' First Set of Requests to Admit to Plaintiffs on Defendants' counsel by electronic mail sent to Weston Hanscom (Weston.Hanscom@cityofchicago.org) and Jason Rubin (Jason.Rubin@cityofchicago.org).

/s/ Jacob Huebert _____
Jacob Huebert

Exhibit Q

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

LEILA MENDEZ and ALONSO ZARAGOZA,)	
)	
)	
Plaintiffs,)	
)	
)	
v.)	Case No. 16 CH 15489
)	
CITY OF CHICAGO, a municipal corporation;)	Hon. Sanjay T. Tailor
and ROSA ESCARENO, in her official)	
capacity as Commissioner of the City of)	
Chicago Department of Business Affairs and)	
Consumer Protection,)	
)	
Defendants.)	

CITY OF CHICAGO ANSWER TO SECOND AMENDED COMPLAINT

The City of Chicago (“City”) answers Plaintiffs’ Second Amended Complaint as follows:

Introduction

1. This is a civil-rights lawsuit to vindicate the constitutional rights of homeowners who wish to offer their private homes to overnight guests but have been arbitrarily and irrationally deprived of the right to do so by the City of Chicago's draconian and unintelligible 58-page Shared Housing Ordinance (Ordinance No. O2016-5111, hereinafter the “Ordinance”) and the subsequent amendment to the Ordinance (Ordinance No. O2018-4988, hereinafter the “Amendment”).

Answer: City admits that Plaintiffs have brought a lawsuit alleging purported violations of Plaintiffs’ constitutional rights. All remaining allegations of paragraph 1 are denied.

2. Home-sharing is a long-standing American tradition, whereby property owners allow people to stay in their homes, sometimes for money, rather than staying in a hotel. The so-called “sharing economy” has empowered homeowners and travelers to connect better than ever before. Online home-sharing platforms like Airbnb and Homeaway enable homeowners to rent their homes to make money and help pay their mortgages. Consumers benefit from more choice and lower prices; communities attract visitors who support local businesses; and people are incentivized to buy dilapidated homes and fix them up.

Answer: City admits that home-sharing describes the practice whereby a property owner, for consideration, allows others to stay in that property. City admits that the “sharing economy” enables better connection between homeowners and travelers. City admits that Airbnb and Homeaway are online home-sharing platforms that enable property owners to rent their property for consideration, which they may use to pay their mortgages and other expenses. City admits that home-sharing provides certain benefits to certain people, including, in some cases, more choice and lower prices. City lacks knowledge sufficient to form a belief as to the truth of the remaining allegations of paragraph 2.

3. Through the Ordinance, however, the City has imposed draconian and unintelligible restrictions on home-sharing that hurt communities, violate constitutional rights, and punish responsible homeowners.

Answer: City denies all allegations of paragraph 3.

4. Plaintiffs Leila Mendez and Alonso Zaragoza bring this complaint for declaratory and injunctive relief challenging the Ordinance as vague, unintelligible, and an unconstitutional intrusion on their rights to privacy, due process of law, equal protection, and other rights. Plaintiffs seek a declaratory judgment that the Ordinance is invalid and a permanent injunction against its further enforcement.

Answer: City admits that Plaintiffs have filed a complaint seeking declaratory and injunctive relief for purported violations of Plaintiffs’ constitutional rights. All remaining allegations of paragraph 4 are denied.

Parties

5. Plaintiff Leila Mendez is a resident of Cook County, Illinois, who owns a home in Chicago.

Answer: City lacks knowledge sufficient to form a belief as to the truth of these allegations.

6. Plaintiff Alonso Zaragoza is a resident of Cook County and Chicago, Illinois, who owns a three-unit residential building in Chicago.

Answer: City lacks knowledge sufficient to form a belief as to the truth of these allegations.

7. Defendant City of Chicago (the “City”) is an Illinois municipal corporation.

Answer: City admits the allegations of paragraph 7.

8. Defendant Rosa Escareno, sued in her official capacity, is the Commissioner of the City of Chicago Department of Business Affairs and Consumer Protection (“Commissioner”) and is responsible for enforcing the Ordinance.

Answer: City admits that this lawsuit has named Rosa Escareno as a defendant in her official capacity as the Commissioner of the City of Chicago Department of Business Affairs and Consumer Protection. City admits that the Commissioner is responsible for enforcing the regulatory portions of the Ordinance. All remaining allegations of paragraph 8 are denied.

Jurisdiction

9. This Court has subject matter jurisdiction over this matter under 735 ILCS 5/2-701 because Plaintiffs seek a declaratory judgment that the Ordinance violates various provisions of the Illinois Constitution.

Answer: City admits the allegations of paragraph 9.

10. This Court has personal jurisdiction over the Defendants because this lawsuit arises from Defendants’ actions in the State of Illinois.

Answer: City admits that this Court has personal jurisdiction over Defendants.

City denies that Defendants’ actions gave rise to any valid cause of action. All remaining allegations of paragraph 10 are denied.

11. Venue is proper in Cook County because Plaintiffs reside in Cook County, Illinois, and Defendants are located in Cook County.

Answer: City admits that venue is proper and admits that Defendants are located in Cook County. City lacks knowledge sufficient to form a belief as to whether Plaintiffs reside in Cook County, Illinois.

Factual Allegations

12. The Chicago City Council passed the Ordinance on June 22, 2016, and Mayor Rahm Emanuel signed it on June 24, 2016.

Answer: City admits the allegations of paragraph 12.

13. Several provisions of the Ordinance took effect on July 15, 2016, including Section 2, which amends the Chicago Municipal Code's definition of "hotel accommodations" to include home-sharing arrangements, imposes an additional 4% tax on home-sharing rentals, and provides for rescission of shared-housing registrations; and the provisions of Section 8 which create Chi. Muni. Code §§ 4-13-260(a)(9) (prohibiting owners of units from renting them out through home sharing arrangements where a building's owner has prohibited it) and 4-13-270(c) (establishing a list of buildings whose owners have prohibited them from being rented out through home sharing arrangements).

Answer: City admits that Section 2 of the Chicago Shared Housing Ordinance ("Ordinance") amends the Chicago Municipal Code's ("Code") definition of "hotel accommodations" to include a "shared housing unit" as defined by Section 4-14-010. City admits that Section 2 of the Ordinance imposes a surcharge upon the rental or leasing of any vacation rental or shared housing unit in the City of Chicago at a rate of 4% of the gross rental or leasing charge. City admits that Section 8 of the Ordinance adds a new Chapter, Chapter 4-13, to Title IV of the Code. City admits that Code Section 4-13-260(a)(9) provides that "A short term residential rental shall be ineligible for listing by a provider on a licensee's platform under the following conditions: . . . (9) If the building contains five or more dwelling units, when the owner 31 of the building notifies the commissioner, in a manner prescribed by rule, that no licensed vacation rentals or shared housing units are permitted to operate anywhere in such building. Provided, however, that if

the building is a cooperative building, condominium building or building governed by a homeowners association, the requirement that such building must contain five or more dwelling units shall not apply for purpose of this subsection (a)(9).” City admits that Code Section 4-13-270(c) provides that: “The commissioner shall maintain a list, which shall be known as the prohibited buildings list, identifying the address(es) of all buildings whose owner(s), including any applicable homeowners association or board of directors, have notified the commissioner, pursuant to Section 4-13-260(a)(9), that no vacation rentals or shared housing units, in any combination, are permitted to operate anywhere in such building. The commissioner shall: (1) post the prohibited building list on the City of Chicago website; (2) establish a process by rule for verifying any notification received from a building owner(s) requesting the commissioner to include such building on the prohibited buildings list; and (3) establish a process, by rule, to enable building owners to remove buildings from the prohibited buildings list.” City admits that Sections 4-13-260(a)(9) and 4-13-270(c) took effect on July 15, 2016. All remaining allegations of paragraph 13 are denied.

14. All other provisions of the original Ordinance became effective on December 17, 2016.

Answer: City admits that all provisions of the Ordinance prior to the most recent amendment, other than Section 2, Section 4-13-260(a)(9) and Section 4-13-270(c), were originally scheduled to become effective on December 17, 2016. Answering further, City states that because of the stay imposed on enforcement of the Ordinance in Keep Chicago Livable v. City of Chicago, 16-cv-10371, the other

provisions of the Ordinance did not become effective until March 14, 2017 when the stay was lifted.

15. The Chicago City Council passed the Amendment to the Ordinance on July 25, 2018, and it became law on or before the City Council's next meeting on September 20, 2018 pursuant to 65 ILCS 5/3.1-40-45.

Answer: City admits that the Chicago City Council passed the Amendment to the Ordinance ("Amendment") on July 25, 2018. Answering further, the City states that the Amendment was published on September 20, 2018 and that the Amendment will become effective on December 1, 2018. All remaining allegations of paragraph 15 are denied.

16. The Amendment will take effect on the first day of the month that begins at least 60 days after its passage and publication. It creates Chi. Mun. Code §3-24-030(C), which imposes a 2% tax on home-sharing rentals, in addition to the 4% tax on home-sharing rentals that was imposed by the original Ordinance.

Answer: City admits the allegations of paragraph 16.

Definitions

17. The Ordinance establishes two categories of shared-housing arrangements, which it calls "vacation rentals" and "shared housing units." *Compare* Chi. Muni. Code § 4-14-010 *with* Chi. Muni. Code § 4-6-300(a).

Answer: City admits that the term "shared housing unit" is defined in Section 4-14-010 of the Code. City admits that the term "vacation rental" is defined in Section 4-6-300(a) of the Code. All remaining allegations of paragraph 17 are denied.

18. The Ordinance's definitions of these two terms are nearly identical, except that they are mutually exclusive.

Answer: City states that the Ordinance definitions of "shared housing unit" and "vacation rental" speak for themselves and denies all allegations that are contrary to such definitions as set forth in the Ordinance.

19. The Ordinance defines a “vacation rental” as “a dwelling unit that contains 6 or fewer sleeping rooms that are available for rent or for hire for transient occupancy by guests,” *not* including “(1) single-room occupancy buildings or bed-and-breakfast establishments, as those terms are defined in Chi. Muni. Code § 13-4-010; (2) hotels, as that term is defined in Chi. Muni. Code § 4-6-180; (3) a dwelling unit for which a tenant has a month-to-month rental agreement and the rental payments are paid on a monthly basis; or (4) corporate housing; (5) guest suites; or (6) shared housing units registered pursuant to Chapter 4-14 of this Code.” Chi. Muni. Code § 4-6-300.

Answer: City denies that Plaintiffs have cited the entirety of the definition of “vacation rental” as set forth in Code Section 4-6-300. City admits that those portions quoted by Plaintiffs are quoted accurately.

20. The Ordinance defines a “shared housing unit” as “a dwelling unit containing 6 or fewer sleeping rooms that is rented, or any portion therein is rented, for transient occupancy by guests,” not including “(1) single-room occupancy buildings; (2) hotels; (3) corporate housing; (4) bed-and-breakfast establishments, (5) guest suites; or (6) *vacation rentals.*” Chi. Muni. Code § 4-14-010 (emphasis added).

Answer: City denies that Plaintiffs have cited the entirety of the definition of “shared housing unit” as set forth in Code Section 4-14-010. City admits that those portions quoted by Plaintiffs are quoted accurately.

21. Consequently, a property is classified as a shared housing unit if it (a) meets the criteria specified, which are the same criteria that define a vacation rental, but (b) is not a vacation rental.

Answer: City denies all allegations of paragraph 21.

Warrantless Searches

22. The Ordinance requires any property owner who rents out a room or home through a shared-housing arrangement classified as a “vacation rental” to submit to warrantless inspections by city officials or third parties. Chi. Muni. Code § 4-6-300(d)(2)(e)(1). The Ordinance also subjects all vacation rentals to an unlimited number of inspections by the building commissioner or any third party he or she may designate “*at any time and in any manner.*” Chi. Muni. Code § 4-6-300(e)(1) (emphasis added).

Answer: The allegations of this paragraph exclusively relate to a Count previously dismissed and are therefore not answered.

23. The Ordinance subjects a “shared housing unit operated by a shared housing unit operator” to inspections by the building commissioner (or a third party) “at least once every two years.” Chi. Muni. Code § 4-16-230.

Answer: The allegations of this paragraph exclusively relate to a Count previously dismissed and are therefore not answered.

24. The Ordinance does not require the building commissioner to find probable cause or to obtain a warrant before ordering an inspection of a “vacation rental” or a “shared housing unit.”

Answer: The allegations of this paragraph exclusively relate to a Count previously dismissed and are therefore not answered.

25. Through these provisions, the Ordinance delegates unlimited and unbounded discretion to the building commissioner to conduct, or to commission a third party to conduct, unrestricted searches of homes for any reason, at any time, and in any manner.

Answer: The allegations of this paragraph exclusively relate to a Count previously dismissed and are therefore not answered.

The Primary Residence Rule

26. The Ordinance also includes rules prohibiting the use of certain homes as vacation rentals or shared housing units if they are not the owner’s “primary residence.”

Answer: The allegations of this paragraph exclusively relate to a Count previously dismissed and are therefore not answered.

27. The Ordinance defines a “platform” as “an internet-enabled application, mobile application, or any other digital platform used by a short term residential rental intermediary to connect guests with a short term residential rental provider.” Chi. Muni. Code § 4-13-100. Short-term residential rental intermediary is defined as “any person who, for compensation or a fee: (1) uses a platform to connect guests with a short term residential rental provider for the purpose of renting a short term residential rental, and (2) primarily lists shared housing units on its platform.” *Id.* “Advertising platform” is defined as “any person who, for compensation or a fee: (1) uses a platform to connect guests with a short term residential rental provider for the purpose of renting a short term residential rental, and (2) primarily lists licensed bed-and-breakfast establishments, vacation rentals, or hotels on its platform or dwelling units that require a license under this Code to engage in the business of a short term residential rental.” *Id.*

Answer: The allegations of this paragraph exclusively relate to a Count previously dismissed and are therefore not answered.

28. The Ordinance prohibits the owner of a single family home from listing that property on a “platform”—regardless of whether that home is defined as a “vacation rental” or a “shared housing unit”—and/or from renting the property as either a “vacation rental” or a “shared housing unit,” unless that single family home is the owner's “primary residence.” Chi. Muni. Code §§ 4-6-300(h)(8), 4-14-060(d).

Answer: The allegations of this paragraph exclusively relate to a Count previously dismissed and are therefore not answered.

29. The Ordinance also prohibits the owner of a unit within a building that has two, three, or four dwelling units (inclusive) from listing that property on a “platform” and from renting out the property as a vacation rental or a shared housing unit, unless that unit is: (1) the “primary residence” of the vacation-rental licensee or shared-housing host; and (2) the only unit in the building that is or will be used as a vacation rental or shared housing unit. Chi. Muni. Code §§ 4-6-300(h)(9), 4-14-060(e).

Answer: The allegations of this paragraph exclusively relate to a Count previously dismissed and are therefore not answered.

30. These two prohibitions — hereinafter referred to individually and collectively as the “Primary Residence Rule” — do not apply to owners of homes located in buildings with five or more dwelling units. Those owners may offer their homes as “vacation rentals” or “shared housing units” regardless of whether or not the homes are the owner's primary residence. Chi. Muni. Code §§ 4-6-300(h)(1); 4-14-060(f).

Answer: The allegations of this paragraph exclusively relate to a Count previously dismissed and are therefore not answered.

31. Because of the Primary Residence Rule for single-family homes, the Ordinance requires an applicant seeking a license to use a single-family home as a vacation rental to submit with his or her application “an attestation that such home is the applicant’s or licensee’s primary residence” or, alternatively, that one of the specified exceptions to the Primary Residence Rule applies. Chi. Muni. Code § 4-6-300(b)(8). The Ordinance also requires an applicant seeking to use a unit in a building with two, three, or four units as a vacation rental to submit with his or her application an attestation that the unit “(i) is the applicant’s or licensee’s primary residence; and (ii) is the only dwelling unit in the building that is or will be used as a vacation rental or shared housing unit, in any combination,” or, alternatively, that one of the specified exceptions to the rule applies. Chi. Muni. Code. § 4-6-300(b)(9).

Answer: The allegations of this paragraph exclusively relate to a Count previously dismissed and are therefore not answered.

32. The Ordinance makes several exceptions to the Primary Residence Rule:

Answer: The allegations of this paragraph exclusively relate to a Count previously dismissed and are therefore not answered.

33. The *first* exception to the Primary Residence Rule is that the prohibitions do *not* apply if the owner of the home or unit in question “is on active military duty and . . . has appointed a designated agent or employee to manage, control and reside in the [home or unit] during the [owner's] absence.” Chi. Muni. Code §§ 4-6-300(h)(8), (9); 4-14-060(d), (e).

Answer: The allegations of this paragraph exclusively relate to a Count previously dismissed and are therefore not answered.

34. The *second* exception to the Primary Residence Rule is that the prohibitions do not apply if the owner has received a “commissioner's adjustment.” Chi. Muni Code §§ 4-6-300(h)(8), (9); 4-14-060(d), (e).

Answer: The allegations of this paragraph exclusively relate to a Count previously dismissed and are therefore not answered.

35. Under Chi. Muni. Code §§ 4-6-300(1) and 4-14-100(a), the Commissioner may approve such an “adjustment” — *i.e.*, an exception to the Primary Residence Rule — “if, based on a review of relevant factors, the Commissioner concludes that such an adjustment would eliminate an extraordinary burden on the applicant in light of unique or unusual circumstances and would not detrimentally impact the health, safety, or general welfare of surrounding property owners or the general public.”

Answer: The allegations of this paragraph exclusively relate to a Count previously dismissed and are therefore not answered.

36. The Ordinance lists factors that the Commissioner may consider in deciding whether to make an exception to the Primary Residence Rule. The Ordinance explicitly declares that the factors are “by way of example and not limitation.” Chi. Muni. Code §§ 4-6-300(1), 4-14-100(a). Those factors include: “(i) the relevant geography, (ii) the relevant population density, (iii) the degree to which the sought adjustment varies from the prevailing limitations, (iv) the size of the relevant building and the number of units contemplated for the proposed use, (v) the legal nature and history of the applicant, (vi) the measures the applicant proposes to implement to maintain quiet and security in conjunction with the use, (vii) any extraordinary economic hardship to the applicant, due to special

circumstances, that would result from the denial, (viii) any police reports or other records of illegal activity or municipal code violations at the location, and (ix) whether the affected neighbors support or object to the proposed use.” *Id.*

Answer: The allegations of this paragraph exclusively relate to a Count previously dismissed and are therefore not answered.

37. The *third* exception to the Primary Residence Rule exempts vacation-rental applicants or licensees who “held a valid vacation rental license, as of June 22, 2016, for the [home or unit in question],” Chi. Muni. Code §§ 4-6-300(h)(8), (9), and shared housing applicants whose home or unit “was properly licensed, as of June 22, 2016, as a non-owner occupied vacation rental,” Chi. Muni. Code §§ 4-14-060(d), (e).

Answer: The allegations of this paragraph exclusively relate to a Count previously dismissed and are therefore not answered.

Rental Caps

38. The Ordinance limits the number of units within a building that may be used as either a “vacation rental” or a “shared housing unit.”

Answer: The allegations of this paragraph exclusively relate to a Count previously dismissed and are therefore not answered.

39. Specifically, the Ordinance prohibits a home from being used as a “vacation rental” or “shared housing unit” if it is a dwelling unit in a building with five or more units and “more than six dwelling units in the building, or one-quarter of the total dwelling units in the building, whichever is less, are or will be used” as either a “vacation rental” or a “shared housing unit.” Chi. Muni. Code §§ 4-6-300(h)(10), 4-14-060(f).

Answer: The allegations of this paragraph exclusively relate to a Count previously dismissed and are therefore not answered.

40. Similarly, the Ordinance prohibits a home in a building with four or fewer units from being used as a vacation rental or a shared housing unit if another short term rental is already registered in the same building. Chi. Muni. Code §§ 4-6-300(h)(9); 4-14-060(e).

Answer: The allegations of this paragraph exclusively relate to a Count previously dismissed and are therefore not answered.

Noise Rules

41. The Ordinance provides that a vacation rental license or shared housing unit registration may be suspended if a unit has been the situs of certain “objectionable conditions” on three or more occasions, while rented to guests. Chi. Muni. Code §§ 4-6-300(j)(2)(ii), 4-14080(c)(2).]

Answer: The allegations of this paragraph exclusively relate to a Count previously dismissed and are therefore not answered.

42. The “objectionable conditions” that can lead to a license or registration suspension include, among others, “excessive loud noise,” defined as “any noise, generated from within or having a nexus to the rental of the shared housing unit [*sic*], between 8:00 P.M. and 8:00 A.M., that is louder than average conversational level at a distance of 100 feet or more, measured from the property line of the vacation rental.” Chi. Muni. Code §§ 4-6-300(j)(2)(ii), 4-14-080(c)(2).

Answer: The allegations of this paragraph exclusively relate to a Count previously dismissed and are therefore not answered.

43. The Ordinance does not define “average conversational level.” This term is vague, unintelligible, and provides no limits to, or guidelines for, the exercise of official discretion when determining what “level” is “average.”

Answer: The allegations of this paragraph exclusively relate to a Count previously dismissed and are therefore not answered.

44. The Ordinance imposes no such noise rule, or any equivalent rule, on other rental entities regulated by this or any other Ordinance. The Chicago Municipal Code sections restricting noise in general (which apply to entities the Ordinance defines as “bed-and-breakfast establishments” or “hotel accommodations”) specifically exempt “noise created by unamplified human voices.” Chi. Muni. Code §§ 8-32-150, 8-32-170. The Ordinance, however, contains no similar exemption for unamplified human voices in vacation rentals or shared housing units. Further, the restrictions on noise in bed-and-breakfasts or hotels apply to noise “on the public way” or “on any private open space,” not noise “within or having a nexus to” a particular property.

Answer: The allegations of this paragraph exclusively relate to a Count previously dismissed and are therefore not answered.

Discriminatory Taxation

45. The Ordinance imposes an extra 4 percent tax on “vacation rentals” and “shared housing units” that it does not impose on other rentals the Ordinance defines as “hotel accommodations.”

Answer: City admits that the Ordinance imposes a surcharge upon the rental or leasing of any vacation rental or shared housing unit in the City of Chicago at a rate of 4% of the gross rental or leasing charge. City admits that this surcharge does not apply to other hotel accommodations. All remaining allegations of paragraph 45 are denied.

46. The subsequent Amendment imposes an additional 2 percent tax on “vacation rentals” and “shared housing units” that it does not impose on other rentals the Ordinance defines as “hotel accommodations.”

Answer: City admits that the Amendment imposes an additional surcharge upon the rental or leasing of any vacation rental or shared housing unit in the City of Chicago at a rate of 2% of the gross rental or leasing charge. City admits that this surcharge does not apply to other hotel accommodations. All remaining allegations of paragraph 46 are denied.

47. The Ordinance defines "hotel accommodations" to include “a room or rooms in any building or structure kept, used, or maintained as, or advertised or held out to the public to be an inn, motel, hotel, apartment hotel, lodging house, bed-and-breakfast establishment, vacation rental, . . . shared housing unit, dormitory, or similar place, where sleeping, rooming, office, conference or exhibition accommodations are furnished for lease or rent, whether with or without meals.” Chi. Muni. Code § 3-14-020(A)(4).

Answer: City admits that the Ordinance, via amendment to the Chicago Municipal Code, defines the term “hotel accommodations.” City denies that Plaintiffs have fully cited this definition. City denies all remaining allegations of paragraph 47.

48. The Code imposes a 4.5 percent tax on the gross rental or leasing charge for any hotel accommodation in the City, and also imposes additional taxes of 4 percent plus 2 percent (for a total of 6 percent) of gross rental or leasing charges for any “vacation rental” or “shared housing unit.” Chi. Muni. Code § 3-24-030. These additional taxes of 4 percent and 2 percent apply *only* to vacation rentals and shared housing units. They do not apply to any other “hotel accommodations,” such as inns, hotels, motels, lodging houses, or “bed-and-breakfast establishments.”

Answer: City admits that the Code imposes a hotel tax upon the rental or leasing of any hotel accommodations in the City of Chicago, at the rate of 4.5% percent of the

gross rental or leasing charge. City admits that the Code imposes a surcharge upon the rental or leasing of any vacation rental or shared housing unit in the City of Chicago at a rate of 4% of the gross rental or leasing charge. City admits that, as of December 1, 2018, the Code also will impose a surcharge upon the rental or leasing of any vacation rental or shared housing unit in the City of Chicago at a rate of 2% of the gross rental or leasing charge. City admits that these surcharges do not apply to the rental of other hotel accommodations, such as inns, hotels, motels, lodging houses, or bed-and-breakfast establishments. All remaining allegations of paragraph 48 are denied.

Discriminatory Fees

49. The Ordinance imposes different fees on “vacation rentals” and “shared housing units” than it imposes on other entities that the Ordinance defines as “hotel accommodations.”

Answer: City admits that in order to operate a vacation rental in Chicago, one must obtain a regulated business license from the City authorizing the owner of a dwelling unit to rent or lease such dwelling unit as a vacation rental and that this license costs \$250 and must be renewed every 2 years. City admits that in order to be a shared housing unit host for more than one shared housing unit, one must obtain a regulated business license from the City which costs \$250 and must be renewed every 2 years. City denies all remaining allegations of paragraph 49.

50. To operate a hotel in Chicago, one must obtain a regulated business license from the City. Chi. Muni. Code § 4-6-180(b). That license costs \$250, plus \$2.20 per room, Chi. Muni. Code § 4-5-010(3), and must be paid every 2 years. Chi. Muni. Code § 4-5-010.

Answer: City admits that to operate a hotel in Chicago, one must obtain a regulated business license from the City but denies that this requirement is set forth in

Chicago Municipal Code Section 4-6-180(b). The remaining allegations of paragraph 50 are admitted.

51. To operate a “bed-and-breakfast establishment” in Chicago, one must obtain a regulated business license to engage in the business of bed-and-breakfast establishment from the City. Chi. Muni. Code § 4-6-290(b). Such a license costs \$250, Chi. Muni. Code 4-5-010(2), and must be paid every two years. Chi. Muni. Code § 4-5-010.

Answer: City admits that in order to operate a “bed-and-breakfast establishment” in Chicago, one must obtain a regulated business license but denies that this requirement is set forth in Municipal Code Section 4-6-290(b). The remaining allegations of paragraph 51 are admitted.

52. To operate a “vacation rental” in Chicago, one must obtain a regulated business license from the City authorizing the owner of a dwelling unit to rent or lease such dwelling unit as a vacation rental. Chi. Muni. Code § 4-6-300(b). Such a license costs \$250, Chi. Muni. Code 4-5-010(2), and must be paid every 2 years. Chi. Muni. Code § 4-5-010. A separate license is required for each dwelling unit used as a "vacation rental." Chi. Muni. Code § 4-6-300(d)(1).

Answer: City admits that in order to operate a vacation rental in Chicago, one must obtain a regulated business license from the City authorizing the owner of a dwelling unit to rent or lease such dwelling unit as a vacation rental, but denies that this requirement is set forth in Municipal Code Section 4-6-300(b). City admits that a separate license is required for each dwelling unit used as a vacation rental, but denies that this requirement is set forth in Municipal Code Section 4-6-300(d)(1). The remaining allegations of paragraph 52 are admitted.

53. Unlike the owner of a “vacation rental,” the owner or tenant of a single “shared housing unit” is *not* required to obtain a license or paying a licensing fee to the City. Instead, a “short term residential rental intermediary” must register annually with the City on behalf of the tenant or owner. Chi. Muni. Code § 4-13-230(a). In addition, the “short term residential rental intermediary” must pay a \$10,000 license fee plus \$60 for each “short term residential” rental listed on its “platform.” Chi. Muni. Code § 4-5-010(36).

Answer: City admits that an owner or tenant of a single shared housing unit is not required to obtain a license or pay a licensing fee to the City in order to rent out that unit as a shared housing unit. City admits that short term residential rental intermediaries are required to register annually with the City on behalf of those who rent out their unit via the intermediary's platform. City admits the third sentence of paragraph 53. All remaining allegations of paragraph 53 are denied.

54. Further, any person who is a "shared housing unit" host for more than one dwelling unit ("Shared Housing Unit Operator") must obtain a license. Chi. Muni. Code § 4-16-200. A shared housing unit operator license costs \$250, Chi. Muni. Code § 4-5-010(38), and must be renewed every two years. Chi. Muni. Code § 4-5-010.

Answer: City admits the allegations of paragraph 54.

Injuries to Plaintiffs

55. Plaintiffs Leila Mendez and Alonso Zaragoza use the Airbnb platform to rent out rooms in their homes in Chicago. Accordingly, they are subject to Ordinance's rules that apply to homeowners who rent out their homes as "shared housing units."

Answer: City lacks knowledge sufficient to form a belief as to the truth of these allegations.

56. Because they rent out rooms in their respective homes as "shared housing units," Ms. Mendez and Mr. Zaragoza will be subject to warrantless searches of their homes as set forth above; they also must comply with — and will be subject to having their shared housing unit registrations revoked for violations of — the "excessive noise" rules described above.

Answer: City denies the allegations of paragraph 56.

57. In addition, Mr. Zaragoza would like to use the Airbnb platform to rent out a dwelling unit in a three-unit residential building he owns in Chicago; because the unit is not his primary residence, however, the Ordinance prohibits him from doing so.

Answer: City lacks knowledge sufficient to form a belief as to the truth of these allegations.

58. As Chicago residents and homeowners, Plaintiffs Mendez and Zaragoza pay sales taxes and property taxes to the City of Chicago.

Answer: City lacks knowledge sufficient to form a belief as to the truth of these allegations.

59. The City uses public funds, including general revenue funds, to implement and enforce all of the foregoing provisions of the Ordinance.

Answer: City admits that one use of funds from the general revenue fund is the implementation and enforcement of the Ordinance. All other allegations of paragraph 59 are denied.

60. Accordingly, Plaintiffs are injured when the City of Chicago uses public funds, which they will be liable to replenish as Chicago taxpayers, for an unconstitutional or otherwise illegal activity.

Answer: City denies the allegations of paragraph 60.

Count I

**The Ordinance authorizes unreasonable searches and invasions of privacy.
(Illinois Constitution Article I, Section 6)**

Paragraphs 61 through 67.

Answer: Count I has been dismissed and does not necessitate an answer.

Count II

**The Ordinance’s “primary residence” requirement violates substantive due process.
(Illinois Constitution Article I, Section 2)**

Paragraphs 68 through 87.

Answer: Count II has been dismissed and does not necessitate an answer.

Count III

**The Ordinance’s Primary Residence Rule violates the right to equal protection under the law.
(Illinois Constitution Article I, Section 2)**

Paragraphs 88 through 96.

Answer: Count III has been dismissed and does not necessitate an answer.

Count IV

**The Ordinance’s rental cap violates substantive due process.
(Illinois Constitution Article I, Section 2)**

Paragraphs 97 through 107.

Answer: Count IV has been dismissed and does not necessitate an answer.

Count V

**The Ordinance’s authorization of license revocation for “excessive loud noise”
violates substantive due process because it is vague.
(Illinois Constitution Article I, Section 2)**

Paragraphs 108 through 118.

Answer: Count V has been dismissed and does not necessitate an answer.

Count VI

**The Ordinance’s authorization of license revocation for “excessive loud noise”
violates the right to equal protection under the law.
(Illinois Constitution Article I, Section 2)**

Paragraphs 119 through 126.

Answer: Count VI has been dismissed and does not necessitate an answer.

COUNT VII
The Ordinance's taxes and fees violate the Uniformity Clause of the Illinois Constitution.
(Illinois Constitution Article IX, Section 2)

127. Plaintiffs reallege the foregoing paragraphs of this Complaint as though fully set forth herein.

Answer: City repeats its answers to each of the paragraphs re-alleged for paragraph

128. The Uniformity Clause, Article IX, Section 2, of the Illinois Constitution provides:

In any law classifying the subjects or objects of non-property taxes or fees, the classes shall be reasonable and the subjects and objects within each class shall be taxed uniformly. Exemptions, deductions, credits, refunds and other allowances shall be reasonable.

Answer: City admits the allegations of paragraph 128.

129. To comply with the Uniformity Clause, a tax must: (1) be based on a “real and substantial” difference between those subject to the tax and those that are not; and (2) “bear some reasonable relationship to the object of the legislation or to public policy.” *Arangold Corp. v. Zehnder*, 204 Ill. 2d 142, 150 (2003).

Answer: The allegations of paragraph 129 state a legal conclusion and are therefore denied.

Discriminatory Tax

130. The City of Chicago imposes a 4% tax — in addition [to] the City's hotel tax — on the class of taxpayers who stay in vacation rentals or shared housing units in Chicago.

Answer: City denies that there is a “class of taxpayers” who stay in vacation rentals or shared housing units in Chicago. City admits that the Code imposes a surcharge upon the rental or leasing of any vacation rental or shared housing unit in the City of Chicago at a rate of 4% of the gross rental or leasing charge. City admits that the Code imposes a hotel tax upon the rental or leasing of any hotel

accommodations in the City of Chicago, at the rate of 4.5% percent of the gross rental or leasing charge. All remaining allegations of paragraph 130 are denied.

131. The City of Chicago does not impose that extra 4% tax on the class of taxpayers: who stay at Chicago establishments other than vacation rentals and shared housing units that are included in the City's definition of "hotel accommodations," such as hotels and bed-and-breakfasts.

Answer: City denies that there is a "class of taxpayers" who stay at Chicago establishments other than vacation rentals and shared housing units. City admits that the Code imposes a surcharge upon the rental or leasing of any vacation rental or shared housing unit in the City of Chicago at a rate of 4% of the gross rental or leasing charge. City admits that the Code also imposes a hotel tax upon the rental or leasing of any hotel accommodations in the City of Chicago, at the rate of 4.5% percent of the gross rental or leasing charge. All remaining allegations of paragraph 131 are denied.

132. The City of Chicago also imposes an additional 2% tax – in addition [to] the City's hotel tax – on the class of taxpayers who stay in vacation rentals or shared housing units in Chicago.

Answer: City denies that there is a "class of taxpayers" who stay in vacation rentals and shared housing units. City admits that the Code imposes a surcharge upon the rental or leasing of any vacation rental or shared housing unit in the City of Chicago at a rate of 2% of the gross rental or leasing charge. City admits that the Code also imposes a hotel tax upon the rental or leasing of any hotel accommodations in the City of Chicago, at the rate of 4.5% percent of the gross rental or leasing charge. All remaining allegations of paragraph 132 are denied.

133. The City of Chicago does not impose that extra 2% tax on the class of taxpayers: who stay at Chicago establishments other than vacation rentals and shared housing units that are included in the City's definition of "hotel accommodations," such as hotels and bed-and-breakfasts.

Answer: City denies that there is a "class of taxpayers" who stay at Chicago establishments other than vacation rentals and shared housing units. City admits that the Code imposes a surcharge upon the rental or leasing of any vacation rental or shared housing unit in the City of Chicago at a rate of 2% of the gross rental or leasing charge. All remaining allegations of paragraph 133 are denied.

134. There are individuals who are members of the first class of taxpayers who are not members of the second class of taxpayers: *i.e.*, some individuals stay (and pay taxes) only at vacation rentals or shared housing units in Chicago, and some individuals stay (and pay taxes) only at hotels, bed-and-breakfasts, or other "hotel accommodations" that are not vacation rentals or shared housing units.

Answer: City denies the allegations of paragraph 134.

135. For purposes of taxation, there is no real and substantial difference between vacation rentals and shared housing units — whose guests are subject to additional taxes of 4% and 2% (for a total of 6%) — and other establishments included in the definition of "hotel accommodations," whose guests are not subject to that tax.

Answer: City denies the allegations of paragraph 135.

136. The Code's definition of a bed-and-breakfast establishment — "an owner-occupied single-family residential building, or an owner-occupied, multiple-family dwelling unit building, or an owner-occupied condominium, townhouse, or cooperative, in which 11 or fewer sleeping rooms are available for rent or for hire for transient occupancy by registered guests," Chi. Muni. Code § 4-6-290(a) — is substantially similar to, and overlaps with, the Ordinance's definitions of vacation rentals and shared housing units, which include dwelling units with "6 or fewer sleeping rooms that are available for rent or for hire for transient occupancy by guests," Chi. Muni. Code §§ 4-6-300, 4-14-010.

Answer: City responds that the cited code provisions speak for themselves as to their content and denies any allegations of paragraph 136 inconsistent therewith. Answering further, City denies that Plaintiffs have fully quoted any of the listed definitions. City admits that the portion of Chicago Municipal Code Section 4-6-300 is quoted accurately. All remaining allegations of paragraph 136 are denied.

137. Accordingly, the City cannot justify imposing taxes of 4% and 2% on vacation rentals and shared housing units that it does not apply to bed-and-breakfast establishments.

Answer: City denies all allegations of paragraph 137.

138. In addition, the Ordinance's stated purpose of the extra 4% tax that applies only to guests of vacation rentals and shared housing units — to “fund supportive services attached to permanent housing for homeless families and to fund supportive services and housing for the chronically homeless,” Chi. Muni. Code § 3-24-030(B) — does not bear any reasonable relationship to the object of the legislation.

Answer: City denies all allegations of paragraph 138.

139. Further, the Ordinance's stated purpose of the additional 2% tax that applies only to guests of vacation rentals and shared housing units—to “fund housing and related supportive services for victims of domestic violence,” Chi. Mun. Code §3-24-030(C)— does not bear any reasonable relationship to the object of the legislation.

Answer: City denies all allegations of paragraph 139.

140. There is no reason to believe that guests of vacation rentals and shared housing units have anything to do with homelessness, let alone any reason to think that vacation rentals and shared housings units have any *greater* connection to homelessness than other traveler housing accommodations, such as hotels, bed-and-breakfast establishments, or even non-commercial activities such as staying in a friend's guest room.

Answer: City denies all allegations of paragraph 140.

141. There is also no reason to believe that guests of vacation rentals and shared housing units have anything to do with domestic violence, or a connection to the availability of housing or supportive services for victims of domestic violence. Additionally, there is no reason to think that vacation rentals and shared housings units have any *greater* connection to the availability of housing or supportive services for victims of domestic violence than other traveler housing accommodations, such as hotels, bed-and-breakfast establishments, or even non-commercial activities such as staying in a friend's guest room.

Answer: City denied all allegations of paragraph 141.

142. For these reasons, the Code's discriminatory taxes that apply to only to guests of vacation rentals and shared housing units, but not to guests of other “hotel accommodations,” violate the Uniformity Clause of the Illinois Constitution.

Answer: City denies all allegations of paragraph 142.

143. The Code's additional taxes on guests of vacation rentals and shared housing units injures Plaintiff Alonso Zaragoza because guests to whom he rents out his shared housing units are required to pay it.

Answer: City denies all allegations of paragraph 143.

144. The Code's discriminatory taxation of guests of vacation rentals and shared housing units also injures Plaintiffs because they will be liable, as Chicago taxpayers, to replenish the treasury for the public funds used to implement and collect the unconstitutional tax.

Answer: City denies all allegations of paragraph 144.

Discriminatory Licensing Fees

145. For the purpose of licensing fees, there is no real and substantial difference between hotels, bed-and-breakfast establishments, vacation rentals, and shared housing units. Yet the Code applies separate licensing fees for each of these hotel accommodations. *See ¶¶ 54-59.*

Answer: City denies all allegations of paragraph 145.

146. The license for a hotel costs \$250, plus \$2.20 per room, Chi. Muni. Code § 4-5-010(3), and must be paid every 2 years. Chi. Muni. Code § 4-5-010.

Answer: City admits the allegations of paragraph 146.

147. A license for a "bed-and-breakfast establishment" costs \$250, Chi. Muni. Code 4-5-010(2), and must be paid every two years. Chi. Muni. Code § 4-5-010.

Answer: City admits the allegations of paragraph 147.

148. A license for a "vacation rental" costs \$250, Chi. Muni. Code 4-5-010(2), and must be paid every 2 years. Chi. Muni. Code § 4-5-010.

Answer: City admits the allegations of paragraph 148.

149. The owner or tenant of a single "shared housing unit" is *not* required to obtain a license or pay a licensing fee to the City. Instead, a "short term residential rental intermediary" must register annually with the City on behalf of the tenant or owner. Chi. Muni. Code § 4-13-230(a). In addition, the "short term residential rental intermediary" must pay a \$10,000 license fee plus \$60 for each "short term residential" rental listed on its "platform." Chi. Muni. Code § 4-5-010(36).

Answer: City admits that an owner or tenant of a single shared housing unit is not required to obtain a license or pay a licensing fee to the City in order to rent out

that unit as a shared housing unit. City admits that short term residential rental intermediaries are required to register annually with the City on behalf of those who rent out their unit via the intermediary's platform. City admits the third sentence of paragraph 149. All remaining allegations of paragraph 149 are denied.

150. Any person who is a "shared housing unit" host for more than one dwelling unit ("Shared Housing Unit Operator") must obtain a license. Chi. Muni. Code § 4-16-200. A shared housing unit operator license costs \$250, Chi. Muni. Code § 4-5-010(38), and must be renewed every two years. Chi. Muni. Code § 4-5-010.

Answer: City admits the allegations of paragraph 150.

151. The Ordinance's different fee schemes for vacation rentals and shared housing units are especially unjustifiable because the Code's definitions of the two types of rentals are virtually identical.

Answer: City denies all allegations of paragraph 151.

152. In addition, the fees' purpose does not bear any reasonable relationship to the object of the Ordinance because there can be no legitimate purpose in charging different registration fees for such similar uses.

Answer: City denies all allegations of paragraph 152.

153. For these reasons, the Code's imposition of different registration fees on similar types of hotel accommodations violates the Uniformity Clause of the Illinois Constitution.

Answer: City denies all allegations of paragraph 153.

154. The Code's discriminatory fees for vacation rentals and shared housing units injure Plaintiffs because they will be liable, as Chicago taxpayers, to replenish the treasury for the public funds used to implement and collect the unconstitutional fees.

Answer: City denies all allegations in paragraph 154.

**FIRST AFFIRMATIVE DEFENSE
(Lack of Standing)**

The tax challenged in this Second Amended Complaint applies to guests of vacation rentals and shared housing units. Plaintiffs, however, are not alleged to be guests of either

vacation rentals or shared housing units. As such, Plaintiffs have suffered no damage and therefore lack standing to challenge the tax.

WHEREFORE, the City of Chicago asks the Court to enter judgment in its favor and against Plaintiffs on Count VII of their Second Amended Complaint, along with such further relief as may be appropriate.

Respectfully submitted,

CITY OF CHICAGO

By: /s/ Jason L. Rubin
Jason L. Rubin
Weston Hanscom
Attorneys for
Defendants

Weston Hanscom
Deputy Corporation Counsel
City of Chicago Law Department
Revenue Litigation Division
30 N. LaSalle, Suite 1020
Chicago, IL 60602
(312) 744-9077

Jason Rubin
Senior Counsel
City of Chicago Law Department
Revenue Litigation Division
30 N. LaSalle, Suite 1020
Chicago, IL 60602
(312) 744-4174

CERTIFICATE OF SERVICE

I, Jason Rubin, an attorney, hereby certify that on October 4, 2018, I served the foregoing City of Chicago Answer to Second Amended Complaint on Plaintiffs' counsel by electronic mail sent to:

Jeffrey Schwab
Liberty Justice Center
Cook County No. 49098
190 S. LaSalle Street, Suite 1500
Chicago, Illinois 60603
(312) 26307668
jschwab@libertyjusticecenter.org

Jacob Huebert (#6305339)
Timothy Sandefur (#6325089/ pro hac vice #61192)
Christina Sandefur (#6325088/ pro hac vice #61186)
500 E. Coronado Road
Phoenix, Arizona 85004
(602) 462-5000
(602) 256-7045 (fax)
jhuebert@goldwaterinstitute.org
tsandefur@goldwaterinstitute.org
csandefur@goldwaterinstitute.org

Exhibit R

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

LEILA MENDEZ and ALONSO ZARAGOZA,)	
)	
Plaintiffs,)	Case No. 16 CH 15489
)	
v.)	Judge Sanjay T. Tailor
)	
CITY OF CHICAGO, et al.,)	
)	
Defendants.)	
)	

STIPULATIONS

Plaintiffs Leila Mendez and Alonso Zaragoza and Defendants City of Chicago and Rosa Escareno hereby stipulate to the following facts, which are not in dispute in the above-captioned matter:

1. The document Defendants produced to Plaintiffs Bates numbered D000772-D000808 is a true and accurate copy of a spreadsheet produced by the City of Chicago Department of Business Affairs and Consumer Protection, which lists all 311 complaints from either phone calls or online the City received from December 27, 2016 through December 3, 2019, that either the 311 staff (in the case of calls) or the complainant (in the case of online) categorized as relating to shared-housing units or vacation rentals, hereinafter referred to as the “First Spreadsheet.”

2. The “Able to contact complaining witness” column in the First Spreadsheet indicates whether the City was able to contact the individual who made the 311 complaint in question.

3. The “Form Received” column in the First Spreadsheet indicates whether the individual who made the 311 complaint in question returned a complaint form provided by the

City in response to the complaint..

4. The “Enforcement Issued” column in the First Spreadsheet indicates whether the 311 complaint resulted in an enforcement action related to the property identified.

5. Defendants produced a spreadsheet Bates numbered D000809-D000813 subject to a protective order entered by the Court on November 7, 2019, hereinafter referred to as the “Second Spreadsheet.”

6. The Second Spreadsheet lists each 311 call or online complaint from the First Spreadsheet that resulted in an enforcement action and has a total of 40 entries.

7. For each enforcement action listed on the Second Spreadsheet, the “Licensed or registered unit at time of inv” column indicates whether the property in question was licensed by the City of Chicago as a vacation rental or registered with the City of Chicago as a shared housing unit at the time the City investigated the complaint.

8. Of the 40 entries on the Second Spreadsheet, 11 have a “Yes” in the “Licensed or registered unit at time of inv” column; all other entries have a “No” in that column.

9. In addition, the Second Spreadsheet includes three entries with a “No” in the “Licensed or registered unit at time of inv” column, but the “Notes” column states that a particular unit at the address in question, not identified in the complaint, was registered at the time.

10. Of the 14 entries referenced in Stipulations Nos. 8 and 9 above, 11 pertain to alleged nuisances, such as excessive noise. The other three allege, respectively: (1) “concern about possible vacation rental within [the complaining party’s] building”; (2) “Our building prohibits Airbnb. An owner has listed despite being prohibited”; and (3) “owner does not live on premises.”

11. The 14 entries references in Stipulations Nos. 8 and 9 above include complaints regarding a total of nine different addresses in the City of Chicago.

12. The 11 nuisance-related entries referenced in Stipulation No. 10 above include complaints regarding a total of six different addresses in the City of Chicago.

13. The parties agree that these stipulations are not subject to protective order the Court entered on November 7, 2019, and may be cited in, or attached to, briefs submitted to the Court in the above-captioned matter without being filed under seal.

14. These stipulations do not constitute an admission by Defendants that any facts set forth above are relevant to any claim or defense in this matter.

Dated: January 15, 2020

Respectfully submitted,

LEILA MENDEZ and ALONSO
ZARAGOZA

CITY OF CHICAGO and ROSA
ESCARENO

By: /s/ Jacob Huebert
One of Their Attorneys

By: /s/ Jason L. Rubin
One of Their Attorneys

Liberty Justice Center
Cook County No. 49098
Jeffrey Schwab (#6290710)
190 S. LaSalle Street, Suite 1500
Chicago, Illinois 60603
(312) 263-7668
(312) 263-7702 (fax)
jschwab@libertyjusticecenter.org

Goldwater Institute
Jacob Huebert (#6305339)
Timothy Sandefur (#6325089/ pro hac vice
#61192)
Christina Sandefur (#6325088/ pro hac vice

Weston Hanscom
Richard Danaher
Jason Rubin
City of Chicago, Department of Law
Revenue Litigation Division
30 North LaSalle Street, Suite 1020
Chicago, Illinois 60602
(312) 744-9077/742-0465/744-4174
Weston.Hanscom@cityofchicago.org
Richard.Danaher@cityofchicago.org
Jason.Rubin@cityofchicago.org
Attorney No. 90909

#61186)
500 E. Coronado Road
Phoenix, Arizona 85004
(602) 462-5000
(602) 256-7045 (fax)
jhuebert@goldwaterinstitute.org
tsandefur@goldwaterinstitute.org
csandefur@goldwaterinstitute.org

Exhibit S

Service Request Number	Created Date	Service Request Address	Service Request: Type Name	Flex Answers Concatenated	Able to contact complaining witness	Form Received	Enforcement Issued
16-08484284	12/27/2016	2040 W 21ST ST	Shared Housing / Vacation Rental Complaints	Guest Staying in Rental Property - Other - People renting downstairs blocking porch exit with their stuff - Shared Housing (e.g., AIRBNB) - DEC 05, 2016 - Don't Know	Yes	No	No
17-00084120	1/5/2017	1319 W FILLMORE ST	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - Condition of Property (i.e., dirty, poor condition, etc.),Unlicensed Rental Property,License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Shared Housing (e.g., AIRBNB) - DEC 30, 2016	Yes	No	No
17-00291096	1/16/2017	175 E DELAWARE PL	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Other - property is on the prohibited building list - JAN 16, 2017/listing number 11011715 - Shared Housing (e.g., AIRBNB) - Don't Know	Yes	No	No
17-00362332	1/20/2017	10633 S GREEN BAY AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Other - Several families living in a single family home - Not Applicable - JAN 20, 2017	NA	NA	No
17-00902129	2/17/2017	1333 S WABASH AVE	Shared Housing / Vacation Rental Complaints	etc.),Unlicensed Rental Property,License Rules Violations (i.e., prohibited business list, owner does not live on premises) - https://www.vrbo.com/4434210ha - Not Applicable - FEB 17, 2017 - Don't Know	No	NA	No
17-00912193	2/18/2017	7650 N SHERIDAN RD	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.) - Shared Housing (e.g., AIRBNB) - DEC 20, 2016 [REDACTED]	Yes	No	No
17-01037449	2/23/2017	4758 S DR MARTIN LUTHER KING JR DR	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Unlicensed Rental Property - Not Applicable - in apt # 2 - renting out condo unit - FEB 17, 2017	No	NA	No
17-01135417	2/28/2017	4837 N KENNETH AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Condition of Property (i.e., dirty, poor condition, etc.) - Garage and front yard is littered in trash - Not Applicable - FEB 26, 2017 - Don't Know - [REDACTED]	Yes	No	No
17-01156529	3/1/2017	2509 W FULLERTON AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises),Unlicensed Rental Property - Not Applicable - Don't Know - FEB 27, 2017 - CALLER STATES THE RENTAL IS FOR A FIRST FLOOR COMMERCIAL SPACE, AND THE FIRST FLOOR HAS NO WINDOWS..COMMERCIAL SPACE SHOULD NOT BE USED AS RENTAL.	Yes	No	No
17-01381417	3/13/2017	4624 S INDIANA AVE	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - ,Condition of Property (i.e., dirty, poor condition, etc.),Other - Rodent infestation there is some type of fleas in shower - Shared Housing (e.g., AIRBNB) - FEB 02, 2016	Yes	No	No

17-01498325	3/19/2017	2408 W FARRAGUT AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises), Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - MAR 16, 2017 - OWNER OF CONDO UNIT #2A DAN AND JESSICA DYE ARE RENTING OUT UNIT - Don't Know - PLS KEEP CALLERSINFO CONFIDENTIAL	NA	NA	No
17-01808471	3/30/2017	2408 W FARRAGUT AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Unlicensed AirBnB, also in violation of assoc. rules and prohibited buildings list - Not Applicable - MAR 30, 2017 - Don't Know - www.aribnb.com - condominium	Yes	Yes	No
17-01815253	3/30/2017	2408 W FARRAGUT AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Shared Housing (e.g., AIRBNB) - MAR 25, 2017 - Don't Know - [REDACTED]	Yes	No	No
17-01816458	3/30/2017	2408 W FARRAGUT AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Shared Housing (e.g., AIRBNB) - MAR 15, 2017 - Don't Know - [REDACTED]	Yes	No	No
17-02090206	4/10/2017	55 E WASHINGTON ST	Shared Housing / Vacation Rental Complaints	- Vacation Rentals and Travel - APR 05, 2017 - Credit Card - Receipt - [REDACTED]	Yes	No	No
17-02114652	4/11/2017	11321 S CHAMPLAIN AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Unlicensed Rental Property - listed Dig Tt bed and breakfast on Facebook, owner Michael McGraw does not have license - Bed and Breakfast - MAR 31, 2017 - [REDACTED]	Yes	No	No
17-02118215	4/11/2017	53 W BURTON PL	Shared Housing / Vacation Rental Complaints	ORIGINAL BACP SR #17-02012174 - RESIDENTIAL - COMMERCIAL BUILDING - THERE ARE MULTIPLE AIRBNB OPERATING OUT OF THIS APARTMENT BUILDING. THEY ARE A GREAT PROBLEM WITH ALL NEIGHBORS DAILY. MONDAY, TUESDAY, WEDNESDAY, THURSDAY, FRIDAY, SATURDAY, SUNDAY - THE TOURISTS ARE THERE ALL THE TIME - [REDACTED] - Vacation Rentals and Travel	Yes	No	No
17-02137889	4/12/2017	5040 N MARINE DR	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Unlicensed Rental Property - UNIT-D7 IS IN THE PROHIBITED LIST CONDO LIST PER PROPERTY MANAGER- OWNERS SON IS RENTING THE UNIT AS AIRBNB- Shared Housing (e.g., AIRBNB) - APR 7, 2017	Yes	No	No
17-02191550	4/13/2017	500 E 51ST ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Other - possible bedbug infestation - Not Applicable - APR 11, 2017 - Don't Know	No	NA	No
17-02191555	4/13/2017	7415 S COLFAX AVE	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - Other - bed bug infestation - Not Applicable - APR 10, 2017	Yes	No	No

17-02357610	4/20/2017	2408 W FARRAGUT AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Illegal, unlicensed AirBnB rental in a prohibited building. This is ongoing since last Spring. - Not Applicable - APR 15, 2017	NA	NA	No
17-02445863	4/23/2017	5655 N ARTESIAN AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.) - excessive drinking and drug use - Shared Housing (e.g., AIRBNB) - APR 22, 2017 - Don't Know - [REDACTED]	Yes	No	No
17-02569540	4/27/2017	1409 W DIVERSEY PKWY	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - Other - Bed Bugs - Shared Housing (e.g., AIRBNB) - FEB 25, 2017 - [REDACTED]	Yes	No	No
17-02695836	5/2/2017	12420 S NORMAL AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.) - He has a dog that begins barking at 7 am continues for the next 30 minutes started Saturday and has continued since like clockwork - Not Applicable - APR 29, 2017	Yes	No	No
17-02720570	5/3/2017	2408 W FARRAGUT AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - APR 29, 2017	NA	NA	No
17-02972156	5/11/2017	2408 W FARRAGUT AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Unlicensed Rental Property - Not Applicable - MAY 11, 2017 - Don't Know	NA	NA	No
17-03032233	5/13/2017	2408 W FARRAGUT AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Not Applicable - MAY 12, 2017 - Don't Know	NA	NA	No
17-03044731	5/13/2017	2408 W FARRAGUT AVE	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - Condition of Property (i.e., dirty, poor condition, etc.), Excessive Noise (i.e., loud parties, foot traffic in & out, etc.), License Rules Violations (i.e., prohibited business list, owner does not live on premises) - I live in the building next to 2408 W. Farragut Ave apt 2 a. There is an illegal Airbnb being run in that unit. The tenants are loud and the owner of the unit is never there. They leave garbage all over their back porch so they add to our rat problem. The owner is very defiant and angry when these issues are brought to his attention. Please help. This is a condominium, not a hotel. - Shared Housing (e.g., AIRBNB) - MAY 12, 2017 - Don't Know	NA	NA	No
17-03089990	5/15/2017	2408 W FARRAGUT AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - ,Excessive Noise (i.e., loud parties, foot traffic in & out, etc.), Unlicensed Rental Property, License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Vacation Rental (e.g., VRBO) - MAY 12, 2017 - Don't Know	Yes	No	No
17-03130267	5/16/2017	325 N AUSTIN BLVD	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Condition of Property (i.e., dirty, poor condition, etc.) - Bed Bug infestation - Not Applicable - MAY 15, 2017	Yes	No	No

17-03131557	5/16/2017	2235 N CLIFTON AVE	Shared Housing / Vacation Rental Complaints	ORIGINAL BACP SR #17-02870007 - Residential - HOME - 2235 N Clifton Unit# C - Unregistered Air Bnb - [REDACTED] - 10 PM - Unregistered Air BnB. Giant parties are being held, with lots of booze and weed. - Vacation Rentals and Travel. (HAS BEEN REF'D TO POLICE FOR PARTIES WITH "BOOZE & WEED"; NEW SR #17-03090687)	No	NA	No
17-03310457	5/23/2017	2408 W FARRAGUT AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Other - Airbnb in prohibited building - Not Applicable - MAY 12, 2017	NA	NA	No
17-03568028	5/31/2017	1430 N DEARBORN ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),Unlicensed Rental Property - Apartment 314 - Not Applicable - APR 28, 2017	Yes	No	No
17-03568084	5/31/2017	1430 N DEARBORN ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),Unlicensed Rental Property - Apartment 314 - Not Applicable - APR 29, 2017	NA	NA	No
17-03589252	6/1/2017	1437 N NORTH PARK AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Unlicensed Rental Property,License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Owner of the condo unit 3 at this address, Greg Volynskiy, is renting his unit out as an air bnb against our condo declarations. I have asked him to stop, but he has indicated he has rentals through august that he will not cancel. He does not have a license as our declarations forbid this activity. - Shared Housing (e.g., AIRBNB) - MAY 26, 2017 - [REDACTED] HTTPS://WWW.AIRBNB.COM/ROOMS/18444127?s=51	Yes	Yes	No
17-03645648	6/3/2017	2605 N MERRIMAC AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - JUN 2, 2017	Yes	Yes	No
17-03882155	6/12/2017	1430 N DEARBORN ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),Unlicensed Rental Property - Apartment 314 - Not Applicable - APR 30, 2017	NA	NA	No
17-03893054	6/12/2017	5058 N RAVENSWOOD AVE W	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.) - Only one date can be listed below but it has happened every single weekend, since 5/19/17 - Not Applicable - JUN 09, 2017 - [REDACTED] Owners Joanne Carava and Collette Manning purchased and remodeled this home for the sole purpose of vacation renting.	Yes	Yes	No
17-03906133	6/13/2017	1250 S INDIANA AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Shared Housing (e.g., AIRBNB) - JUN 12, 2017 - Don't Know	Yes	No	No
17-03913061	6/13/2017	1430 N DEARBORN ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),Unlicensed Rental Property - Apartment 314 - Not Applicable - MAY 06, 2017	NA	NA	No
17-03930203	6/14/2017	5058 N RAVENSWOOD AVE W	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Unlicensed Rental Property, LOUD - PIN NUMBER 14074070160000 - Shared Housing (e.g., AIRBNB) - JUN 14, 2017 - Don't Know	NA	NA	No

17-03940718	6/14/2017	1430 N DEARBORN ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),Unlicensed Rental Property - Apartment 314 - Not Applicable - MAY 07, 2017 - Don't Know	NA	NA	No
17-03983592	6/16/2017	1430 N DEARBORN ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),Unlicensed Rental Property - Apartment 314 - Not Applicable - MAY 08, 2017	NA	NA	No
17-03983601	6/16/2017	1430 N DEARBORN ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),Unlicensed Rental Property - Apartment 314 - Not Applicable - MAY 10, 2017	NA	NA	No
17-04048270	6/19/2017	1430 N DEARBORN ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),Unlicensed Rental Property - Apartment 314 - Not Applicable - MAY 12, 2017	NA	NA	No
17-04048335	6/19/2017	1430 N DEARBORN ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),Unlicensed Rental Property - Apartment 314 - Not Applicable - MAY 13, 2017	NA	NA	No
17-04116848	6/21/2017	1709 N LARRABEE ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - License Rules violations (i.e., prohibited business list, owner does not live on premises) - The owner of Unit 3N has been repeatedly told that the condo association prohibits short term rentals, yet she continues renting out her unit on Airbnb:	Yes	Yes	No
17-04209958	6/25/2017	1709 N LARRABEE ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Unlicensed Rental Property,License Rules Violations (i.e., prohibited business list, owner does not live on premises) - The condo bylaws prohibit renting, yet Yanping Jiang in Unit 3N keeps renting her place on Airbnb - Shared Housing (e.g., AIRBNB) - JUN 25, 2017 - Don't Know - [REDACTED]	NA	NA	No
17-04219734	6/26/2017	1709 N LARRABEE ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Unlicensed Rental Property,Other,License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Yanping Jiang in Unit 3N keeps renting her place on Airbnb, in violation of the condo bylaws and despite numerous complaints from other unit owners. - Shared Housing (e.g., AIRBNB) - JUN 26, 2017 - Don't Know - [REDACTED]	NA	NA	No
17-04248457	6/27/2017	1709 N LARRABEE ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Unlicensed Rental Property,Other,License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Yanping Jiang (Unit 3N), who does not live on premises, again rented her place today on Airbnb, in violation of the recorded condo bylaws and despite repeated complaints from the other unit owners - Shared Housing (e.g., AIRBNB) - JUN 27, 2017 - Don't Know - [REDACTED]	NA	NA	No
17-04389533	7/3/2017	5254 N MASON AVE	Shared Housing / Vacation Rental Complaints	ORIGINAL BACP SR #17-04159477 - Residential - HOME - Air BNB - Check listing on AirBnb -->> https://www.airbnb.com/rooms/13776474?location=5254%20N%20Mason%20Ave%2C%20Chicago%2C%20IL%2C%20United%20States&s=2mDeNgg - Vacation Rentals and Travel	Yes	No	No

17-04393483	7/3/2017	6121 N GREENVIEW AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises),Unlicensed Rental Property - APARTMENT IS ON TOP OF GARAGE WITH ONE EXIT IN BACKYARD - Shared Housing (e.g., AIRBNB) - APR 4, 2017	No	NA	No
17-04449560	7/6/2017	4854 W HENDERSON ST	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Unlicensed Rental Property - on list - Shared Housing (e.g., AIRBNB) - JUL 6, 2017	Yes	No	No
17-04524575	7/9/2017	1305 N DAMEN AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Unlicensed Rental Property - Vacation Rental (e.g., VRBO) - JUL 07, 2017 - [REDACTED] Note neighbors are renting their property using HomeAway property#4033691	Yes	No	No
17-04549186	7/10/2017	4434 S UNIVERSITY AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Ksenia Konkia is owner of unit 3N (PIN # 20-02-309-027-1006) & condo board president of a 6 unit condo building. All condo members learned on July 9th, 2017 that Ms. Ksenia has been advertising/renting her unit online via Aribnb home sharing for the last 2 years. She did NOT prior disclose to or get prior approval from the association to operate a home sharing rental business. She gave out keys to common front door without approval. Please investigate/rescind her license or registration. - Not Applicable - JUL 09, 2017 - [REDACTED]	Yes	No	No
17-04570368	7/11/2017	6101 N SHERIDAN RD	Shared Housing / Vacation Rental Complaints	Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Not Applicable - JUL 10, 2017	Yes	No	No
17-04738920	7/18/2017	5241 W PATTERSON AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - PERSON HOUSING PEOPLE FOR AIRBNB WITH NO LICENSE...HAPPENING THE LAST 3 YEARS. - JUL 18, 2017	No	NA	No
17-04960938	7/27/2017	2529 W CHARLESTON ST	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Condition of Property (i.e., dirty, poor condition, etc.),Unlicensed Rental Property,Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Shared Housing (e.g., AIRBNB) - JUN 18, 2017 - [REDACTED]	Yes	Yes	Yes

17-05148395	8/3/2017	1928 N DAMEN AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.), License Rules Violations (i.e., prohibited business list, owner does not live on premises) - CALLER IS PROPERTY MANAGER AND IS CONCERNED FOR SAFETY OF TENANTS WITH STRANGERS GOING IN AND OUT OF BLDG BECAUSE OF THE OF THE RESIDENTS HAS LISTED APT ON AIRBNB AND HIS LICENSE IS STILL PENDING - CALLER RAN INTO 2 RENTERS THAT WERE PAYING ALSO AD IS STILL POSTED ON AIRBNB - CALLER WANTS TO KNOW IF IT IS A LIST WHERE PROPERTY OWNERS CAN REGISTER AND SAY THEY DONOT WANT PROPERTY TO BE REGISTERED AS A AIRBNB PROPERTY AND CITY COULD CHECK BEFORE LICENSE IS ISSUED -- Shared Housing (e.g., AIRBNB) - JUL 28, 2017 - [REDACTED] - CALLER IS PROPERTY MANAGER AND IS CONCERNED FOR SAFETY OF TENANTS WITH STRANGERS GOING IN AND OUT OF BLDG BECAUSE ONE OF THE RESIDENTS HAS LISTED APT ON AIRBNB.	Yes	No	No
17-05248243	8/7/2017	1726 N SEDGWICK ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.) - There seem to be a large number of people - maybe 12-14? - in one unit, the 3rd floor apartment that has access to the roof deck where all of the noise and apple-throwing is coming from. - Vacation Rental (e.g., VRBO) - AUG 07, 2017 - [REDACTED]	Yes	No	No
17-05486353	8/16/2017	1750 S WABASH AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - AUG 16, 2017	Yes	No	No
17-05534284	8/18/2017	5542 S NAGLE AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Other - Too Many Occupants (diff families) reside in Single Family Residence, Attic, 1st fl, and basement, This is the 2nd time City of Chicago has been notified and nothing happens. Failure to check building occupancy is unethical conduct per city of Chicago yearly ethics guidelines/policy exam for employees. - Shared Housing (e.g., AIRBNB) - MAR 28, 2017	NA	NA	No
17-05534801	8/18/2017	5542 S NAGLE AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Other - Single family residence being occupied by several diff families/diff vehicles:white ford fusion,white jetta volkswagon,black Nissan maxima (registered in orland park) and black chevy cruze. .People live in the attic, 1st floor and basement. Several kids live there as well/hazard issue. City of Chicago has been contacted about this issue before and nothing has been done. Please be advised that the City of Chicago Inspector General Office/William Marback will be notified if no action is taken. - Shared Housing (e.g., AIRBNB) - MAR 01, 2017	NA	NA	No
17-05550977	8/19/2017	4146 S MICHIGAN AVE	Shared Housing / Vacation Rental Complaints	UNIT 1 - [REDACTED] - Concerned Citizen - Unlicensed Rental Property - RENTING APARTMENT UNIT 1 AS AN AIRBNB - Shared Housing (e.g., AIRBNB) - AUG 18, 2017	Yes	No	No

17-05747269	8/28/2017	6018 N WINTHROP AVE	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - Condition of Property (i.e., dirty, poor condition, etc.) - Bed Bugs non working refrigerator - Not Applicable - JUN 01, 2017 - [REDACTED]	Yes	No	No
17-05774561	8/29/2017	1036 N SPRINGFIELD AVE	Shared Housing / Vacation Rental Complaints	Guest Staying in Rental Property -Unit# 1Condition of Property (i.e., dirty, poor condition, etc.) - horrible hazard conditions exposed wires, bathroom cabinets hanging off walls/hinges, blood on bathroom wall, mold inside refrigerator/inside bathroom ceiling and tub, roach and black bug/not sure infestation, dining chair broken-tenant fell trying to sit, smell of raw sewage throughout 1st floor unit - Shared Housing (e.g., AIRBNB) - AUG 17, 2017 - AUG 22, 2017 -[caller has pictures of these conditions would like to have dept contact she will send them to rep] - [REDACTED]	Yes	No	No
17-05786932	8/30/2017	1001 W MADISON ST	Shared Housing / Vacation Rental Complaints	RBB #615 / POSTED BUT NOT REGISTERED - [REDACTED] - Vacation Rentals and Travel - RBB #615 ADVERTISING ON THE WEBSITE BUT NO LIC. OR REGISTRATION - AUG 30, 2017 - Cash - Other - [REDACTED]	No	NA	No
17-05884537	9/4/2017	4534 W 65TH PL	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Condition of Property (i.e., dirty, poor condition, etc.),Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),Unlicensed Rental Property - Not Applicable - SEP 04, 2017	Yes	No	No
17-05885785	9/4/2017	4500 W 65TH PL	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Other - Multiple families living in a single family home. My precinct captain stated there are 8 people with different last names. In addition, there are 6 cars parked in front and on the side of the house. - Not Applicable - SEP 04, 2017	NA	NA	No
17-05921987	9/6/2017	40 E 9TH ST	Shared Housing / Vacation Rental Complaints	Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises),Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - AUG 8, 2017 - UNIT 711 IS BEING USED AS A VACATION RENTAL - UNIT HAS BEEN ISSUED VIOLATIONS	Yes	Yes	Yes
17-05922154	9/6/2017	40 E 9TH ST	Shared Housing / Vacation Rental Complaints	Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises) - UNIT 1602 IS BEING RENTED AS AIRBNB - UNIT HAS BEEN ISSUED VIOLATIONS AND HAS BEEN FINED BY ASSOCIATION - Shared Housing (e.g., AIRBNB) - AUG 7, 2017	Yes	Yes	No
17-05922408	9/6/2017	1030 N STATE ST	Shared Housing / Vacation Rental Complaints	Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises),Unlicensed Rental Property - Newberry Plaza is a 52 story condo - Newberry Plaza is a 52 story condo building in the heart of Gold Coast. Newberry is on the list for properties that do not allow short term rentals. I found Frank's unit on AirBnB. - Shared Housing (e.g., AIRBNB) - AUG 16, 2017 - [REDACTED] - Newberry Plaza is a 52 story condo building in the heart of Gold Coast. Newberry is on the list for properties that do not allow short term rentals. I found Frank's unit, # 516, on AirBnB.	Yes	Yes	No

17-05922539	9/6/2017	5415 N SHERIDAN RD	Shared Housing / Vacation Rental Complaints	Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises),Unlicensed Rental Property - Vacation Rental (e.g., VRBO) - AIRBnB - AUG 17, 2017 - Park Tower Condo is on the Prohibited List. Unit 901 is being rented as an AIRBnB. Owner's name is Gregg Meyers.	Yes	Yes	No
17-06138818	9/14/2017	933 W BELMONT AVE	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - Condition of Property (i.e., dirty, poor condition, etc.),Other - Stayed at Hotel and received BED BUG bites all over body - Not Applicable - SEP 12, 2017 - [REDACTED]	Yes	No	No
17-06166731	9/15/2017	4331 N CENTRAL PARK AVE	Shared Housing / Vacation Rental Complaints	ORIGINAL BACP SR #17-06110824 - COMMERCIAL - RESIDENTIAL - HOME - HOSTEL / BED AND BREAKFAST - Concerned Citizen - Unlicensed Rental Property - Not Applicable - SEP 13, 2017 - Don't Know	Yes	No	No
17-06183657	9/16/2017	55 E WASHINGTON ST	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - Condition of Property (i.e., dirty, poor condition, etc.) - No lift no water, insects, no refund received even when promised. Booking.com declines responsibility. Loop Suites managers do not reply messages. - Vacation Rental (e.g., VRBO) - AUG 25, 2017 - [REDACTED]	Yes	No	No
17-06190473	9/16/2017	733 W MADISON ST	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - Condition of Property (i.e., dirty, poor condition, etc.) - Live approx. 1" cockroach found and killed in room 624 under couch, dirty desk Crowne Plaza W. Loop - Not Applicable - JUN 14, 2017 - [REDACTED]	Yes	No	No
17-06263845	9/19/2017	11 W 26TH ST	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - Other - Bedbugs - room 451 - Not Applicable - SEP 17, 2017 - [REDACTED]	Yes	No	No
17-06318927	9/21/2017	920 S CLAREMONT AVE	Shared Housing / Vacation Rental Complaints	ORIGINAL BACP SR #17-06173938 - RESIDENTIAL - HOME - OWNER IS An AIRBNB AND CALLER BELIEVES OWNER ISN'T REGISTERED AS AN AIRBNB, DOESN'T HAVE A LICENSE EITHER. (PLS NOTE THAT CW & RESPONDENT ADDRESSES MATCH.) - Concerned Citizen - Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - SEP 15, 2017 - Don't Know	Yes	No	No
17-06403244	9/25/2017	5141 W PATTERSON AVE	Shared Housing / Vacation Rental Complaints	running bed and breralfast - Neighbor - thru-out - Concerned Citizen - Unlicensed Rental Property - Bed and Breakfast - SEP 25, 2017	No	NA	No

17-06450330	9/26/2017	5454 N NORDICA AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Condition of Property (i.e., dirty, poor condition, etc.),License Rules Violations (i.e., prohibited business list, owner does not live on premises),Other,Unlicensed Rental Property - Other,Unlicensed Rental Property - Single family home converted into multiple units - Not Applicable - Single family home converted into multiple units with one individual living on back porch area and basement converted into seperate apartment - SEP 24, 2017 - Single family home converted into multiple units with one individual living on back porch area and basement converted into seperate apartment. Requesting building inspectors	No	NA	No
17-06590193	10/2/2017	55 E WASHINGTON ST	Shared Housing / Vacation Rental Complaints	- Vacation Rentals and Travel - Credit Card - Advertisement Copy - The Fornelli Tower has 2 businesses operating without a vacation rental license or hotel license at 55 E Washington. Loop Suites (name of company) advertises on Booking.com, there is another company advestising on airbnb. This is been going on for 2 years but the city is allowing this go on without penalty	Yes	No	No
17-06725314	10/7/2017	1757 N HERMITAGE AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Other - Airbnb violated its host guarantee terms and conditions - Shared Housing (e.g., AIRBNB) - AUG 20, 2017 - [REDACTED]	Yes	No	No
17-06952211	10/16/2017	4868 N ROCKWELL ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.) - THERE IS AN OLD GAS METER ON THE SIDE OF THE BUILDING THAT BEEPS LOUDLY AND CONSTANTLY. (This was the closest complain category I could find, sorry.) - Not Applicable - OCT 15, 2017 - [REDACTED]	NA	NA	No
17-06973124	10/17/2017	7727 S COLFAX AVE	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - Condition of Property (i.e., dirty, poor condition, etc.) - Vacation Rental (e.g., VRBO) - OCT 05, 2017 - [REDACTED]	Yes	No	No
17-07010082	10/18/2017	777 N MICHIGAN AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises) - AirBnB Listing must be removed - Shared Housing (e.g., AIRBNB) - OCT 14, 2017	Yes	Yes	No
17-07176238	10/25/2017	2745 N HAMPDEN CT	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Unlicensed Rental Property,License Rules Violations (i.e., prohibited business list, owner does not live on premises),Excessive Noise (i.e., loud parties, foot traffic in & out, etc.) - Shared Housing (e.g., AIRBNB) - OCT 25, 2017	No	NA	No
17-07229656	10/27/2017	5100 S CORNELL AVE	Shared Housing / Vacation Rental Complaints	Guest Staying in Rental Property - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.) - Shared Housing (e.g., AIRBNB) - OCT 6, 2017	Yes	No	No
17-07299356	10/30/2017	2839 W WELLINGTON AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Unlicensed Rental Property - single family chopped up into multiple units - Not Applicable - OCT 25, 2017 - Don't Know	NA	NA	No
17-07381289	11/2/2017	5100 S CORNELL AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - NOV 02, 2017	Yes	No	No

17-07411208	11/3/2017	709 E 84TH ST	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Condition of Property (i.e., dirty, poor condition, etc.),License Rules Violations (i.e., prohibited business list, owner does not live on premises),Other,Unlicensed Rental Property - Health risk including rodents, bedbugs, no insuranse (building in co-op) - Shared Housing (e.g., AIRBNB) - SEP 30, 2017 - Don't Know	Yes	Yes	No
17-07458340	11/5/2017	111 W WACKER DR	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Shared Housing (e.g., AIRBNB) - NOV 05, 2017 - [REDACTED]	Yes	No	No
17-07458381	11/5/2017	111 W WACKER DR	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Shared Housing (e.g., AIRBNB) - NOV 05, 2017 - [REDACTED]	NA	NA	No
17-07532007	11/7/2017	2745 N HAMPDEN CT	Shared Housing / Vacation Rental Complaints	The owner of this condo is engaged in the business of short term rentals(airbnb) - Concerned Citizen - Other - Shared Housing (e.g., AIRBNB) - OCT 1, 2017	Yes	Yes	No
17-07983792	11/27/2017	3943 N RICHMOND ST	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Shared Housing (e.g., AIRBNB) - Don't Know - Unlicensed Rental Property - NOV 25, 2017	Yes	Yes	No
17-07987003	11/27/2017	915 S LYTLE ST	Shared Housing / Vacation Rental Complaints	Vacation Rentals and Travel - THE CALLER STATES THAT HE RENTED THIS PROPERTY FOR 1 WEEK. AND THE LIVING CONDITIONS WERE DEPLORABLE.. AND UNSANITARY.. THE CALLER WAS UNABLE TO STAY AT THIS RENTAL CONDO.. AND HAD TO FIND OTHER SLEEPING ARRANGEMENT AND PAY ADDITIONAL MONEY. THE RENTAL AGENCY REFUSES TO PROVIDE A FULL REFUND FOR THIS PROPERTY..FRUIT FLIES AND INSECTS.AND DIRTY LINEN. AND HORRIABLE SMELL.. NOT TOILET PAPER.. - NOV 24, 2017 - Credit Card - Receipt,Contract	Yes	No	No
17-08062676	11/30/2017	52 N MENARD AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Condition of Property (i.e., dirty, poor condition, etc.) - Vacant Lot, trash, broken fences hazard to neighbors - Not Applicable - NOV 30, 2017 - Don't Know - [REDACTED]	Yes	No	No
17-08180220	12/5/2017	2025 S INDIANA AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Vacation Rental (e.g., VRBO) - DEC 5, 2017 - Unlicensed Rental Property - unit owner is renting out property as air bnb and that goes against the condo association contract	Yes	Yes	No
17-08457833	12/18/2017	11909 S STATE ST	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - Other - air quality poor in bedroom, infested with flies, refused refund, and lied on, and kick out, no drinking water - Shared Housing (e.g., AIRBNB) - OCT 17, 2017	NA	NA	No

17-08495693	12/20/2017	240 E ILLINOIS ST	Shared Housing / Vacation Rental Complaints	Condo 2 bedroom, 3 bedrooms expansive north views from larger floor plan. Steps to michigan ave and the lake. Lic registration # MGP6423319. I am property owner airbnb is not permitted - Concerned Citizen - airbnb - ,Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - DEC 14, 2017	Yes	Yes	No
17-08651561	12/28/2017	140 N ASHLAND AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - ,Condition of Property (i.e., dirty, poor condition, etc.) - Bed Bugs - Not Applicable - OCT 20, 2017 - Don't Know	Yes	No	No
18-00014215	1/1/2018	6110 N WINTHROP AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Unlicensed Rental Property - Becovic Property Management is renting multiple units on Airbnb under multiple accounts to skirt licensing rules. Two units are in my building and they have many more in their other properties. - Not Applicable - DEC 25, 2017 - Don't Know	Yes	No	No
18-00036097	1/3/2018	6168 N RAVENSWOOD AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises) - This morning, we woke up to the unit spewing water all down our shared driveway, creating a sheet of ice all the way down to the sewer. - Not Applicable - JAN 03, 2018 - Don't Know - [REDACTED]	Yes	No	No
18-00037165	1/3/2018	52 N MENARD AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Condition of Property (i.e., dirty, poor condition, etc.) - vacant lot, broken pickets, debris, vacant cars, danger to neighboring connected building. dark, owner not maintaining lot. - Not Applicable - JAN 02, 2018 - Don't Know	NA	NA	No
18-00058306	1/4/2018	2258 W GRAND AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - OCT 05, 2017	Yes	Yes	No
18-00079423	1/5/2018	507 N OAKLEY BLVD	Shared Housing / Vacation Rental Complaints	Original BACP SR #18-00064193 - Residential - HOME - Illegal Airbnb - Tuesday - anytime - 312-659-1033. SEND AFFIDAVIT FOR POSSIBLE ILLEGAL AIRBNB. HERE IS THE AIRBNB LISTING: https://www.airbnb.com/rooms/7070958 - Vacation Rentals and Travel	Yes	No	No
18-00107555	1/7/2018	1426 N NORTH PARK AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.) - CALLER LIVES NEXT DOOR TO THIS AIR B AND B BUSINESS AND THE GUEST ARE THROWING UP BETWEEN HOUSES OWNER IS NOT CLEANING UP AFTER THE MESS - Not Applicable - DEC 23, 2017- CALLER STATES THE OWNER LIVES AT 1532 N LELAND- ON GOING PROBLEM AT THIS ADDRESS	No	NA	No
18-00215476	1/12/2018	1426 N NORTH PARK AVE	Shared Housing / Vacation Rental Complaints	Condition of Property (i.e., dirty, poor condition, etc.),Excessive Noise (i.e., loud parties, foot traffic in & out, etc.) - Concerned Citizen - Shared Housing (e.g., AIRBNB).. a lot of traffic in the neighborhood at 2am -4am - JAN 12, 2018 - Don't Know - NOV 4, 2017..social media parties	No	NA	No
18-00442528	1/23/2018	5409 S DREXEL AVE	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.) - Shared Housing (e.g., AIRBNB) - JAN 24, 2018	Yes	No	No

18-00522782	1/29/2018	448 N CARPENTER ST	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Unlicensed Rental Property - Bed and Breakfast - JAN 29, 2018	No	NA	No
18-00546259	1/31/2018	10101 S WINSTON AVE	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - ,Other - Shared Housing (e.g., AIRBNB) - JAN 26, 2018 - [REDACTED]	Yes	No	No
18-00561447	2/2/2018	2042 N WINCHESTER AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises),Unlicensed Rental Property - Resident (unit 2 East) not registered to operate an AIRBNB - Shared Housing (e.g., AIRBNB) - Don't Know - [REDACTED] - DEC 1, 2017	Yes	Yes	No
18-00708735	2/20/2018	6040 S LA SALLE ST	Shared Housing / Vacation Rental Complaints	I occupied 6040 S. LaSalle Shared Jan 15, 2018 through Jan 24, 2018. (Per identification ny owner, Mr. Michael Duckworth in an airbnb email dated Jan 18, 2018). While there, I observed certain conditions which i believe merrit an investigation by the city to ensure that the conditions therin do not pose a threat to the health, safety and welfare of its transiet occupants. - Guest Staying in Rental Property - Shared Housing (e.g., AIRBNB) - JAN 24, 2018 - Condition of Property (i.e., dirty, poor condition, etc.),Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),License Rules Violations (i.e., prohibited business list, owner does not live on premises),Other,Unlicensed Rental Property	Yes	Yes	Yes
18-00754766	2/24/2018	7251 S SOUTH SHORE DR	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - Condition of Property (i.e., dirty, poor condition, etc.) - bed bugs - Not Applicable - FEB 05, 2018 - [REDACTED]	Yes	No	No
18-00762314	2/26/2018	1515 W OAKDALE AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Condition of Property (i.e., dirty, poor condition, etc.),Excessive Noise (i.e., loud parties, foot traffic in & out, etc.) - The property is constantly littered with trash in the front. The rear garage door is rarely closed at night, and there is always trash spilling out of the cans. Constantly bags of trash and food and scrap in front of open garage door and inside. There is a very large rat problem and homeless individuals sleep inside the garage at night. - Not Applicable - FEB 26, 2018 - Don't Know	No	NA	No
18-00775773	2/27/2018	360 W HUBBARD ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Other - apartment placed on Airbnb - Shared Housing (e.g., AIRBNB) - FEB 26, 2018 - Don't Know	Yes	No	No
18-00777759	2/27/2018	852 N ELSTON AVE	Shared Housing / Vacation Rental Complaints	I purchased a 4 unit residential building on Jan, 2018. One of the tenants is renting her unit on AIRBNB which was permittted under the lease of former owner. - Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises),Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - FEB 1, 2018	Yes	Yes	Yes

18-00793007	2/28/2018	40 E 9TH ST	Shared Housing / Vacation Rental Complaints	Illegal airbnb unit 711. Burnham Plaza is on the prohibited building listing - Concerned Citizen - Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - JAN 1, 2018	Yes	Yes	Yes
18-00845184	3/6/2018	1726 N SEDGWICK ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.) - This property has been the site of rave parties with 60-100 people occupying a studio apartment appropriate for 1-3 people and traffic jams happening along Sedgwick at 2am with drive-by revelers, unruly bachelor parties with drunk revelers urinating from the rooftop onto our property, unruly other parties with attendees throwing apples at passers-by and on neighboring properties and rich-kid high school parties, an alternative site for the mom and dad are out of town so let's have a party? party. I'd be happy to tell you about the sex scene I saw from my home glancing at one of the windows of an apartment at 1726 last winter. It was quite extraordinary?if not vulgar. Who cares that we pay more than \$20,000 in property taxes?we're scheduled to pay \$31,000 by 2020!...On Jan 27/28, 2018 police arrived at 1:15 am, Jan 28/29 We hired an off duty police officer from 10pm to 6am to monitor activities of one day renters. On Feb 3/4, 2018 this 6 unit furnished flat has modified from short term rental property to one month leases....On Feb 20, 2017 19th district advised me that Joanne Jones Jeff Jones were not property licensed.On March 3, 2017 I organized neighbors within 500 feet to write letters to Samantha Fields. - Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),Unlicensed Rental Property - Vacation Rental (e.g., VRBO) - FEB 20, 2017	Yes	Yes	Yes
18-00845667	3/6/2018	4928 N LESTER AVE	Shared Housing / Vacation Rental Complaints	THE UNIT IS BEING USED AS A SHORT TERM RENTAL PROPERTY AND IS CURRENTLY LISTED ON WENSITE AIRBNB. PER THE CONDO ASSOCIATION'S GOVERNING DOCUMENTS , UNITS MAY NOT BE LEASED FOR HOTEL OR TRANSIET USE WHICH IS DEFINED AS AN INTIAL TERM. - Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises),Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - FEB 28, 2018	Yes	Yes	No
18-00861236	3/7/2018	22 W ONTARIO ST	Shared Housing / Vacation Rental Complaints	concern about possible vacation rental within her building - Concerned Citizen - Unlicensed Rental Property - Vacation Rental (e.g., VRBO)	Yes	Yes	Yes
18-00865908	3/8/2018	1108 E 82ND PL	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Other - bed bugs - Not Applicable - FEB 09, 2018	Yes	No	No
18-00872151	3/8/2018	1710 N MAPLEWOOD AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),License Rules Violations (i.e., prohibited business list, owner does not live on premises),Unlicensed Rental Property - Not Applicable - MAR 2, 2018 - [REDACTED] - owner only rents it out when he goes out of town	Yes	No	No

18-00909997	3/13/2018	1515 W OAKDALE AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Condition of Property (i.e., dirty, poor condition, etc.),Other - Trash everywhere out front and in area around garage. Garage door is never closed. Many many rats living around property. Trash cans always overflowing. - Shared Housing (e.g., AIRBNB) - MAR 12, 2018 - Don't Know	No	NA	No
18-00910312	3/13/2018	505 N LAKE SHORE DR	Shared Housing / Vacation Rental Complaints	ORIGINAL BACP SR #18-00837509 - Residential - HOME - Airbnb rental in a building on the Prohibited Building List: https://abnb.me/NbafxnyZK - Monday,Tuesday,Wednesday,Thursday,Friday,Saturday,Sunday - overnight - Vacation Rentals and Travel	Yes	Yes	No
18-00946359	3/16/2018	55 E WASHINGTON ST	Shared Housing / Vacation Rental Complaints	- Vacation Rentals and Travel - Downtown Suites is operating without a license, they change the name from Loop Suites to Downtown Suites - MAR 01, 2018 - The building owners, 55 E Development LLC aka Fornelli Tower, is allowing their tenant "downtown suites" formely know as "loop suites" to operate without a license, they have units on the floors, 13, 14, 15 and 16th	Yes	No	No
18-00954641	3/17/2018	448 N CARPENTER ST	Shared Housing / Vacation Rental Complaints	Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises),Unlicensed Rental Property - TOWN HOUSE HAS RENTAL ON WEBSITE FOR RENTING OUT - Bed and Breakfast - Don't Know - MAR 17, 2018	No	NA	No
18-00979663	3/20/2018	6250 S PARK SHORE EAST CT	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Other - 3 APARTMENTS ON MY MOTHER'S FLOOR HAVE BED BUGS--REQUESTING INSPECTION OF ALL APARTMENTS ON THAT FLOOR ASAP!!! - Not Applicable - MAR 20, 2018	NA	NA	No
18-00986106	3/20/2018	3753 W GEORGE ST	Shared Housing / Vacation Rental Complaints	- Other Scams - VRBO - Unauthorized VRBO/ vacation renting in this building - [REDACTED]	Yes	No	No
18-01039512	3/26/2018	11 W DIVISION ST	Shared Housing / Vacation Rental Complaints	The buikding is an apartment building. We don;t allow residents to rent their apartments. - Concerned Citizen - Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - MAR 23, 2018	Yes	Yes	No
18-01106175	4/2/2018	2527 W HARRISON ST	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),Other - In addition to the excessive noise, the host of the property is doing work in the place with excessive noise and dust. The host was doing even wood work inside the place, without ventilation, that has make me cough and headache. I did not take pictures at the time, but i tell my host that i would rather move. She did not accept my complaint and also is even making a party today. - Shared Housing (e.g., AIRBNB) - MAR 22, 2018 - [REDACTED]	Yes	Yes	No

18-01135281	4/5/2018	1726 N SEDGWICK ST	Shared Housing / Vacation Rental Complaints	I would like to report the rental un its at 1726 N. Sedgwick are being used as party houses. Crammingin party goersand having police routinely called out in old town, I believe that these airbnb rentalsare greatly contributing to the problem. - Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),License Rules Violations (i.e., prohibited business list, owner does not live on premises),Condition of Property (i.e., dirty, poor condition, etc.),Unlicensed Rental Property - Vacation Rental (e.g., VRBO) - JAN 1, 2018	Yes	Yes	Yes
18-01212621	4/13/2018	1726 N SEDGWICK ST	Shared Housing / Vacation Rental Complaints	On April 6 the gaarden level apartment at 1726 is te site of a loud overocuppied party with a steady flow of party going traffic from 11pm to 4:30am on Sat, April 7. - Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),Condition of Property (i.e., dirty, poor condition, etc.),Unlicensed Rental Property,License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Vacation Rental (e.g., VRBO) - APR 6, 2018	Yes	Yes	Yes
18-01309551	4/24/2018	3514 N SHEFFIELD AVE	Shared Housing / Vacation Rental Complaints	- Vacation Rentals and Travel - APR 19, 2018 - Credit Card - Receipt - 3 [REDACTED]	Yes	No	No
18-01338097	4/26/2018	5220 S KENWOOD AVE	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - Other - No heat - Vacation Rental (e.g., VRBO) - APR 25, 2018 - [REDACTED]	No	NA	No
18-01436601	5/7/2018	4331 N CENTRAL PARK AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Other - overcrowding, drug use - MAY 7, 2017 - Not Applicable	Yes	Yes	No
18-01436842	5/7/2018	4331 N CENTRAL PARK AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Shared Housing (e.g., AIRBNB) - License Rules Violations (i.e., prohibited business list, owner does not live on premises),Condition of Property (i.e., dirty, poor condition, etc.) - MAY 6, 2018	Yes	Yes	No
18-01448929	5/8/2018	1726 N SEDGWICK ST	Shared Housing / Vacation Rental Complaints	The private garage removal service that Joanne Jones hired-flood brothers missed 2 pickups. Photos attached. Garbage was not removed on March 22 or March 29 it was finnaly removed on April 5. - Concerned Citizen - Unlicensed Rental Property,Condition of Property (i.e., dirty, poor condition, etc.) - Vacation Rental (e.g., VRBO) - MAR 22, 2018	Yes	Yes	No
18-01461175	5/9/2018	6832 S CLYDE AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),Unlicensed Rental Property,Other,License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Illegal Air BnB	Yes	No	No
18-01463816	5/9/2018	939 W NORTH AVE	Shared Housing / Vacation Rental Complaints	- Vacation Rentals and Travel - Deceptive Marketing - MAY 09, 2018 - Credit Card - Advertisement Copy,Business Card,Receipt,Other - email correspondence - [REDACTED]	NA	NA	No
18-01485476	5/11/2018	849 N DEARBORN ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - MAY 01, 2018 - [REDACTED]	Yes	No	No

18-01485615	5/11/2018	849 N DEARBORN ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - MAY 01, 2018 - [REDACTED]	Yes	No	No
18-01508865	5/14/2018	852 N ELSTON AVE	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - Unlicensed Rental Property - Vacation Rental (e.g., VRBO) - MAY 10, 2018	Yes	No	No
18-01569069	5/20/2018	4019 N DAMEN AVE	Shared Housing / Vacation Rental Complaints	License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Concerned Citizen - Shared Housing (e.g., AIRBNB) - MAY 20, 2018 - THEY ARE FALSIFYING SIGNATURES AND SENDING OUT FLYERS.	Yes	No	No
18-01576144	5/21/2018	4045 N LAPORTE AVE	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - Other - I have contacted the building about bed bugs in my apartment and have not received any response - Not Applicable - MAY 19, 2018 - Don't Know	Yes	Yes	No
18-01602434	5/23/2018	150 W SUPERIOR ST	Shared Housing / Vacation Rental Complaints	The tenant is listing this property in violation of the condo association rules. The building is in the Prohibited list. - Concerned Citizen - Unlicensed Rental Property, License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Vacation Rental (e.g., VRBO) - APR 23, 2018	Yes	No	No
18-01609169	5/23/2018	720 S MICHIGAN AVE	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - Other - I am concerned about bed bugs - itchy and bites on my legs and back itchy - Not Applicable - MAY 21, 2016 - [REDACTED]	Yes	No	No
18-01663680	5/30/2018	11 W DIVISION ST	Shared Housing / Vacation Rental Complaints	The resident is illegally renting the apartment on Airbnb. - Concerned Citizen - Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - MAY 25, 2015	Yes	Yes	No
18-01665425	5/30/2018	5634 N WINTHROP AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Other - caller believes tenant renting out unit as Air B and B - Not Applicable - Don't Know - (Unit 1) - Caller wants to remain anonymous - [REDACTED] - MAY 30, 2018	No	NA	No
18-01672893	5/31/2018	2319 N HALSTED ST	Shared Housing / Vacation Rental Complaints	I am the owner of licensed b&b lic # 2398451. It has come to my attention that my business name has been co-opted by a listing on Booking.com - Concerned Citizen - Shared Housing (e.g., AIRBNB) - MAY 8, 2018 - Other - Someone listed my home	Yes	Yes	Yes
18-01680877	6/1/2018	6049 N TROY ST	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Unlicensed Rental Property, Condition of Property (i.e., dirty, poor condition, etc.) - Not Applicable - JUN 1, 2018	Yes	Yes	No
18-01682336	6/1/2018	2415 W BELLE PLAINE AVE	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - Other - Failure to refund a security deposit as promised - Shared Housing (e.g., AIRBNB) - MAY 14, 2017 - [REDACTED]	Yes	No	No

18-01684899	6/1/2018	11321 S HOMAN AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Unlicensed Rental Property,Excessive Noise (i.e., loud parties, foot traffic in & out, etc.) - Shared Housing (e.g., AIRBNB) - JUN 1, 2018	No	NA	No
18-01698085	6/3/2018	809 W BRADLEY PL	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),Unlicensed Rental Property,Other,License Rules Violations (i.e., prohibited business list, owner does not live on premises) - prohibited buildings list. Owner refuses to take down listing and owner doesn't live on premises. - Shared Housing (e.g., AIRBNB) - MAY 30, 2018 - Don't Know - [REDACTED]	Yes	Yes	No
18-01719086	6/5/2018	3039 W LEXINGTON ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Not Applicable - JUN 20, 2018 - Don't Know	No	NA	No
18-01759053	6/8/2018	53 W HURON ST	Shared Housing / Vacation Rental Complaints	Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Shared Housing (e.g., AIRBNB) - APR 9, 2018	Yes	No	No
18-01766434	6/9/2018	4333 N CENTRAL PARK AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Condition of Property (i.e., dirty, poor condition, etc.),Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),License Rules Violations (i.e., prohibited business list, owner does not live on premises),Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - JUN 9, 2018	Yes	No	No
18-01768842	6/10/2018	1450 N RIDGEWAY AVE	Shared Housing / Vacation Rental Complaints	Guest Staying in Rental Property - Condition of Property (i.e., dirty, poor condition, etc.) - VERY DIRTY AND CAT LOOKED STARVING - Shared Housing (e.g., AIRBNB) - JUN 9, 2018 - [REDACTED] --LADY OWNER WAS DRUNK VERY DRUNK ALL THE TIME	Yes	No	No
18-01823412	6/15/2018	849 N DEARBORN ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Condition of Property (i.e., dirty, poor condition, etc.),Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),Unlicensed Rental Property,Other,License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Not Applicable - JUN 20, 2018 - Don't Know	Yes	Yes	Yes
18-01833525	6/15/2018	5421 N EAST RIVER RD	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - ,Condition of Property (i.e., dirty, poor condition, etc.),License Rules Violations (i.e., prohibited business list, owner does not live on premises) - BED BUG INFESTATION - Not Applicable - JUN 01, 2018 - [REDACTED]	Yes	No	No
18-01917247	6/25/2018	6533 N KEDZIE AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Condition of Property (i.e., dirty, poor condition, etc.) - Not Applicable - JUN 23, 2018	Yes	No	No

18-01920021	6/25/2018	2845 N MAPLEWOOD AVE	Shared Housing / Vacation Rental Complaints	For the past year my neighbors have been airbnb his home because he no longer lives there. - Concerned Citizen - Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - MAY 23, 2018	Yes	Yes	Yes
18-01930949	6/26/2018	6119 N PAULINA ST	Shared Housing / Vacation Rental Complaints	ORIGINAL BACP SR #18-01755146 - Residential - HOME - bed and breakfast - Monday,Tuesday,Wednesday,Thursday,Friday,Saturday,Sunday. GARAGE CONVERTED INTO RENTAL SPACE. OWNER REPORTED TO LIVE IN MAIN HOUSE. RENTERS TAKE UP ALL THE PARKING. CONSTANT STREAM OF RENTERS. HAS VIDEOS. PLEASE MAIL 2 FORMS BY USPS & ALSO SEND BY EMAIL. CW DOES NOT HAVE PRINTER. lupisimi13@yahoo.com - Vacation Rentals and Travel	Yes	No	No
18-01936224	6/26/2018	3935 W 64TH PL	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - Condition of Property (i.e., dirty, poor condition, etc.),Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - JUN 01, 2018	Yes	No	No
18-01972211	6/30/2018	7536 W DEVON AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Unlicensed Rental Property - Possible B&B Rental, Caller seeing an influx of traffic - Shared Housing (e.g., AIRBNB) - JUN 30, 2018 - Don't Know	No	NA	No
18-01987746	7/2/2018	849 N DEARBORN ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - JUL 01, 2018	NA	NA	No
18-01997443	7/3/2018	1017 W WASHINGTON BLVD	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - ,License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Neighbor in unit. See people in and out weekly who do not live in in specific unit 6F for a year now - Shared Housing (e.g., AIRBNB) - MAY 01, 2017	No	NA	No
18-02019657	7/6/2018	46 E CHICAGO AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises) - This building is on prohibited list for AirBnb - Shared Housing (e.g., AIRBNB) - JUL 05, 2018	Yes	No	No
18-02021455	7/6/2018	1241 W NORTH SHORE AVE	Shared Housing / Vacation Rental Complaints	- Vacation Rentals and Travel - JUL 06, 2018 - Credit Card - Other - Online AirBnB reservation; text-messages and voicemail with host - [REDACTED]	Yes	No	No
18-02034696	7/8/2018	540 N STATE ST	Shared Housing / Vacation Rental Complaints	- Vacation Rentals and Travel - MAY 10, 2018 - Cash - Other - Email communications	Yes	Yes	Yes

18-02067148	7/11/2018	1342 W RANDOLPH SD	Shared Housing / Vacation Rental Complaints	Guest Staying in Rental Property - Condition of Property (i.e., dirty, poor condition, etc.), Excessive Noise (i.e., loud parties, foot traffic in & out, etc.), License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Not Applicable - Not Applicable - JUN 21, 2018 - JUN 10, 2018/caller reports that she moved into this building may 26th 2018/complainant says that she was not informed that the building was rented as a bed and breakfast/caller would like to check to see if the owner is licensed to have a bed and breakfast. - [REDACTED]	Yes	Yes	No
18-02071834	7/12/2018	1423 N ASHLAND AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Vacation Rental (e.g., VRBO) - JUL 01, 2018	Yes	Yes	No
18-02081163	7/12/2018	1440 S WABASH AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Our building is on the no airbnb list and owner listed it anyway, also prohibited per our HOA rules. https://www.airbnb.com/rooms/25764807?location=chicago&check_in=2018-07-24&check_out=2018-07-25&s=0-db1a22 - Not Applicable - JUL 12, 2018 - [REDACTED]	Yes	Yes	No
18-02124394	7/17/2018	1820 N SHEFFIELD AVE	Shared Housing / Vacation Rental Complaints	ORIGINAL BACP SR #18-02091332 - Operating illegal air b&b - Residential - HOME - Illegal air b&b - Concerned Citizen - Unlicensed Rental Property - Not Applicable - JUL 13, 2018 - Don't Know	Yes	No	No
18-02124450	7/17/2018	1814 N SHEFFIELD AVE	Shared Housing / Vacation Rental Complaints	ORIGINAL BACP SR #18-02091364 - Operating illegal air b&b - Residential - HOME - Illegal air b&b - Concerned Citizen - Unlicensed Rental Property - Not Applicable - JUL 17, 2018 - Don't Know	NA	NA	No
18-02163822	7/21/2018	540 N STATE ST	Shared Housing / Vacation Rental Complaints	- Apartment Rental - Through VRBO/HomeAway - JUL 11, 2018 - Credit Card - Contract	Yes	Yes	Yes
18-02180909	7/23/2018	442 E OAKWOOD BLVD	Shared Housing / Vacation Rental Complaints	Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises) - caller said that the owner is suppose 245 days out the year and the she doesn't live there at all, and she also has 11 bedrooms and only suppose to have 6 - Vacation Rental (e.g., VRBO) - JUL 22, 2018	Yes	No	No
18-02296328	8/3/2018	2349 N ELSTON CT	Shared Housing / Vacation Rental Complaints	Shared Housing (e.g., AIRBNB) - Concerned Citizen - Unlicensed Rental Property - SHORT TERM RENTALS IN UNIT 3..LEASE UNIT TO A COMPANY... - AUG 3, 2018 - [REDACTED]	NA	NA	No

18-02317721	8/6/2018	6323 W GRACE ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - ,Other,License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Not Applicable - AUG 06, 2018	Yes	No	No
18-02322128	8/7/2018	2370 N ELSTON AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises) - I am an Owner in the building. The Owner above me has rented his property to a company that AirBnB's full time. This is strictly prohibited per our building declarations and bylaws. I have plenty of proof. - Shared Housing (e.g., AIRBNB) - AUG 01, 2018 - [REDACTED]	NA	NA	No
18-02387933	8/14/2018	555 W KINZIE ST	Shared Housing / Vacation Rental Complaints	The multiple properties that Zencity operates are downtown highrises (540 N. State). - Concerned Citizen - Shared Housing (e.g., AIRBNB) - AUG 9, 2018 - Unlicensed Rental Property	Yes	Yes	No
18-02388259	8/14/2018	320 W ILLINOIS ST	Shared Housing / Vacation Rental Complaints	This home is in high rise building in river north they do short term rentals - Concerned Citizen - Unlicensed Rental Property,License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Shared Housing (e.g., AIRBNB) - JUN 25, 2018	Yes	Yes	No
18-02389083	8/14/2018	6040 S LA SALLE ST	Shared Housing / Vacation Rental Complaints	The property was not found as described airbnb listing. - Concerned Citizen - Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - AUG 2, 2018	Yes	Yes	Yes
18-02389949	8/14/2018	824 W SUPERIOR ST	Shared Housing / Vacation Rental Complaints	I am currently an owner in a 3 unit building. The thirsd unit is currently being used short tern rental . - Concerned Citizen - Unlicensed Rental Property,License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Shared Housing (e.g., AIRBNB) - AUG 8, 2018	Yes	Yes	No
18-02397598	8/15/2018	403 W EUGENIE ST	Shared Housing / Vacation Rental Complaints	This address is always advertised as containing vacation units VBRO - Concerned Citizen - Unlicensed Rental Property,License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Shared Housing (e.g., AIRBNB) - JUL 13, 2018	Yes	Yes	No
18-02397934	8/15/2018	407 W EUGENIE ST	Shared Housing / Vacation Rental Complaints	This property is advertised in 4 diffrent sites(405-407 W. EUGENIE) - Concerned Citizen - Unlicensed Rental Property - Vacation Rental (e.g., VRBO) - JUL 13, 2018	Yes	Yes	No
18-02439446	8/20/2018	2712 N ASHLAND AVE	Shared Housing / Vacation Rental Complaints	Owner continues to rent as airbnb despite property being listed on prohibited list. - Concerned Citizen - Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - AUG 20, 2018	Yes	Yes	No

18-02453527	8/21/2018	5534 N KENMORE AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Unlicensed Rental Property,Other,License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Elevator has not met any code requirements since 2015 - Shared Housing (e.g., AIRBNB) - AUG 20, 2018	Yes	Yes	No
18-02490253	8/25/2018	2712 N ASHLAND AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Shared Housing (e.g., AIRBNB) - AUG 25, 2018 - [REDACTED]	Yes	No	No
18-02511609	8/28/2018	1348 N ARTESIAN AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Unlicensed Rental Property - tenant renting out space in building they do not own for over a year without proper authority, license and likely without insurance - Shared Housing (e.g., AIRBNB) - AUG 03, 2018	No	NA	No
18-02539519	8/31/2018	225 S LEAVITT ST	Shared Housing / Vacation Rental Complaints	Guest Staying in Rental Property - Condition of Property (i.e., dirty, poor condition, etc.),License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Shared Housing (e.g., AIRBNB) - OCT 21, 2017-- after canceling the lease with airbnb owners cancel her lease and gave her 2 hours to leave the premises with no regards.	Yes	Yes	No
18-02645533	9/12/2018	2512 N ST LOUIS AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Shared Housing (e.g., AIRBNB) - Don't Know / - SEP 11, 2018 Too many units listed, 3, for a single family home. Parking issues.	Yes	Yes	No
18-02673185	9/14/2018	1936 W SUPERIOR ST	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - SEP 14, 2018	No	NA	No
18-02726766	9/20/2018	2526 W WINONA ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - ,Condition of Property (i.e., dirty, poor condition, etc.),Other,License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Renting units and rehabbing property with known unresolved building violations. Also lots of trash in back yard for months. - Shared Housing (e.g., AIRBNB) - AUG 15, 2018	No	NA	No
18-02751270	9/24/2018	1504 W AUGUSTA BLVD	Shared Housing / Vacation Rental Complaints	[3rd floor unit] Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),Unlicensed Rental Property - neighbor is concerned that this unit is listed okay for 10 persons to occupy- noise and too many persons is the problem, this is self check-in /I does not meet guests - Shared Housing (e.g., AIRBNB) - SEP 23, 2018, this is an ongoing problem caller thinks that there should be an ord- for these problems which happen any day-any time of day - [REDACTED] - Don't Know -[please contact caller, he would like a call back]	Yes	Yes	No

18-02783033	9/27/2018	5325 W BELLE PLAINE AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises),Unlicensed Rental Property - OWNER IS MISSING FOR WKS - STRANGE PEOPLE WITH LUGGAGE GOING INTO HOUSE & SMOKING IN BACK YARD - Shared Housing (e.g., AIRBNB) - SEP 24, 2018 -	No	NA	No
18-02811038	10/1/2018	5847 N OCONTO AVE	Shared Housing / Vacation Rental Complaints	Illegally renovated house, now 6 bedrooms that include 3 in a basement with 1 exit. - Concerned Citizen - Unlicensed Rental Property,Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Shared Housing (e.g., AIRBNB) - SEP 22, 2018	Yes	Yes	Yes
18-02828961	10/3/2018	1918 S MICHIGAN AVE	Shared Housing / Vacation Rental Complaints	The owner is renting the unit without approval of the City of Chicago. - Concerned Citizen - AUG 31, 2018 - Unlicensed Rental Property - Shared Housing (e.g., AIRBNB)	Yes	Yes	Yes
18-02829231	10/3/2018	5847 N OCONTO AVE	Shared Housing / Vacation Rental Complaints	Loud noise parties all night, too many people at one time. - Concerned Citizen - Unlicensed Rental Property,Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Shared Housing (e.g., AIRBNB) - OCT 1, 2018	Yes	Yes	Yes
18-02830871	10/3/2018	5847 N OCONTO AVE	Shared Housing / Vacation Rental Complaints	Illegal airbnb started mid 2017. Tentants who rented house partied all night, beer bottles,used condoms and vomit up and down the block. - Concerned Citizen - Unlicensed Rental Property,Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),License Rules Violations (i.e., prohibited business list, owner does not live on premises),Condition of Property (i.e., dirty, poor condition, etc.) - Shared Housing (e.g., AIRBNB) - JUN 1, 2017	Yes	Yes	Yes
18-02907223	10/12/2018	871 N RICHMOND ST	Shared Housing / Vacation Rental Complaints	Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises),Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - SEP 12, 2018 - [REDACTED]	Yes	Yes	No
18-02950984	10/18/2018	411 W BELDEN AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Unlicensed Rental Property - MORE THAN ONE RENTAL UNIT IN THE BUILDING - Vacation Rental (e.g., VRBO) - OCT 18, 2018	Yes	No	No
18-02985024	10/23/2018	1257 N MILWAUKEE AVE	Shared Housing / Vacation Rental Complaints	This airbnb which shares a wall with our apartment has blasted music. - Concerned Citizen - Condition of Property (i.e., dirty, poor condition, etc.),Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),License Rules Violations (i.e., prohibited business list, owner does not live on premises),Unlicensed Rental Property - SEP 28, 2018 - Shared Housing (e.g., AIRBNB)	Yes	Yes	No

18-02988816	10/23/2018	2544 W MOFFAT ST	Shared Housing / Vacation Rental Complaints	Single family homebeing rented during weekends, parties, loud music. - Concerned Citizen - Condition of Property (i.e., dirty, poor condition, etc.),Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - OCT 9, 2018	Yes	Yes	No
18-02997342	10/24/2018	2537 N CENTRAL PARK AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.) - Shared Housing (e.g., AIRBNB) - JUN 1, 2018 - Don't Know	No	NA	No
18-03008216	10/25/2018	916 W FULLERTON AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Shared Housing (e.g., AIRBNB) - OCT 01, 2018 - [REDACTED]	Yes	No	No
18-03013743	10/26/2018	422 W ROSLYN PL	Shared Housing / Vacation Rental Complaints	Guest Staying in Rental Property - Condition of Property (i.e., dirty, poor condition, etc.) - Shared Housing (e.g., AIRBNB) - OCT 21, 2018 - [REDACTED] caller states that 1 bedroom cond in the bedroom there is a door that leads outside to the court yard when you open the door there is no platform there. Also there is a 2 inch drop at the front door	Yes	Yes	No
18-03018800	10/26/2018	1929 N BISSELL ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Unlicensed Rental Property - Vacation Rental (e.g., VRBO) - OCT 02, 2018 - Don't Know	No	NA	No
18-03021344	10/27/2018	243 E ONTARIO ST	Shared Housing / Vacation Rental Complaints	- Vacation Rentals and Travel - ,Credit Card - ,Other - Emails, online bank statements	Yes	No	No
18-03031420	10/29/2018	1455 W HIGHLAND AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - ,Condition of Property (i.e., dirty, poor condition, etc.),Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),Unlicensed Rental Property,Other - Noise. Traffic. Trash. Building code violations . Trash in yard. Not properly registered. - Shared Housing (e.g., AIRBNB) - OCT 18, 2018 - Don't Know	Yes	Yes	No
18-03034539	10/29/2018	1464 W CARMEN AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - OCT 26, 2018	NA	NA	No
18-03034668	10/29/2018	1464 W CARMEN AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.) - Shared Housing (e.g., AIRBNB) - OCT 25, 2018	Yes	Yes	No
18-03140729	11/12/2018	2850 N SHERIDAN RD	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - Other - Bed Bug Infestation- Landlord paid for one round of treatment which was ineffective at exterminating the problem. - Not Applicable - OCT 20, 2018 [REDACTED]	NA	NA	No

18-03160350	11/14/2018	151 E WACKER DR	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - Condition of Property (i.e., dirty, poor condition, etc.) - severe bed bug bites when loding in west tower room 1529 - Bed and Breakfast - NOV 09, 2018 - [REDACTED]	Yes	No	No
18-03170083	11/16/2018	521 N RUSH ST	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - Condition of Property (i.e., dirty, poor condition, etc.) - Bed and Breakfast - NOV 07, 2018 - [REDACTED]	NA	NA	No
18-03231282	11/26/2018	2480 N ORCHARD ST	Shared Housing / Vacation Rental Complaints	4 unit building reports an illegal Airbnb on the first floor with loud parties and clients, please investigate as they do not currently have a license - Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.), Unlicensed Rental Property, Other - the unit leasee is an absentee sublet - Not Applicable - Don't Know - NOV 22, 2018	Yes	Yes	Yes
18-03232357	11/27/2018	616 W ARLINGTON PL	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Condition of Property (i.e., dirty, poor condition, etc.), Excessive Noise (i.e., loud parties, foot traffic in & out, etc.), Unlicensed Rental Property, Other, License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Not Applicable - NOV 23, 2018 - [REDACTED]	Yes	No	No
18-03235254	11/27/2018	5938 S SAWYER AVE	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.) - Shared Housing (e.g., AIRBNB) - NOV 26, 2018	No	NA	No
18-03246950	11/28/2018	2480 N ORCHARD ST	Shared Housing / Vacation Rental Complaints	Tenant running airbnb illegally from location - Concerned Citizen - Unlicensed Rental Property, Excessive Noise (i.e., loud parties, foot traffic in & out, etc.), Condition of Property (i.e., dirty, poor condition, etc.), License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Shared Housing (e.g., AIRBNB) - NOV 27, 2018	NA	NA	No
18-03247065	11/28/2018	2427 N CLYBOURN AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Unlicensed Rental Property - Bed and Breakfast - Shared Housing (e.g., AIRBNB) - NOV 28, 2018 - Don't Know - [REDACTED]	Yes	Yes	No
18-03247078	11/28/2018	2429 N CLYBOURN AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Shared Housing (e.g., AIRBNB) - Bed and Breakfast - Don't Know	Yes	Yes	Yes

18-03252415	11/29/2018	5957 S ELIZABETH ST	Shared Housing / Vacation Rental Complaints	- Guest Staying in Rental Property - ,Condition of Property (i.e., dirty, poor condition, etc.),Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),Unlicensed Rental Property,License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Shared Housing (e.g., AIRBNB) - NOV 01, 2018 - Text	Yes	No	No
18-03252722	11/29/2018	1936 W SUPERIOR ST	Shared Housing / Vacation Rental Complaints	Eli does not live onsite in this 3 flat w/coach house in back, 4 units total. Coach house invites up to 8 people , but always has 20-40 on weekends. - Concerned Citizen - Condition of Property (i.e., dirty, poor condition, etc.),Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Shared Housing (e.g., AIRBNB) - NOV 1, 2018	Yes	Yes	No
18-03261063	11/30/2018	423 W ROSLYN PL	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Condition of Property (i.e., dirty, poor condition, etc.),License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Shared Housing (e.g., AIRBNB) - Don't Know - NOV 30, 2018	No	NA	No
18-03287752	12/4/2018	1814 N SHEFFIELD AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Vacation Rental (e.g., VRBO) - NOV 4, 2018	Yes	No	No
18-03303692	12/6/2018	2429 N CLYBOURN AVE	Shared Housing / Vacation Rental Complaints	ORIGINAL BACP SR #18-03240588 - Residential - HOME - AirBnb - Thursday,Friday,Saturday,Sunday - 8 pm - Concerned Citizen - Unlicensed Rental Property - Not Applicable - DEC 5, 2018 - Don't Know	Yes	Yes	Yes
18-03324537	12/10/2018	720 W EVERGREEN AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises),Unlicensed Rental Property - Not Applicable - DEC 10, 2018	No	NA	No
SR18-00232301	12/25/2018	3905 W 107TH ST 60655	Shared Housing/Vacation Rental Complaint	2018-12-15-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);License Rules Violations (i.e., prohibited business list, owner does not live on premises);Unlicensed Rental Property-Concerned Citizen	No	NA	No
SR18-00240308	1/2/2019	10341 S SANGAMON ST 60643	Shared Housing/Vacation Rental Complaint		Yes	Yes	No
SR19-00011592	1/3/2019	2620 N RACINE AVE 60614	Shared Housing/Vacation Rental Complaint	2019-01-02-Property owner rehabbed all units for Air BnB-Unlicensed Rental Property-Concerned Citizen	NA	NA	No
SR19-00069126	1/15/2019	720 W EVERGREEN AVE 60610	Shared Housing/Vacation Rental Complaint	2018-12-19-Unlicensed Rental Property-Concerned Citizen	Yes	Yes	No
SR19-00075577	1/16/2019	3905 W 107TH ST 60655	Shared Housing/Vacation Rental Complaint	2019-01-02-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.)-Concerned Citizen	No	NA	No

SR19-00076118	1/16/2019	1545 S STATE ST 60605	Shared Housing/Vacation Rental Complaint	2019-01-11-RENTING OUT MORE UNITS THAN LICENSE FOR AND GUEST SMOKING MARIJUANA AND MAKING LOUD NOISES IN HALLWAY-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);License Rules Violations (i.e., prohibited business list, owner does not liv	Yes	No	No
SR19-00080081	1/17/2019	30 E HURON ST 60611	Shared Housing/Vacation Rental Complaint	2018-12-19-I am the owner of 30 East Huron Unit 1005. I keep receiving notices to remove my proprty from home sharing platforms. However, I dont have any active listing and have not for quite some time. I have even contacted hosting platforms to confirm.	NA	NA	No
SR19-00105717	1/23/2019	3329 N KENMORE AVE 60657	Shared Housing/Vacation Rental Complaint	2019-01-15-Noise complaints and entire building is being marketed as a multi-unit AirBnB property. Link: https://www.loopnet.com/Listing/3329-N-Kenmore-Ave-Chicago-IL/14311096/ -License Rules Violations (i.e., prohibited business list, owner does not live	Yes	Yes	No
SR19-00143562	1/31/2019	916 W FULLERTON AVE 60614	Shared Housing/Vacation Rental Complaint	2018-11-20-Unlicensed Rental Property-Concerned Citizen	Yes	Yes	No
SR19-00143660	1/31/2019	916 W FULLERTON AVE 60614	Shared Housing/Vacation Rental Complaint	2019-01-01-Unlicensed Rental Property-Concerned Citizen	Yes	Yes	Yes
SR19-00962597	2/5/2019	870 N FRANKLIN ST 60610	Shared Housing/Vacation Rental Complaint	2019-01-05-Unlicensed Rental Property-Concerned Citizen	Yes	Yes	No
SR19-01006382	2/13/2019	11401 S Carpenter AVE 60643	Shared Housing/Vacation Rental Complaint	2019-02-05-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);Unlicensed Rental Property-Concerned Citizen	Yes	Yes	Yes
SR19-01023671	2/16/2019	5957 S ELIZABETH ST 60636	Shared Housing/Vacation Rental Complaint	2018-11-02-Landlord taking rent money not fixing major problems we have roaches rats tub feels like it's caving in and working Windows Windows too big to small roof leaking near light fixture missing locks off doors-Condition of Property (i.e., dirty, poo	Yes	Yes	No
SR19-01037456	2/19/2019	2036 S MICHIGAN AVE 60616	Shared Housing/Vacation Rental Complaint	2019-01-22-They have more than 6 units in their buildings-2036 S. Michigan and 630 W. Lake. They try to hide because they go by Cloud9 on airbnb.-Unlicensed Rental Property-Concerned Citizen	Yes	Yes	No
SR19-01042568	2/20/2019	1414 E 48TH ST 60615	Shared Housing/Vacation Rental Complaint	2019-01-23-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);Unlicensed Rental Property-Concerned Citizen	Yes	Yes	No
SR19-01042644	2/20/2019	1420 E 48TH ST 60615	Shared Housing/Vacation Rental Complaint	2019-01-23-License Rules Violations (i.e., prohibited business list, owner does not live on premises);Unlicensed Rental Property-Concerned Citizen	Yes	Yes	Yes
SR19-01045661	2/20/2019	6646 S KNOX AVE 60629	Shared Housing/Vacation Rental Complaint	2019-02-21-Unlicensed Rental Property-Concerned Citizen	Yes	Yes	No
SR19-01051172	2/21/2019	1924 N SAWYER AVE 60647	Shared Housing/Vacation Rental Complaint	2019-02-10-Unlicensed Rental Property-Concerned Citizen	No	NA	No
SR19-01051222	2/21/2019	1924 N SAWYER AVE 60647	Shared Housing/Vacation Rental Complaint	2019-02-17-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);Unlicensed Rental Property-Concerned Citizen	No	NA	No

SR19-01102716	3/4/2019	4746 S DREXEL BLVD 60615	Shared Housing/Vacation Rental Complaint	2019-03-04-Loud music and screams-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.)-Concerned Citizen	No	NA	No
SR19-01159460	3/14/2019	2712 N ASHLAND AVE 60614	Shared Housing/Vacation Rental Complaint	2019-03-14-The unit at 2712 N Ashland #3 continues to be listed on airbnb and is being actively rented today (3/14/19) through Saturday (3/16/19). This building has been on the House Sharing Prohibited list since 8/4/2018.- License Rules Violations (i.e.,	Yes	Yes	Yes
SR19-01167668	3/15/2019	6040 S LA SALLE ST 60621	Shared Housing/Vacation Rental Complaint	2019-03-14-SMOKES MARIJUANA - UNKEMPT GUESTS, URINATING ON THE OUTSIDE OF THE BUILDING-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.)-Concerned Citizen	No	NA	No
SR19-01179299	3/18/2019	2458 N CLYBOURN AVE 60614	Shared Housing/Vacation Rental Complaint	2019-03-18-Unlicensed Rental Property-Concerned Citizen	No	NA	No
SR19-01179617	3/18/2019	55 W ERIE ST 60654	Shared Housing/Vacation Rental Complaint	2019-03-16-Our building prohibits Airbnb. An owner has listed despite being prohibited-License Rules Violations (i.e., prohibited business list, owner does not live on premises);Unlicensed Rental Property;Other-Concerned Citizen	Yes	Yes	Yes
SR19-01194969	3/20/2019	57 W ERIE ST	Shared Housing/Vacation Rental Complaint	08:30-License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	No	NA	No
SR19-01194971	3/20/2019	57 W ERIE ST	Shared Housing/Vacation Rental Complaint	18:06-License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	No	NA	No
SR19-01194973	3/20/2019	57 W ERIE ST	Shared Housing/Vacation Rental Complaint	17:07-License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	No	NA	No
SR19-01195001	3/20/2019	55 W ERIE ST 60654	Shared Housing/Vacation Rental Complaint	2019-03-20-Our building is on the prohibited building list for vacation rentals. The owner of 2W is renting it as an Airbnb. This is not ok.-License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	NA	NA	No
SR19-01206854	3/22/2019	55 W ERIE ST 60654	Shared Housing/Vacation Rental Complaint	2019-03-22-License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	NA	NA	No
SR19-01211550	3/24/2019	3115 N SEMINARY AVE 60657	Shared Housing/Vacation Rental Complaint	2019-03-23-Several parties going past 2am. Trash left surrounding properties.- Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	Yes	No	No
SR19-01218053	3/25/2019	885 W LILL AVE 60614	Shared Housing/Vacation Rental Complaint	2019-03-25-Unlicensed Rental Property-Concerned Citizen	No	NA	No
SR19-01222176	3/26/2019	55 W Erie ST 6065	Shared Housing/Vacation Rental Complaint	Unlicensed Rental Property-Concerned Citizen	Yes	No	No
SR19-01225343	3/26/2019	558 W WEBSTER AVE 60614	Shared Housing/Vacation Rental Complaint	2018-06-19-Unlicensed Rental Property-Concerned Citizen	Yes	Yes	Yes

SR19-01243127	3/29/2019	55 W ERIE ST 60654	Shared Housing/Vacation Rental Complaint	2019-03-23-Our building is on prohibited blog list. Two units are operating out of here-License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	NA	NA	No
SR19-01243178	3/29/2019	55 W ERIE ST 60654	Shared Housing/Vacation Rental Complaint	2019-03-29-We have two units in our small building that have started to rent their places on Airbnb. We are on the prohibited buildings list. Please help us. Here is one listing: https://bit.ly/2JLS8Cm and here is the other: https://bit.ly/2WqUXKG Thank	NA	NA	No
SR19-01253457	4/1/2019	55 W ERIE ST 60654	Shared Housing/Vacation Rental Complaint	2019-03-31-License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	Yes	Yes	No
SR19-01256619	4/1/2019	55 W ERIE ST 60654	Shared Housing/Vacation Rental Complaint	2019-04-01-We have two units in our small building that have started to rent their places on Airbnb. We are on the prohibited buildings list. Please help us. Here is one listing: https://bit.ly/2JLS8Cm -License Rules Violations (i.e., prohibited business l	NA	NA	No
SR19-01265013	4/3/2019	55 W ERIE ST2W 60654	Shared Housing/Vacation Rental Complaint	2019-04-03-License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	Yes	Yes	Yes
SR19-01302790	4/10/2019	1530 N ELK GROVE AVEL 60622	Shared Housing/Vacation Rental Complaint	2019-03-15-Place had water and heat broken over winter. Fireman broke door open. Door remains open and resident appears to no longer live there. Fireman mentioned its a hoarder house. Unsure what to do as the former resident doesn't seem to mind its delap	Yes	No	No
SR19-01310828	4/11/2019	1726 N SEDGWICK ST 60614	Shared Housing/Vacation Rental Complaint	2019-04-07-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	Yes	Yes	Yes
SR19-01320173	4/12/2019	3806 S INDIANA AVE 60653	Shared Housing/Vacation Rental Complaint	2019-03-26-License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	Yes	Yes	Yes
SR19-01320788	4/12/2019	4560 S MICHIGAN AVE 60653	Shared Housing/Vacation Rental Complaint	2019-03-18-License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	Yes	Yes	Yes
SR19-01320863	4/12/2019	435 E OAKWOOD BLVD 60653	Shared Housing/Vacation Rental Complaint	2019-03-17-License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	Yes	Yes	Yes
SR19-01330238	4/15/2019	1216 W NEWPORT AVE 60657	Shared Housing/Vacation Rental Complaint	2019-03-15-Unlicensed Rental Property-Concerned Citizen	Yes	Yes	No
SR19-01346815	4/17/2019	5820 W GUNNISON ST 60630	Shared Housing/Vacation Rental Complaint	2019-04-13-Unlicensed Rental Property-Concerned Citizen	Yes	No	No
SR19-01366391	4/22/2019	628 W SCHUBERT AVE 60614	Shared Housing/Vacation Rental Complaint	2019-03-23-Unlicensed Rental Property-Concerned Citizen	Yes	Yes	No
SR19-01372752	4/23/2019	734 W 117TH ST 60628	Shared Housing/Vacation Rental Complaint	2019-04-15-Condition of Property (i.e., dirty, poor condition, etc.);Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);License Rules Violations (i.e., prohibited business list, owner does not l...-Concerned Citizen	Yes	No	No

SR19-01377880	4/24/2019	1430 W BERWYN AVE 60640	Shared Housing/Vacation Rental Complaint	2019-04-11-Unlicensed Rental Property-Concerned Citizen	Yes	Yes	No
SR19-01380487	5/17/2019	333 N DEARBORN STRoom 614 60654	Shared Housing/Vacation Rental Complaint		NA	NA	No
SR19-01381441	4/24/2019	435 E OAKWOOD BLVD 60653	Shared Housing/Vacation Rental Complaint	2019-03-26-License Rules Violations (i.e., prohibited business list, owner does not live on premises);Unlicensed Rental Property-Concerned Citizen	Yes	Yes	No
SR19-01399036	4/28/2019	1140 W NEWPORT AVE 60657	Shared Housing/Vacation Rental Complaint	2019-04-25-A BUNCH OF DOG FECES AND DEBRIS BEHIND THIS ILLEGAL AIR B N B PROPERTY-Unlicensed Rental Property-Concerned Citizen	Yes	No	Yes
SR19-01399089	4/28/2019	2140 N LINCOLN AVE 60614	Shared Housing/Vacation Rental Complaint	2019-04-27-CALLER RENTING ROOMS INSIDE HIS CONDO UNIT 5104-Unlicensed Rental Property-Concerned Citizen	No	NA	No
SR19-01428289	5/3/2019	2908 S PARNELL AVE 60616	Shared Housing/Vacation Rental Complaint	2019-04-16-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.)-Concerned Citizen	Yes	Yes	No
SR19-01470648	5/10/2019	55 W ERIE ST 60654	Shared Housing/Vacation Rental Complaint	2019-05-09-License Rules Violations (i.e., prohibited business list, owner does not live on premises);Unlicensed Rental Property;Excessive Noise (i.e., loud parties, foot traffic in & out, etc.)-Concerned Citizen	NA	NA	No
SR19-01477173	5/13/2019	943 W 33RD PLBasement 60608	Shared Housing/Vacation Rental Complaint	2019-05-13-The three children are living in very cramped living conditions with 2 adults. There are many safety concerns because not all children have their own beds. The two older children are very noisy. There is a baby that cries all day long is appear	NA	NA	No
SR19-01477185	5/13/2019	943 W 33RD PLGarden/Basement 60608	Shared Housing/Vacation Rental Complaint	2019-05-13-Concerns about whether three foster children ages 1, 11, and 12 are allowed to be living in a cramped garden apartment. The kids are very loud and the square footage is too small.-Condition of Property (i.e., dirty, poor condition, etc.);Excess	NA	NA	No
SR19-01484573	5/14/2019	55 W ERIE STUnit 1W 60654	Shared Housing/Vacation Rental Complaint	2019-05-13-License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	NA	NA	No
SR19-01484595	5/14/2019	55 W ERIE ST 60654	Shared Housing/Vacation Rental Complaint	2019-05-11-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.)-Concerned Citizen	NA	NA	No
SR19-01485106	5/14/2019	55 W ERIE ST2W 60654	Shared Housing/Vacation Rental Complaint	2019-05-14-License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	NA	NA	No
SR19-01485252	5/14/2019	55 W ERIE STUnit 2W 60654	Shared Housing/Vacation Rental Complaint	2019-05-14-Woken up at 12 and 2 pm with excessive noise-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	NA	NA	No

SR19-01489085	5/14/2019	2511 N SAINT LOUIS AVE 60647	Shared Housing/Vacation Rental Complaint	2019-05-13-FLIMING CREW -PARKING EVERY NIGHT MONDAY -SUNDAY 11PM-Condition of Property (i.e., dirty, poor condition, etc.);Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);License Rules Violations (i.e., prohibited business list, owner do	No	NA	No
SR19-01489319	5/14/2019	1312 W SCHUBERT AVE 60614	Shared Housing/Vacation Rental Complaint	2019-05-13-Unlicensed Rental Property-Concerned Citizen	NA	NA	No
SR19-01536683	5/21/2019	2620 N ASHLAND AVE 60614	Shared Housing/Vacation Rental Complaint	2019-05-21-Unlicensed Rental Property-Concerned Citizen	No	NA	No
SR19-01545242	5/22/2019	916 W FULLERTON AVEUnit G 60614	Shared Housing/Vacation Rental Complaint	2019-04-19-License Rules Violations (i.e., prohibited business list, owner does not live on premises);Other;Unlicensed Rental Property-Concerned Citizen	No	NA	No
SR19-01546135	5/23/2019	915 S BELL AVE 60612	Shared Housing/Vacation Rental Complaint	2019-05-23-Other-Guest Staying in Rental Property	Yes	Yes	Yes
SR19-01551376	5/23/2019	1841 S CALUMET AVE 60616	Shared Housing/Vacation Rental Complaint	2018-09-18-ONE OF THE UNITS HAS THEIR UNIT LISTED UNDER AIR B & B-Other-Guest Staying in Rental Property	No	NA	No
SR19-01559785	5/24/2019	5654 N MENARD AVE 60646	Shared Housing/Vacation Rental Complaint	2019-05-01-this location need to be kept clean front and rear yard, well maintained inside and outside, appears dilapidated and needs to be quiet,(excessive noise , parties, foot traffic residents and other people invited all the time).-Condition of Prop	No	NA	No
SR19-01560686	5/24/2019	3835 N WESTERN AVE 60618	Shared Housing/Vacation Rental Complaint	2019-05-24-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	Yes	Yes	No
SR19-01581989	5/28/2019	5236 S MOODY AVE 60638	Shared Housing/Vacation Rental Complaint	2019-05-25-DO NOT KNOW IF BNB IS LICENSED CHARGING \$85 PER NIGHT AND THEIR PATRONS ARE TAKING UP PARKING SPACES IN THE AREA-Other-Concerned Citizen	No	NA	No
SR19-01604119	5/31/2019	870 N FRANKLIN ST 60610	Shared Housing/Vacation Rental Complaint	2019-05-21-Unlicensed Rental Property-Concerned Citizen	Yes	Yes	No
SR19-01606111	5/31/2019	3722 S CALUMET AVE 60653	Shared Housing/Vacation Rental Complaint	2019-04-23-Unlicensed Rental Property-Concerned Citizen	Yes	Yes	No
SR19-01607652	5/31/2019	1342 N GREENVIEW AVEUnit 2 60642	Shared Housing/Vacation Rental Complaint	2019-05-30-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);License Rules Violations (i.e., prohibited business list, owner does not live on premises);Unlicensed Rental Property-Concerned Citizen	Yes	No	No
SR19-01608670	6/1/2019	1342 N GREENVIEW AVEUnit 2 60642	Shared Housing/Vacation Rental Complaint	2019-05-04-Garbage left on upper balcony and overflowing in alley due to excessive and unauthorized parties.-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);Unlicensed Rental Property-Concerned Citizen	NA	NA	No
SR19-01610363	6/1/2019	1342 N GREENVIEW AVEUnit 2 60642	Shared Housing/Vacation Rental Complaint	quiet neighborhood. No respect of Air BNB rules.-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);License Rules Violations (i.e., prohibited business list, owne	No	NA	No
SR19-01637037	6/5/2019	923 S LOOMIS ST 60607	Shared Housing/Vacation Rental Complaint	2019-05-08-Unlicensed Rental Property-Concerned Citizen	Yes	Yes	No

SR19-01657687	6/7/2019	2552 W WALTON ST 60622	Shared Housing/Vacation Rental Complaint	2019-06-07-they should not be renting the condo, 3rd fl., unit 3-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);Unlicensed Rental Property-Concerned Citizen	Yes	Yes	Yes
SR19-01657876	6/7/2019	55 W ERIE ST 60654	Shared Housing/Vacation Rental Complaint	2019-06-07-We are on the building prohibited list and she is still listing her unit-Unlicensed Rental Property;License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	Yes	No	No
SR19-01692584	6/12/2019	55 W ERIE ST2W 60654	Shared Housing/Vacation Rental Complaint	2019-05-11-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.)-Concerned Citizen	Yes	Yes	No
SR19-01698017	6/13/2019	2039 N ASHLAND AVEChicago IL 60614	Shared Housing/Vacation Rental Complaint	2019-06-13-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	No	NA	No
SR19-01704084	6/14/2019	1342 N GREENVIEW AVEUnit 2 60642	Shared Housing/Vacation Rental Complaint	2019-06-13-"Cleaning Crew" spent 4.5 hrs in home, took cigarette breaks outside and disturbing the owners of the busking, and then began to vacuum at almost 10pm.-Condition of Property (i.e., dirty, poor condition, etc.);License Rules Violations (i.e., pr	NA	NA	No
SR19-01717693	6/16/2019	2939 N ASHLAND AVE 60657	Shared Housing/Vacation Rental Complaint	2019-06-15-License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	No	NA	No
SR19-01718710	6/16/2019	1016 W DAKIN STApt 2 60613	Shared Housing/Vacation Rental Complaint	2019-06-03-Renter (three men) created unsafe situation, harassed and intimidated woman in the middle of the night.-Condition of Property (i.e., dirty, poor condition, etc.);Other-Guest Staying in Rental Property	Yes	Yes	No
SR19-01729813	6/18/2019	1917 W DICKENS AVE1f 60614	Shared Housing/Vacation Rental Complaint	2019-06-16-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.)-Guest Staying in Rental Property	Yes	No	No
SR19-01736007	6/18/2019	1854 N SEDGWICK ST 60614	Shared Housing/Vacation Rental Complaint	2019-06-18-License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	Yes	No	Yes
SR19-01741099	6/19/2019	2712 N ASHLAND AVE 60614	Shared Housing/Vacation Rental Complaint	2019-06-18-License Rules Violations (i.e., prohibited business list, owner does not live on premises);Unlicensed Rental Property-Concerned Citizen	Yes	Yes	Yes
SR19-01748648	6/19/2019	55 W ERIE ST 60654	Shared Housing/Vacation Rental Complaint	2019-06-19-Unit being used as air bandb against our bi-laws, and excessive noise is coming from the unit tonight and keeping people awake.-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);License Rules Violations (i.e., prohibited busines	Yes	Yes	No
SR19-01756097	6/20/2019	2802 S HOMAN AVE2 60623	Shared Housing/Vacation Rental Complaint	2019-06-06-License Rules Violations (i.e., prohibited business list, owner does not live on premises);Other;Unlicensed Rental Property-Guest Staying in Rental Property	Yes	No	No
SR19-01770391	6/22/2019	6252 W GRACE ST 60634	Shared Housing/Vacation Rental Complaint	2019-06-01-The house is occupied by a large family of 6 in bsmt with dogs and its being illegal renting in bsmt-Unlicensed Rental Property-Concerned Citizen	NA	NA	No

SR19-01792852	6/25/2019	6252 W GRACE ST 60634	Shared Housing/Vacation Rental Complaint	2019-06-24-There are more than 20 people with additional 5 dogs living in a Family house. The basement is being illegal rental and loud Pitbulls are also being kept. Owner does not live in premise and tenants are constantly exiting and entering with exces	NA	NA	No
SR19-01825837	6/29/2019	1956 N WILMOT AVE 60647	Shared Housing/Vacation Rental Complaint	2019-06-29-Rooftop deck has become a party place for purchased entry causing noise across alley - people at party saying it is just Alrbnb.-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.)-Concerned Citizen	No	NA	No
SR19-01856954	7/3/2019	2657 W FULLERTON AVE 60647	Shared Housing/Vacation Rental Complaint	2019-01-01-Condition of Property (i.e., dirty, poor condition, etc.);Excessive Noise (i.e., loud parties, foot traffic in & out, etc.)-Guest Staying in Rental Property	Yes	No	No
SR19-01860239	7/4/2019	1140 W NEWPORT AVE 60657	Shared Housing/Vacation Rental Complaint	2019-07-04-on going-Other-Concerned Citizen	Yes	Yes	No
SR19-01869420	7/5/2019	6341 S OAKLEY AVEBASEMENT 60636	Shared Housing/Vacation Rental Complaint	2019-07-01-THERE IS WATER COMING UP IN THE DRAIN IN THE BASEMENT THAT HAVE STANDING FLIES AND BUGS CRAWLING AROUND. THERE IS PEOPLE GOING IN AND OUT THE HOUSE HAVE CONTACT THE LOCAL POLICE WHICH TOLD ME TO CONTACT THE CITY FOR THE PROPERTY TO BE CLOSE DO	Yes	No	No
SR19-01873521	7/6/2019	3039 N LINCOLN AVE 60657	Shared Housing/Vacation Rental Complaint	2019-07-06-Condition of Property (i.e., dirty, poor condition, etc.);Unlicensed Rental Property-Concerned Citizen	No	NA	No
SR19-01884375	7/15/2019	210 S DESPLAINES ST 60661	Shared Housing/Vacation Rental Complaint	2019-06-01-There is a two way service road behind the building, between Quincy and Adams Streets. People (non residents) working in the neighborhood, have begun illegally parking their cars during the day, creating congestion and preventing two way traffi	NA	NA	No
SR19-01887517	7/8/2019	2234 W WARREN BLVD 60612	Shared Housing/Vacation Rental Complaint	2019-07-01-Unlicensed Rental Property-Concerned Citizen	Yes	NA	Yes
SR19-01942087	7/14/2019	3039 W FLOURNOY ST 60612	Shared Housing/Vacation Rental Complaint	2019-07-01-THE BACK IS OPEN FOR DRUG DEALERS ACCES TO HIDE DRUG AND WEAPONS-Condition of Property (i.e., dirty, poor condition, etc.)-Concerned Citizen	NA	NA	No
SR19-01947850	7/15/2019	1934 N BISSELL ST 60614	Shared Housing/Vacation Rental Complaint	2019-07-08-Unlicensed Rental Property-Concerned Citizen	Yes	Yes	No
SR19-01981307	7/18/2019	2008 N FREMONT ST 60614	Shared Housing/Vacation Rental Complaint	2019-07-09-Unlicensed Rental Property-Concerned Citizen	Yes	Yes	No
SR19-01989104	7/19/2019	5923 N OCONTO AVE 60631	Shared Housing/Vacation Rental Complaint	2019-06-29-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.)-Concerned Citizen	Yes	Yes	No
SR19-01989289	7/19/2019	1726 N SEDGWICK ST 60614	Shared Housing/Vacation Rental Complaint	2019-07-09-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	Yes	Yes	No

SR19-01989510	7/19/2019	1726 N SEDGWICK ST 60614	Shared Housing/Vacation Rental Complaint	2019-07-09-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	Yes	Yes	No
SR19-02006368	7/22/2019	4517 N MONTICELLO AVE 60625	Shared Housing/Vacation Rental Complaint	2019-07-22-Other-Concerned Citizen	No	NA	No
SR19-02025548	7/24/2019	4517 N MONTICELLO AVE 60625	Shared Housing/Vacation Rental Complaint	2019-07-01-Operating AirBnB for up to 16 guests in a residential neighborhood. No license number on AirBnB. Does not use the home as primary residence and rents it out continuously as a vacation rental. Owner lives in Florida; no homeowner's exemption.-Li	No	No	No
SR19-02038581	7/25/2019	10834 S RHODES AVE 60628	Shared Housing/Vacation Rental Complaint	2019-07-08-This is an ongoing condition, every year I have to call or do a service request on this property. The home owner refuses to cut his grass or the weeds growing through his fence covering my walk til the alley and behind my gate.-Condition of Pr	Yes	No	No
SR19-02041248	7/25/2019	77 W HURON ST 60654	Shared Housing/Vacation Rental Complaint	2019-01-01-License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	Yes	Yes	No
SR19-02084497	7/31/2019	1726 N SEDGWICK ST 60614	Shared Housing/Vacation Rental Complaint	2019-07-07-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.)-Concerned Citizen	Yes	Yes	No
SR19-02087019	7/31/2019	2115 E 97TH ST 60617	Shared Housing/Vacation Rental Complaint	2019-07-01-Over grown property-Condition of Property (i.e., dirty, poor condition, etc.)-Concerned Citizen	NA	NA	No
SR19-02090103	7/31/2019	1239 N CLEAVER ST 60642	Shared Housing/Vacation Rental Complaint	2019-07-31-Condition of Property (i.e., dirty, poor condition, etc.);Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	Yes	No	No
SR19-02100287	8/2/2019	3100 W 44TH ST 60632	Shared Housing/Vacation Rental Complaint	2019-08-01-no hot water, roommates smoking weed and doing drugs-Condition of Property (i.e., dirty, poor condition, etc.);Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);License Rules Violations (i.e., prohibited business list, owner doe	Yes	Open	No
SR19-02167804	8/9/2019	5928 S SAWYER AVE 60629	Shared Housing/Vacation Rental Complaint	2019-06-01-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);Condition of Property (i.e., dirty, poor condition, etc.);License Rules Violations (i.e., prohibited business list, owner does not live on premises);Unlicensed Rental Property-Co	No	NA	No
SR19-02184865	8/12/2019	3712 S MICHIGAN AVE75 EAST 60653	Shared Housing/Vacation Rental Complaint	2019-08-12-Condition of Property (i.e., dirty, poor condition, etc.)-Concerned Citizen	Yes	Yes	No
SR19-02193522	8/13/2019	1620 S MICHIGAN AVE 60616	Shared Housing/Vacation Rental Complaint	2019-08-05-Unlicensed Rental Property-Concerned Citizen	Yes	Yes	Yes

SR19-02198383	8/13/2019	55 W ERIE ST 60654	Shared Housing/Vacation Rental Complaint	2019-08-12-We are on the no Airbnb buildings list.-License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	Yes	Yes	No
SR19-02215040	8/15/2019	1049 N HOYNE AVE 60622	Shared Housing/Vacation Rental Complaint	2019-08-15-Condition of Property (i.e., dirty, poor condition, etc.)-Guest Staying in Rental Property	Yes	Yes	No
SR19-02215153	8/15/2019	2134 N DAMEN AVE 60647	Shared Housing/Vacation Rental Complaint	2019-08-15-THEY ARE OVERCHARGING BY 6% ON THE TAXES FOR THE VRVO. THEY HAVE THERE VACATIONS LISTED ON THERE PLATFORM-Other-Guest Staying in Rental Property	Yes	Yes	No
SR19-02247663	8/19/2019	1355 N SANDBURG TER1507 60610	Shared Housing/Vacation Rental Complaint	2019-08-19-License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	Yes	Yes	No
SR19-02261182	8/21/2019	2910 S PARNELL AVE 60616	Shared Housing/Vacation Rental Complaint	2019-08-10-I'm concerned about safety as I frequently find the Airbnb guests in my backyard because they can't get a hold of the owner. I let my dog out in the yard, I have found my gate open on several occasions.-Unlicensed Rental Property;Other-Concerne	Yes	Yes	No
SR19-02286082	8/23/2019	916 W BARRY AVE 60657	Shared Housing/Vacation Rental Complaint	2019-08-23-The owners no longer live in the house. The weeds, lawn and vines are overgrowing into both other neighbors yards. There is trash in the front lawn and the vines are also now overgrowing onto the sidewalk. Rats are living on the sides of the ya	Yes	Open	No
SR19-02295805	8/24/2019	849 N DEARBORN ST 60610	Shared Housing/Vacation Rental Complaint	2019-08-01-owner of property lives out of state and rents to a party that has continued to Airbnb the property.-Condition of Property (i.e., dirty, poor condition, etc.);Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);License Rules Viola	Yes	Open	No
SR19-02297289	8/24/2019	4017 N AVERS AVE 60618	Shared Housing/Vacation Rental Complaint	2019-08-24-loud music, large gathering in the backyard late at night.- Excessive Noise (i.e., loud parties, foot traffic in & out, etc.)-Concerned Citizen	Yes	Open	No
SR19-02311848	8/26/2019	8422 W GREGORY ST2N 60631	Shared Housing/Vacation Rental Complaint	2019-08-09-My tenant (Aruba Iqbal) is involved in vacation rental activity without a license. Airbnb listing: https://www.airbnb.com/rooms/36199542 Tenant and Airbnb refused to stop the activity. Tenant phone [REDACTED] - Unlicensed Rental Property-Gues	Yes	Yes	No
SR19-02351020	8/30/2019	1220 W AUGUSTA BLVD 60642	Shared Housing/Vacation Rental Complaint	2019-08-26-Condition of Property (i.e., dirty, poor condition, etc.);Excessive Noise (i.e., loud parties, foot traffic in & out, etc.)-Concerned Citizen	Yes	Open	No
SR19-02376453	9/3/2019	2029 N SHEFFIELD AVE 60614	Shared Housing/Vacation Rental Complaint	2019-09-03-Unlicensed Rental Property-Concerned Citizen	NA	NA	No

SR19-02378857	9/3/2019	1900 S CLARK ST 60616	Shared Housing/Vacation Rental Complaint	2019-08-16--Maggots on ceiling -Rats in apartment-Condition of Property (i.e., dirty, poor condition, etc.)-Guest Staying in Rental Property	NA	NA	No
SR19-02412171	9/6/2019	9543 S CALHOUN AVE 60617	Shared Housing/Vacation Rental Complaint	2019-08-04-House not locked,security issue-Condition of Property (i.e., dirty, poor condition, etc.)-Concerned Citizen	Yes	Open	No
SR19-02421867	9/8/2019	5500 S SHORE DR 60637	Shared Housing/Vacation Rental Complaint	2019-09-08-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);License Rules Violations (i.e., prohibited business list, owner does not live on premises);Unlicensed Rental Property-Concerned Citizen	Yes	Open	No
SR19-02424605	9/8/2019	720 S WELLS ST 60607	Shared Housing/Vacation Rental Complaint	2019-09-08-Suspicion of unlicensed Air BnB's in the building.-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);License Rules Violations (i.e., prohibited business list, owner does not live on premises);Unlicensed Rental Property-Concerned	Yes	Yes	No
SR19-02441727	9/10/2019	5928 S SAWYER AVE 60629	Shared Housing/Vacation Rental Complaint	2019-01-10-Unlicensed car selling and excessive noise all day. Vicente Avalos and family are selling cars and fixing them in their garage illegally.-License Rules Violations (i.e., prohibited business list, owner does not live on premises);Excessive Noise	No	NA	No
SR19-02441734	9/10/2019	6655 W HAYES AVE1st & 2nd flrs 60631	Shared Housing/Vacation Rental Complaint	2019-08-26-Property Characteristics 2019 Tax Year Property Information PIN:10-31-407-009-0000-Unlicensed Rental Property-Concerned Citizen	Yes	Yes	No
SR19-02475792	9/13/2019	6128 N KENMORE AVE 60660	Shared Housing/Vacation Rental Complaint	2019-02-11-callers tenant is renting unit as air bnb even though lease prohibits tenants from renting or leasing /tenants name clinton jarriell reyna air bnb reg. #r1900037799-License Rules Violations (i.e., prohibited business list, owner does not live o	Yes	Yes	No
SR19-02487169	9/15/2019	1933 W CRYSTAL ST 60622	Shared Housing/Vacation Rental Complaint	2019-09-12-Excess garbage and discarded personal items littering the property that hasn't been picked up in months. This is an eye sore and potentially a rat and pest attraction.-Condition of Property (i.e., dirty, poor condition, etc.)-Concerned Citizen	Yes	Open	No
SR19-02495009	9/16/2019	227 E WALTON PL 60611	Shared Housing/Vacation Rental Complaint	2019-09-13-after 10pm until 4am loud raucous screaming and bawdiness-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.)-Concerned Citizen	Yes	Open	No
SR19-02518055	9/18/2019	3329 N KENMORE AVE 60657	Shared Housing/Vacation Rental Complaint	2019-09-05-Condition of Property (i.e., dirty, poor condition, etc.);Unlicensed Rental Property-Concerned Citizen	Yes	Yes	No
SR19-02545660	9/22/2019	1140 W NEWPORT AVEB 60657	Shared Housing/Vacation Rental Complaint	2019-09-21-kids doing drugs in front of Unit - and smoking in the doorway of Unit A, loitering in the driveway of Unit A and smoke going into the windows of Unit A Units A and B share a common entryway-Excessive Noise (i.e., loud parties, foot traffic in	NA	NA	No
SR19-02545719	9/22/2019	1140 W NEWPORT AVEB 60657	Shared Housing/Vacation Rental Complaint	2019-09-22-Guy urinating on my property, down my entranceway- Guy walked out of Unit B and Urinated down the common stair case and entryway shared with Unit A - I saw him and I have him on video surveillance urinating down the stairs - 12:06am-Other-Conce	NA	NA	No

SR19-02581800	9/26/2019	1414 E 48TH ST 60615	Shared Housing/Vacation Rental Complaint	2019-09-17-Unlicensed Rental Property-Concerned Citizen	Yes	Yes	No
SR19-02582702	9/26/2019	5930 N CAMPBELL AVE 60659	Shared Housing/Vacation Rental Complaint	2019-09-02-Basement t unit (potentially illegal basement unit?) being rented as a airbnb-Unlicensed Rental Property;License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	Yes	Open	No
SR19-02584310	9/26/2019	2257 W IRVING PARK RD 60618	Shared Housing/Vacation Rental Complaint	2019-09-21-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.)-Concerned Citizen	Yes	Open	No
SR19-02615796	9/30/2019	544 E 45TH ST 60653	Shared Housing/Vacation Rental Complaint	2019-09-16-Unlicensed Rental Property-Concerned Citizen	Yes	Yes	No

Exhibit T

FILED DATE: 1/17/2020 3:06 PM 2016CH15489

Service Request Number	Created Date	Service Request Address	Service Request: Type Name	Flex Answers Concatenated	Able to contact complaining witness	Form Received	Enforcement Issued	Licensed or registered unit at time of inv	Notes
17-04960938	7/27/2017	2529 W CHARLESTON ST	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Condition of Property (i.e., dirty, poor condition, etc.),Unlicensed Rental Property,Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Shared Housing (e.g., AIRBNB) - JUN 18, 2017 - [REDACTED]	Yes	Yes	Yes	Yes	
17-05921987	9/6/2017	40 E 9TH ST	Shared Housing / Vacation Rental Complaints	Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises),Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - AUG 8, 2017 - UNIT 711 IS BEING USED AS A VACATION RENTAL - UNIT HAS BEEN ISSUED VIOLATIONS	Yes	Yes	Yes	No	
18-00708735	2/20/2018	6040 S LA SALLE ST	Shared Housing / Vacation Rental Complaints	I occupied 6040 S. LaSalle Shared Jan 15, 2018 through Jan 24, 2018. (Per identification ny owner, Mr. Michael Duckworth in an airbnb email dated Jan 18, 2018). While there, I observed certain conditions which i believe meritt an investigation by the city to ensure that the conditions therein do not pose a threat to the health, safety and welfare of its transiet occupants. - Guest Staying in Rental Property - Shared Housing (e.g., AIRBNB) - JAN 24, 2018 - Condition of Property (i.e., dirty, poor condition, etc.),Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),License Rules Violations (i.e., prohibited business list, owner does not live on premises),Other,Unlicensed Rental Property	Yes	Yes	Yes	Yes	
18-00777759	2/27/2018	852 N ELSTON AVE	Shared Housing / Vacation Rental Complaints	I purchased a 4 unit residential building on Jan, 2018. One of the tenants is renting her unit on AIRBNB which was permittted under the lease of former owner. - Concerned Citizen - License Rules Violations (i.e., prohibited business list, owner does not live on premises),Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - FEB 1, 2018	Yes	Yes	Yes	No	
18-00793007	2/28/2018	40 E 9TH ST	Shared Housing / Vacation Rental Complaints	Illegal airbnb unit 711. Burnham Plaza is on the prohibited building listing - Concerned Citizen - Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - JAN 1, 2018	Yes	Yes	Yes	No	

CONFIDENTIAL: DOCUMENT PRODUCED PURSUANT TO PROTECTIVE ORDER ENTERED IN 16 CH 15489

18-00845184	3/6/2018	1726 N SEDGWICK ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.) - This property has been the site of rave parties with 60-100 people occupying a studio apartment appropriate for 1-3 people and traffic jams happening along Sedgwick at 2am with drive-by revelers, unruly bachelor parties with drunk revelers urinating from the rooftop onto our property, unruly other parties with attendees throwing apples at passers-by and on neighboring properties and rich-kid high school parties, an alternative site for the ?mom and dad are out of town so let?s have a party? party. I?d be happy to tell you about the sex scene I saw from my home glancing at one of the windows of an apartment at 1726 last winter. It was quite extraordinary?if not vulgar. Who cares that we pay more than \$20,000 in property taxes?we?re scheduled to pay \$31,000 by 2020!...On Jan 27/28, 2018 police arrived at 1:15 am, Jan 28/29 We hired an off duty police officer from 10pm to 6am to monitor activities of one day renters. On Feb 3/4, 2018 this 6 unit furnished flat has modified from short term rental property to one month leases....On Feb 20, 2017 19th district advised me that Joanne Jones Jeff Jones were not property licensed.On March 3, 2017 I organized neighbors within 500 feet to write letters to Samantha Fields. - Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),Unlicensed Rental Property - Vacation Rental (e.g., VRBO) - FEB 20, 2017	Yes	Yes	Yes	No	Specific unit number absent from complaint. 1 unit of 6 was registered
18-00861236	3/7/2018	22 W ONTARIO ST	Shared Housing / Vacation Rental Complaints	concern about possible vacation rental within her building - Concerned Citizen - Unlicensed Rental Property - Vacation Rental (e.g., VRBO)	Yes	Yes	Yes	Yes	
18-01135281	4/5/2018	1726 N SEDGWICK ST	Shared Housing / Vacation Rental Complaints	I would like to report the rental un its at 1726 N. Sedgwick are being used as party houses. Crammingin party goersand having police routinely called out in old town, I believe that these airbnb rentalsare greatly contributing to the problem. - Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),License Rules Violations (i.e., prohibited business list, owner does not live on premises),Condition of Property (i.e., dirty, poor condition, etc.),Unlicensed Rental Property - Vacation Rental (e.g., VRBO) - JAN 1, 2018	Yes	Yes	Yes	No	Specific unit number absent from complaint. 1 unit of 6 was registered
18-01212621	4/13/2018	1726 N SEDGWICK ST	Shared Housing / Vacation Rental Complaints	On April 6 the gaarden level apartment at 1726 is te site of a loud overocuppied party with a steady flow of party going traffic from 11pm to 4:30am on Sat, April 7. - Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),Condition of Property (i.e., dirty, poor condition, etc.),Unlicensed Rental Property,License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Vacation Rental (e.g., VRBO) - APR 6, 2018	Yes	Yes	Yes	No	Specific unit number absent from complaint. 1 unit of 6 was registered
18-01672893	5/31/2018	2319 N HALSTED ST	Shared Housing / Vacation Rental Complaints	I am the owner of licensed b&b lic # 2398451. It has come to my attention that my business name has been co-opted by a listing on Booking.com - Concerned Citizen - Shared Housing (e.g., AIRBNB) - MAY 8, 2018 - Other - Someone listed my home	Yes	Yes	Yes	No	
18-01823412	6/15/2018	849 N DEARBORN ST	Shared Housing / Vacation Rental Complaints	- Concerned Citizen - Condition of Property (i.e., dirty, poor condition, etc.),Excessive Noise (i.e., loud parties, foot traffic in & out, etc.),Unlicensed Rental Property,Other,License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Not Applicable - JUN 20, 2018 - Don't Know	Yes	Yes	Yes	No	

CONFIDENTIAL: DOCUMENT PRODUCED
PURSUANT TO PROTECTIVE ORDER
ENTERED IN 16 CH 15489

18-01920021	6/25/2018	2845 N MAPLEWOOD AVE	Shared Housing / Vacation Rental Complaints	For the past year my neighbors have been airbnb his home because he no longer lives there. - Concerned Citizen - Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - MAY 23, 2018	Yes	Yes	Yes	Yes
18-02034696	7/8/2018	540 N STATE ST	Shared Housing / Vacation Rental Complaints	- Vacation Rentals and Travel - MAY 10, 2018 - Cash - Other - Email communications	Yes	Yes	Yes	No
18-02163822	7/21/2018	540 N STATE ST	Shared Housing / Vacation Rental Complaints	- Apartment Rental - Through VRBO/HomeAway - JUL 11, 2018 - Credit Card - Contract	Yes	Yes	Yes	No
18-02389083	8/14/2018	6040 S LA SALLE ST	Shared Housing / Vacation Rental Complaints	The property was not found as described airbnb listing. - Concerned Citizen - Unlicensed Rental Property - Shared Housing (e.g., AIRBNB) - AUG 2, 2018	Yes	Yes	Yes	Yes
18-02811038	10/1/2018	5847 N OCONTO AVE	Shared Housing / Vacation Rental Complaints	Illegally renovated house, now 6 bedrooms that include 3 in a basement with 1 exit. - Concerned Citizen - Unlicensed Rental Property, Excessive Noise (i.e., loud parties, foot traffic in & out, etc.), License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Shared Housing (e.g., AIRBNB) - SEP 22, 2018	Yes	Yes	Yes	Yes
18-02828961	10/3/2018	1918 S MICHIGAN AVE	Shared Housing / Vacation Rental Complaints	The owner is renting the unit without approval of the City of Chicago. - Concerned Citizen - AUG 31, 2018 - Unlicensed Rental Property - Shared Housing (e.g., AIRBNB)	Yes	Yes	Yes	No
18-02829231	10/3/2018	5847 N OCONTO AVE	Shared Housing / Vacation Rental Complaints	Loud noise parties all night, too many people at one time. - Concerned Citizen - Unlicensed Rental Property, Excessive Noise (i.e., loud parties, foot traffic in & out, etc.), License Rules Violations (i.e., prohibited business list, owner does not live on premises) - Shared Housing (e.g., AIRBNB) - OCT 1, 2018	Yes	Yes	Yes	Yes
18-02830871	10/3/2018	5847 N OCONTO AVE	Shared Housing / Vacation Rental Complaints	Illegal airbnb started mid 2017. Tentants who rented house partied all night, beer bottles, used condoms and vomit up and down the block. - Concerned Citizen - Unlicensed Rental Property, Excessive Noise (i.e., loud parties, foot traffic in & out, etc.), License Rules Violations (i.e., prohibited business list, owner does not live on premises), Condition of Property (i.e., dirty, poor condition, etc.) - Shared Housing (e.g., AIRBNB) - JUN 1, 2017	Yes	Yes	Yes	Yes
18-03231282	11/26/2018	2480 N ORCHARD ST	Shared Housing / Vacation Rental Complaints	4 unit building reports an illegal AirBnb on the first floor with loud parties and clients, please investigate as they do not currently have a license - Concerned Citizen - Excessive Noise (i.e., loud parties, foot traffic in & out, etc.), Unlicensed Rental Property, Other - the unit leasee is an absentee sublet - Not Applicable - Don't Know - NOV 22, 2018	Yes	Yes	Yes	No
18-03247078	11/28/2018	2429 N CLYBOURN AVE	Shared Housing / Vacation Rental Complaints	Concerned Citizen - Shared Housing (e.g., AIRBNB) - Bed and Breakfast - Don't Know	Yes	Yes	Yes	No

CONFIDENTIAL: DOCUMENT PRODUCED
PURSUANT TO PROTECTIVE ORDER
ENTERED IN 16 CH 15489

18-03303692	12/6/2018	2429 N CLYBOURN AVE	Shared Housing / Vacation Rental Complaints	ORIGINAL BACP SR #18-03240588 - Residential - HOME - Airbnb - Thursday, Friday, Saturday, Sunday - 8 pm - Concerned Citizen - Unlicensed Rental Property - Not Applicable - DEC 5, 2018 - Don't Know	Yes	Yes	Yes	No	
SR19-00143660	1/31/2019	916 W FULLERTON AVE 60614	Shared Housing/Vacation Rental Complaint	2019-01-01-Unlicensed Rental Property-Concerned Citizen	Yes	Yes	Yes	No	
SR19-01006382	2/13/2019	11401 S Carpenter AVE 60643	Shared Housing/Vacation Rental Complaint	2019-02-05-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);Unlicensed Rental Property-Concerned Citizen	Yes	Yes	Yes	No	
SR19-01042644	2/20/2019	1420 E 48TH ST 60615	Shared Housing/Vacation Rental Complaint	2019-01-23-License Rules Violations (i.e., prohibited business list, owner does not live on premises);Unlicensed Rental Property-Concerned Citizen	Yes	Yes	Yes	No	
SR19-01159460	3/14/2019	2712 N ASHLAND AVE 60614	Shared Housing/Vacation Rental Complaint	2019-03-14-The unit at 2712 N Ashland #3 continues to be listed on airbnb and is being actively rented today (3/14/19) through Saturday (3/16/19). This building has been on the House Sharing Prohibited list since 8/4/2018.-License Rules Violations (i.e.,	Yes	Yes	Yes	No	
SR19-01179617	3/18/2019	55 W ERIE ST 60654	Shared Housing/Vacation Rental Complaint	2019-03-16-Our building prohibits Airbnb. An owner has listed despite being prohibited-License Rules Violations (i.e., prohibited business list, owner does not live on premises);Unlicensed Rental Property;Other-Concerned Citizen	Yes	Yes	Yes	Yes	2W
SR19-01225343	3/26/2019	558 W WEBSTER AVE 60614	Shared Housing/Vacation Rental Complaint	2018-06-19-Unlicensed Rental Property-Concerned Citizen	Yes	Yes	Yes	No	
SR19-01265013	4/3/2019	55 W ERIE ST2W 60654	Shared Housing/Vacation Rental Complaint	2019-04-03-License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	Yes	Yes	Yes	No	GARDEN
SR19-01310828	4/11/2019	1726 N SEDGWICK ST 60614	Shared Housing/Vacation Rental Complaint	2019-04-07-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	Yes	Yes	Yes	No	
SR19-01320173	4/12/2019	3806 S INDIANA AVE 60653	Shared Housing/Vacation Rental Complaint	2019-03-26-License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	Yes	Yes	Yes	No	
SR19-01320788	4/12/2019	4560 S MICHIGAN AVE 60653	Shared Housing/Vacation Rental Complaint	2019-03-18-License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	Yes	Yes	Yes	No	
SR19-01320863	4/12/2019	435 E OAKWOOD BLVD 60653	Shared Housing/Vacation Rental Complaint	2019-03-17-License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	Yes	Yes	Yes	Yes	Complaint was actually against 442 E Oakwood
SR19-01399036	4/28/2019	1140 W NEWPORT AVE 60657	Shared Housing/Vacation Rental Complaint	2019-04-25-A BUNCH OF DOG FECES AND DEBRIS BEHIND THIS ILLEGAL AIR B N B PROPERTY-Unlicensed Rental Property-Concerned Citizen	Yes	No	Yes	Yes	
SR19-01546135	5/23/2019	915 S BELL AVE 60612	Shared Housing/Vacation Rental Complaint	2019-05-23-Other-Guest Staying in Rental Property	Yes	Yes	Yes	No	
SR19-01657687	6/7/2019	2552 W WALTON ST 60622	Shared Housing/Vacation Rental Complaint	2019-06-07-they should not be renting the condo, 3rd fl., unit 3-Excessive Noise (i.e., loud parties, foot traffic in & out, etc.);Unlicensed Rental Property-Concerned Citizen	Yes	Yes	Yes	No	

CONFIDENTIAL: DOCUMENT PRODUCED
PURSUANT TO PROTECTIVE ORDER
ENTERED IN 16 CH 15489

FILED DATE: 1/17/2020 3:06 PM 2016CH15489

SR19-01736007	6/18/2019	1854 N SEDGWICK ST 60614	Shared Housing/Vacation Rental Complaint	2019-06-18-License Rules Violations (i.e., prohibited business list, owner does not live on premises)-Concerned Citizen	Yes	No	Yes	No	
SR19-01741099	6/19/2019	2712 N ASHLAND AVE 60614	Shared Housing/Vacation Rental Complaint	2019-06-18-License Rules Violations (i.e., prohibited business list, owner does not live on premises);Unlicensed Rental Property-Concerned Citizen	Yes	Yes	Yes	No	
SR19-01887517	7/8/2019	2234 W WARREN BLVD 60612	Shared Housing/Vacation Rental Complaint	2019-07-01-Unlicensed Rental Property-Concerned Citizen	Yes	NA	Yes	No	
SR19-02193522	8/13/2019	1620 S MICHIGAN AVE 60616	Shared Housing/Vacation Rental Complaint	2019-08-05-Unlicensed Rental Property-Concerned Citizen	Yes	Yes	Yes	No	

CONFIDENTIAL: DOCUMENT PRODUCED
PURSUANT TO PROTECTIVE ORDER
ENTERED IN 16 CH 15489

Exhibit U

FILED DATE: 1/17/2020 3:06 PM 2016CH15489

Page 1

1 STATE OF ILLINOIS)
) SS.
 2 COUNTY OF COOK)
 3
 IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
 4 COUNTY DEPARTMENT, CHANCERY DIVISION
 5
 LEILA MENDEZ and ALONSO)
 6 ZARAGOZA,)
)
 7 Plaintiffs,)
) No. 2016 CH 15489
 8 vs.)
)
 9 CITY OF CHICAGO, et al.,)
)
 10 Defendants.)
 11
 12 The deposition of CHARLES LEE taken before
 13 Terry M. Barfield, Certified Shorthand Reporter and
 14 Notary Public, taken pursuant to the provisions of the
 15 Illinois Code of Civil Procedure and the Rules of the
 16 Supreme Court thereof pertaining to the taking of
 17 depositions for the purpose of discovery at 30 North
 18 LaSalle Street, Suite 1020, Chicago, Illinois,
 19 commencing at 1:05 p.m. on September 25, 2019.
 20
 21
 22
 23
 24

Page 2

1 APPEARANCES:
 2 GOLDWATER INSTITUTE
 MR. JACOB HUEBERT
 3 500 East Coronado Road
 Phoenix, Arizona 85004
 4 Phone: (602) 462-5000
 E-mail: jhuebert@goldwaterinstitute.org
 5
 and
 6
 LIBERTY JUSTICE CENTER
 7 MR. JEFFREY SCHWAB
 190 South LaSalle Street
 8 Suite 1500
 Chicago, Illinois 60603
 9 Phone: (312) 263-7668
 E-mail: jschwab@libertyjusticecenter.org
 10
 On behalf of the Plaintiffs:
 11
 CITY OF CHICAGO - DEPARTMENT OF LAW
 12 REVENUE LITIGATION DIVISION
 MR. JASON L. RUBIN
 13 30 North LaSalle Street
 Suite 1020
 14 Chicago, Illinois 60602
 Phone: (312) 744-4174
 15 E-mail: jason.rubin@cityofchicago.org
 16 On behalf of the Defendants.
 17
 * * * * *
 18
 19
 20
 21
 22
 23
 24

Page 3

I N D E X

2 WITNESS PAGE
 3 CHARLES LEE
 4
 Examination by Mr. Huebert..... 4
 5
 Examination by Mr. Rubin..... 73
 6
 7
 8 E X H I B I T S
 9 LEE DEPOSITION EXHIBIT PAGE
 10
 No. 1 (Affidavit)..... 11
 11
 12
 (Exhibit 1 attached.)
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24

Page 4

1 (Witness sworn.)
 2 WHEREUPON:
 3 CHARLES LEE,
 4 called as a witness herein, having been first duly
 5 sworn, was examined and testified as follows:
 6 EXAMINATION
 7 BY MR. HUEBERT:
 8 Q. My name's Jason Huebert. I'll be taking your
 9 deposition today.
 10 Have you ever been deposed before?
 11 A. No.
 12 Q. So I'll be asking you a series of questions
 13 and you're required to answer fully, honestly, and to
 14 the best of your ability. When you give answers to my
 15 questions, if it's a yes-or-no answer, we'll need you to
 16 say yes or no, rather than, your know, nod or make some
 17 other sounds so it is clear on the transcript for the --
 18 and the court reporter can take it down.
 19 If you don't understand a question, please let
 20 me know what you don't understand about it and I'll try
 21 to clarify it. Otherwise, I'll assume that you did
 22 understand the question and that you're answering it
 23 fully and to the best of your ability. Okay?
 24 A. Okay.

1 Q. Did you review any documents to prepare for
 2 your deposition today?
 3 **A. Yes.**
 4 Q. What did you review?
 5 **A. My affidavit.**
 6 Q. Did you review anything else?
 7 **A. No.**
 8 Q. Now we're talking here today about the City's
 9 regulation of what it calls shared housing units and
 10 vacation rentals; is that right?
 11 **A. Yes.**
 12 Q. What's your understanding of what a shared
 13 housing unit is?
 14 **A. It is a dwelling unit or any portion therein**
 15 **used for transient occupancy, which is a period of 31 or**
 16 **fewer days that is listed on an intermediary website.**
 17 Q. Would that be a website such as Airbnb?
 18 **A. Yes.**
 19 Q. And we can also call that, like, a shared
 20 housing platform?
 21 **A. Yes.**
 22 Q. And with shared housing units, the City Code
 23 requires the platform to register everyone who lists
 24 properties in Chicago on its site with the City; is that

1 **identity verification.**
 2 Q. Can an entity like a corporation or a limited
 3 liability company be a shared housing unit operator, or
 4 does it have to be an individual, a natural person?
 5 MR. RUBIN: Objection, form of the question.
 6 You can answer.
 7 BY THE WITNESS:
 8 **A. I believe it has to be a natural person.**
 9 Q. And how about somebody who wants to register
 10 to rent out a shared housing unit, if they're not an
 11 operator; can that be an entity or does it have to be a
 12 natural person?
 13 **A. That has to be a natural person.**
 14 Q. The City also regulates what it calls vacation
 15 rentals; is that right?
 16 **A. Yes.**
 17 Q. What's your understanding of what a vacation
 18 rental is?
 19 **A. A residential unit rented for transient**
 20 **occupancy, or any portion therein for a period of 30 or**
 21 **fewer days, or 31.**
 22 Q. And a person who rents out a vacation rental
 23 has to have a license from the City; is that right?
 24 **A. Yes.**

1 correct?
 2 **A. That's correct.**
 3 Q. What information is the platform required to
 4 provide to the City for the people who it registers
 5 renting shared housing units?
 6 **A. The host's name, the address, the host's**
 7 **e-mail address, whether or not it's their primary**
 8 **residence.**
 9 Q. Is that all?
 10 **A. I believe so.**
 11 Q. The City Code also refers to something called
 12 a shared housing unit operator; is that correct?
 13 **A. That's correct.**
 14 Q. What is a shared housing unit operator?
 15 **A. The host that hosts or operates two or more**
 16 **shared housing units.**
 17 Q. And a shared housing unit operator is required
 18 to obtain a license from the City, correct?
 19 **A. Correct.**
 20 Q. Do you know what information a shared housing
 21 operator is required to provide to the City?
 22 **A. I know some of the information.**
 23 Q. Can you tell me what you know?
 24 **A. Name, birth date, home address. Some form of**

1 Q. Do you know what information a person has to
 2 provide to the City to receive a vacation rental
 3 license?
 4 **A. Yes. Name, address, home address, government**
 5 **ID at a minimum. I believe there's more.**
 6 Q. If someone rents out two or more shared
 7 housing units without getting a shared housing unit
 8 operator license, that's illegal, right?
 9 MR. RUBIN: Objection, form of the question.
 10 You can answer, if you know.
 11 BY THE WITNESS:
 12 **A. Could you repeat that question, please.**
 13 Q. Yeah.
 14 If someone is renting out two or more shared
 15 housing units, but they haven't got the shared housing
 16 unit operator license from the City, that would be
 17 illegal, right?
 18 MR. RUBIN: Renew the objection.
 19 You can answer.
 20 BY THE WITNESS:
 21 **A. Yes.**
 22 Q. And if somebody was renting out a vacation
 23 rental without obtaining a license from the City, that
 24 would be illegal, right?

FILED DATE: 1/17/2020 3:06 PM 2016CH15489

1 MR. RUBIN: Objection, form of the question.
 2 You may answer.
 3 BY THE WITNESS:
 4 **A. Yes.**
 5 Q. And if someone was renting out a shared
 6 housing unit without having been registered as a shared
 7 housing unit with the City, that would be -- that
 8 listing would be illegal, correct?
 9 MR. RUBIN: Objection, form of the question.
 10 You may answer.
 11 BY THE WITNESS:
 12 **A. No.**
 13 Q. It would not be illegal for somebody to have
 14 a -- have a listing as a shared housing unit when they
 15 have not been registered with the City?
 16 **A. Not always.**
 17 Q. When would that be legal?
 18 **A. When their registration status is still**
 19 **pending. So a final determination of whether they're**
 20 **allowed to register has not been reached yet?**
 21 Q. And do you know if that's in a City Code, or
 22 just the way the City operates as a matter of policy?
 23 **A. It's in the City Code.**
 24 Q. Apart from that exception, as far as you know,

(Lee Deposition Exhibit No. 1 marked
 as requested.)
 3 BY MR. HUEBERT:
 4 Q. Do you recognize this document?
 5 **A. Yes.**
 6 Q. What is it?
 7 **A. This is my affidavit.**
 8 Q. The affidavit that you submitted in connection
 9 with the court case named at the top of it?
 10 **A. Yes.**
 11 Q. And as far as you can tell, is it complete and
 12 accurate?
 13 **A. Yes.**
 14 Q. In paragraph 3 of this affidavit, it states
 15 that: Attached to the affidavit is a listing of all 311
 16 complaints related to shared housing and vacation
 17 rentals received from December 27, 2016, until
 18 April 5th, 2018.
 19 Do you know who made that list?
 20 **A. Yes.**
 21 Q. Who made it?
 22 **A. I did.**
 23 Q. When did you make it?
 24 **A. Sometime in April of 2018.**

1 has it always been illegal to operate a shared housing
 2 unit that has not been registered with the City as a
 3 shared housing unit?
 4 MR. RUBIN: Objection, form of the question.
 5 You can answer.
 6 BY THE WITNESS:
 7 **A. Yes.**
 8 Q. As far as you know, has it always been illegal
 9 to rent out a vacation rental without a license to do so
 10 from the City?
 11 MR. RUBIN: Objection, form of the question.
 12 You may answer.
 13 BY THE WITNESS:
 14 **A. Yes.**
 15 Q. As far as you know, has it always been illegal
 16 to rent out two or more shared housing units without a
 17 shared housing unit operator license from the City?
 18 MR. RUBIN: Objection, form of the question.
 19 You may answer.
 20 BY THE WITNESS:
 21 **A. Yes.**
 22 MR. HUEBERT: Okay. I'm now going to hand the
 23 court reporter to be marked as Exhibit 1.
 24

1 Q. Why did you make it?
 2 **A. I was asked to provide a list of 311 shared**
 3 **housing and vacation rental complaints.**
 4 Q. Who asked you to do that?
 5 **A. My boss, Ivan Capifali.**
 6 Q. Did he say why he was telling you to do it?
 7 **A. No.**
 8 Q. So at the time that you made it, you didn't
 9 know why you were making it?
 10 **A. I did know. But ...**
 11 Q. How did you find out?
 12 **A. I was -- I was forwarded a chain of e-mails.**
 13 Q. And --
 14 **A. And I read that it was related to this case.**
 15 Q. What do you remember about what that e-mail
 16 said?
 17 MR. RUBIN: I'm going to object to the extent that
 18 any part of the e-mail he's referring to calls for
 19 disclosure of attorney/client privilege.
 20 You're free to answer it, but I caution you
 21 not to disclose attorney-client privilege information.
 22 But you may answer to the extent that you're able to.
 23 BY THE WITNESS:
 24 **A. Just that I was to send him a list of 311**

FILED DATE: 1/17/2020 3:06 PM 2016CH15489

1 **complaints.**

2 Q. Okay. Do you remember any more precisely what

3 you were asked to produce?

4 **A. Yes. A breakdown or a count of specific**

5 **natures of the complaint.**

6 Q. Specific nature what? I'm sorry.

7 **A. Specific natures of the complaint.**

8 Q. But is there a specific type of complaint you

9 were asked to compile?

10 **A. Yeah, shared housing and vacation rental.**

11 Q. How did you choose the start dates for that

12 list of December 27th, 2016?

13 **A. I believe that was when that category -- the**

14 **category of complaint called shared housing and vacation**

15 **rental was created or implemented. So it starts with**

16 **the first complaint that ever came in under that**

17 **category.**

18 Q. Can you explain how you created this list?

19 **A. Yes. I created a report based on certain**

20 **fields, one of which being shared housing vacation**

21 **rental complaint types. So it's a report that -- Well**

22 **let me back up.**

23 **These complaints are in the database. There's**

24 **a program that you can report on the database and**

1 **produce Excel reports. And so that's how I generated**

2 **it.**

3 Q. So if I'm understanding correctly, you used

4 software in which you could tell it to create a

5 spreadsheet, including all complaints that referenced

6 shared housing units or vacation rentals; is that

7 correct?

8 **A. Yes. But it didn't -- it's not that they**

9 **referenced them. They were categorized as shared**

10 **housing and vacation rentals. That's the complaint**

11 **type.**

12 Q. Have you ever generated that list for that

13 type of complaint for any dates after April 5th, 2018?

14 **A. Yes.**

15 Q. What date range did that list cover?

16 **A. So I periodically report numbers and so if I**

17 **had the report numbers in August, it would have been**

18 **from inception, you know, December 2016 through**

19 **August 2019.**

20 Q. You say you report numbers. Numbers of what?

21 **A. Numbers of complaints of both shared housing**

22 **and vacation rental complaint types and other complaint**

23 **types.**

24 Q. Do you make report specifically for shared

1 housing units and/or vacation rentals, or are they

2 included in some larger report that also includes other

3 categories?

4 MR. RUBIN: Objection, form of the question.

5 You can answer.

6 BY THE WITNESS:

7 **A. Specifically for shared housing and vacation**

8 **rentals.**

9 Q. And when was last time you made a report that

10 included -- that was a list of complaints concerning

11 shared housing units and vacation rentals?

12 **A. Well, I know I did one in early August of**

13 **2019.**

14 Q. Why did you make that report?

15 **A. I was asked to by the deputy commissioner of**

16 **my department -- my division.**

17 Q. And who is that individual?

18 **A. Ivan Capifali.**

19 Q. Do you know why he asked you to do it?

20 **A. Yeah. It was for budget purposes. It was one**

21 **of several reports for budget reporting.**

22 Q. And that report would have included all of

23 shared housing unit and vacation rental complaints from

24 December 27th, 2016, through the date of the report?

1 **A. It might have just been through 2000 -- from**

2 **the beginning of 2017.**

3 Q. Was there ever any other occasion where you

4 generated a report of complaints concerning shared

5 housing units or vacation rentals that you understood to

6 be for purposes of this case?

7 **A. Yes.**

8 Q. When was that?

9 **A. I don't remember exactly. It was maybe a few**

10 **months after I generated this one.**

11 Q. Is that the only other time?

12 **A. Yes.**

13 Q. Do you know whether anyone else ever generated

14 a list of complaints concerning shared housing units or

15 vacation rentals for purposes related to this case?

16 **A. No.**

17 Q. Do you know how many complaints after

18 April 5th, 2018, appeared on the most recent report you

19 generated?

20 **A. I don't recall.**

21 Q. Do you have a ballpark estimate?

22 **A. 250, maybe ballpark.**

23 Q. So that would be for the period of April 6th,

24 2018, through some date in August 2019?

FILED DATE: 1/17/2020 3:06 PM 2016CH15489

1 **A. Yes.**
 2 Q. Do you know whether the number of complaints
 3 related to vacation rentals and shared housing units per
 4 month has gone up or down since April 5th, 2018?
 5 **A. I don't know.**
 6 Q. Looking again at paragraph 3 of your
 7 affidavit, do you see it says: These complaints are
 8 transcribed from the call and are maintained BACP in the
 9 ordinary course of business?
 10 **A. Yes.**
 11 Q. Can you describe the process of how complaints
 12 come in and records of those complaints are made?
 13 **A. Yes. So a 311 operator will receive a call.**
 14 **Once they determine what the complaint is about, they'll**
 15 **select a complaint type, one of which being shared**
 16 **housing, slash, vacation rentals. They'll answer --**
 17 **they'll ask the caller a series of, you know, usually**
 18 **maybe five to ten questions that are prompted when that**
 19 **complaint type is selected. They'll record the answers.**
 20 **And just by the fact of it being selected is -- Well, it**
 21 **gets assigned to a department based on the type of**
 22 **complaint that's selected.**
 23 **Another way is Web entry. Basically someone**
 24 **making a complaint can select their own complaint**

1 entry or at least for the first entry, we see shared
 2 housing, slash, vacation rental complaint.
 3 MR. RUBIN: I'm sorry. So you're looking page 4 of
 4 your exhibit?
 5 MR. HUEBERT: That's right, where the first entry
 6 is it labeled December 27th, 2016.
 7 MR. RUBIN: Okay.
 8 BY MR. HUEBERT:
 9 Q. And so we see under type there for the first
 10 entry, shared housing, slash, vacation rental
 11 complaints. And if I understand what you just said
 12 correctly, that is a type that the person making the
 13 complaint can choose from a list; is that right?
 14 **A. Yes.**
 15 Q. Is there another type under which complaints
 16 about hotels would fall?
 17 **A. Yeah. There are -- Yes.**
 18 Q. What type would that be?
 19 **A. There are a few, depending on the nature of**
 20 **the complaint.**
 21 Q. So what are they?
 22 **A. Operating without a business license.**
 23 **Sidewalk cafe complaints. It's possible that they can**
 24 **come in as minimum wage or paid sick leave complaints.**

1 **category and answer it, their own questions. The**
 2 **website is essentially the intake agent.**
 3 Q. Does this list that you attached to your
 4 affidavit include Web entry complaints or only calls?
 5 **A. It also includes Web entry complaints.**
 6 Q. You may have had said this in part already.
 7 But the person at 311 who takes the call, is
 8 there a particular series of questions they're required
 9 to ask?
 10 **A. Yes.**
 11 Q. Do you know what those questions are?
 12 **A. Well, it varies from complaint type.**
 13 **But do you mean for shared housing?**
 14 Q. Yes, for shared housing units and vacation
 15 rentals.
 16 **A. Yeah. For the most part it's are you a guess**
 17 **or a concerned citizen. What was the date of the**
 18 **incident. Pick from the following the nature of the**
 19 **complaint. And you can select one or multiple options.**
 20 **And there's always -- there's always some free form**
 21 **additional information that can be added.**
 22 Q. If you look at the first page of the list
 23 after your affidavit, that includes the actual complaint
 24 details. So under the heading type, we see for each

1 **And public vehicle, slash, valet.**
 2 Q. So there's no hotel specific type as there is
 3 for shared housing and vacation rental complaints?
 4 **A. No.**
 5 Q. So if somebody wanted to complain about
 6 conditions in the hotel where they're staying being
 7 unacceptable, what type would that fall under?
 8 **A. Oh, I'm sorry. I did forget to mention one.**
 9 **Consumer fraud.**
 10 Q. And that's what the last one I -- that's where
 11 complaint about conditions in a hotel would be filed
 12 under?
 13 **A. Yes.**
 14 Q. And on the same page we were looking at with
 15 the spreadsheet, the next column is labeled complaint
 16 category.
 17 Who decides what category to put a complaint
 18 in?
 19 **A. So these are -- So the caller or complaining**
 20 **witness will -- This is the situation where they choose**
 21 **one or more of, you know, maybe five or six of the**
 22 **options. So, yeah, it's the caller that chooses.**
 23 Q. I'm sorry. So there are five or six total
 24 options to choose from for complaint category?

FILED DATE: 1/17/2020 3:06 PM 2016CH15489

1 **A. Yes.**

2 Q. Do you recall what they are?

3 **A. Yeah. Condition of the property. Excessive**

4 **noise. Unlicensed rental property. Rules violations.**

5 **That might be it.**

6 Q. And those would be the categories, regardless

7 of the type of complaint?

8 **A. No. They're specific to shared housing and**

9 **vacation rental.**

10 Q. So it looks like nuisance would be another one

11 if you look about halfway down the list on that page we

12 were just looking at. For example --

13 **A. Yeah, well -- So that's not an option.**

14 Q. So, for example, on the February 18th, 2017

15 entry, complaint category says nuisance; but you're

16 saying that's not actually an option?

17 **A. No. It was excessive noise, that's what they**

18 **selected.**

19 Q. Then how does the -- whatever is contained in

20 this complaint category field get put in there?

21 **A. I added this column.**

22 Q. So to clarify complaint category as it appears

23 here on this list, is not something chosen by the person

24 making the complaint, but it's something you selected

1 based on your review of the details?

2 **A. Yes.**

3 Q. And did you choose these from a list of

4 categories, or did you just sort of make them up as you

5 go based on what the descriptions seemed to call for?

6 **A. They are for the most part, one-to-one direct**

7 **match of whatever answer they chose. And I changed**

8 **excessive noise to nuisance just as shorthand. And then**

9 **like I said, there were multiple options to be chosen so**

10 **I wrote -- I indicated that on the report as well.**

11 Q. How were the descriptions in the description

12 field in this spreadsheet created?

13 **A. These are the answers to the flex questions.**

14 **Just Constonate, put together.**

15 Q. And who puts these -- who put these together?

16 **A. This is the report. The report will take the**

17 **answers from all the questions and put them into one**

18 **box.**

19 Q. Okay. So help me understand this. If we look

20 at the first entry for December 27th, 2016, under

21 description, there's a little dash and then it says

22 guests staying in rental property.

23 Would that have been a response to a

24 particular question that was asked of the caller?

1 **A. Yes.**

2 Q. And what was the -- What question would that

3 be responding to?

4 **A. It's already of a guest staying in the rental**

5 **property or a concerned citizen.**

6 Q. Then there's another little dash and it says

7 other. What question would that be a response to?

8 **A. It -- which of the following best describes**

9 **the nature of your complaint.**

10 Q. Then there's another little dash and it says:

11 People renting downstairs blocking porch exit with their

12 stuff.

13 What would that be in response to?

14 **A. Where do you see that?**

15 Q. After other in the first description, it says

16 people renting downstairs.

17 What would that be in response to?

18 **A. During Web entry there's a box with limited**

19 **characters where you can provide a free text answer. Or**

20 **if someone's calling the operator, we'll let them**

21 **elaborate a little bit. So it's not a specific**

22 **question.**

23 Q. If it's a call and the operator let's the

24 caller elaborate, does this reflect what the person said

1 verbatim necessarily, or is it just the operator's

2 summary of what the person said?

3 **A. I wouldn't be able to answer that.**

4 Q. So as far as you know, it could be either?

5 **A. Yes.**

6 Q. Okay. Then after that there's another little

7 dash and it says: Shared housing (e.g. AIRBNB).

8 What would that be in response to?

9 **A. I don't remember.**

10 Q. Okay. After that there's a -- Well, sticking

11 with that for a minute. So where it said shared housing

12 (e.g. AIRBNB), do you know what you are alternative

13 responses that there might have been to whatever prompt

14 resulted in that same shared housing Airbnb?

15 **A. I don't.**

16 Q. Okay. After that there's another little dash

17 and it says DEC O5, 2016.

18 Do you know what that would be in response to?

19 **A. What is the date of the incident you were**

20 **reporting or when did the incident occur.**

21 Q. Okay. And then after that date there's

22 another little dash and it says: Don't know.

23 Do you know what don't know would be in

24 response to?

FILED DATE: 1/17/2020 3:06 PM 2016CH15489

1 **A. No.**

2 Q. So if we go through and look in the

3 description fields of each of these complaints listed

4 here, is it generally going to be the same pattern of

5 responses to the same prompts so that, for example, the

6 first thing would always be the answer to are you a

7 guest or a concerned citizen; and the second thing would

8 always be which of the following best describes the

9 nature of your complaint and so on?

10 **A. Yes.**

11 Q. It didn't change over time?

12 **A. No, it didn't change during this time period.**

13 Q. Has it changed since then?

14 **A. It's possible. But if so, it was a slight**

15 **variation.**

16 Q. Do you know if any other questions that were

17 added?

18 **A. No.**

19 Q. After BACP receives a complaint like the ones

20 listed on this spreadsheet, what does it do to follow

21 up?

22 **A. A staff member will contact the caller if**

23 **their contact information is available. Find out the**

24 **best way to send them a complaint form. Send the form**

1 **to them. And if it's returned, it will get assigned to**

2 **an investigator.**

3 Q. If that form is not returned, does BACP

4 conduct any further investigation in connection with

5 that complaint?

6 **A. No.**

7 Q. If BACP does not successfully contact whoever

8 made a given complaint, does it do any further

9 investigation of that complaint?

10 **A. No.**

11 Q. If someone does file a complaint, you said

12 that's been assigned to an investigator?

13 **A. Yes.**

14 Q. Can you describe the process the investigator

15 then follows?

16 **A. They'll first check whether or not the unit is**

17 **licensed or registered. They'll find any kind of online**

18 **advertising, either an intermediary listing, an**

19 **independent website, or an advertising platform.**

20 **They'll check the listing to see if it matches what the**

21 **City has on file. And if anything, they'll check for**

22 **the license number or the registration number, and which**

23 **ordinance requires is in the listing or online**

24 **advertisement.**

1 Q. Is there anything else?

2 **A. Those are the main things. And if violations**

3 **are found, they'll issue citations.**

4 Q. Would BACP have information on what happened

5 with each of these complaints?

6 **A. Yes.**

7 Q. Would it be possible to generate a version of

8 this spreadsheet that showed the result of each of these

9 complaints?

10 **A. Yes.**

11 Q. So, for example, would it be possible to

12 generate a version that showed which of these resulted

13 in a complaint form being returned by the person who

14 made the complaint?

15 **A. Yes.**

16 Q. And would it show -- would it be possible to

17 generate a version of this spreadsheet that showed which

18 of these complaints resulted in a citation?

19 **A. Yes.**

20 Q. And would it be possible to generate a version

21 of this spreadsheet that showed which of these

22 complaints -- I'll start that over.

23 Would it be possible to generate a version of

24 this spreadsheet that showed for -- of which these

1 complaints BACP was unable to contact the person who

2 made the complaint?

3 **A. Yes.**

4 Q. Okay. When you generated your most recent

5 spreadsheets containing the list of shared housing and

6 vacation rental complaints, did it include any of that

7 information that we've just talked about, about whether

8 the person returned the form or you were able to contact

9 them, whether there was a citation?

10 **A. Yes.**

11 Q. Did it include all of those things?

12 **A. Actually, no, it wasn't that specific.**

13 **There's a handful of discreet outcome options and that's**

14 **what it contains. So it's not as specific as citation**

15 **issued; it just says force will be taken.**

16 Q. Do you know what percentage of the complaints

17 listed here resulted in some manner of enforcement

18 taken?

19 **A. No.**

20 Q. Do you have a ballpark estimate?

21 **A. No.**

22 Q. Do you know whether it was -- it would be

23 under 50 percent?

24 **A. I think so.**

FILED DATE: 1/17/2020 3:06 PM 2016CH15489

1 Q. Do you know whether it would be under
 2 40 percent?
 3 **A. No.**
 4 Q. You don't know one way or the other?
 5 **A. No. I'm sure I'd just be going by memory.**
 6 Q. Is it possible that the facts alleged by some
 7 of the callers who made these complaints aren't true?
 8 MR. RUBIN: Objection, form of the question, lack
 9 personal knowledge.
 10 But you can answer, if you're able to.
 11 BY THE WITNESS:
 12 **A. Yes, it's possible.**
 13 Q. Do you know how many of these complaints were
 14 truthful?
 15 MR. RUBIN: Objection, form of the question.
 16 You can answer it.
 17 BY THE WITNESS:
 18 **A. No.**
 19 Q. Is it possible that some things these callers
 20 were complaining about weren't actually violations of
 21 the law, even if the facts alleged were true?
 22 MR. RUBIN: Objection, form of question.
 23 You may answer.
 24 BY THE WITNESS:

1 **A. Excessive noise.**
 2 Q. Okay. Now, right before that in paragraph 4,
 3 you said excessive noise. So excessive and neighborhood
 4 disturbances are the same thing?
 5 **A. Yes.**
 6 Q. When someone complains about noise, could it
 7 be sometimes that the noise in question isn't actually
 8 legally excessive, but the person complaining just
 9 doesn't like it?
 10 MR. RUBIN: Objection, form of question.
 11 You may answer.
 12 BY THE WITNESS:
 13 **A. Yes, that's possible.**
 14 Q. From this spreadsheet you can't tell whether
 15 that's the case with any given one of these, can you?
 16 **A. No.**
 17 Q. In paragraph 4 of your affidavit, what do you
 18 mean by rules violations?
 19 **A. Rules or ordinance that apply specifically**
 20 **that shared housing and vacation rental units -- So**
 21 **that's -- an example is in units, in dwellings,**
 22 **single-family homes, or multiunit buildings that contain**
 23 **two to four units the host -- it has to be the host's**
 24 **primary residence. If it's not, it's a rules violation.**

1 **A. Yes, it's possible.**
 2 Q. Do you know how many of these complaints
 3 involved things that were actually violations of the
 4 law?
 5 **A. No.**
 6 Q. Is it possible that some things these callers
 7 were complaining about were issues outside of BACP's
 8 jurisdiction?
 9 **A. Yes.**
 10 Q. Do you know how many of these complaints
 11 involved issues that were outside of BACP's
 12 jurisdiction?
 13 **A. No.**
 14 Q. Looking at the affidavit again, specifically
 15 paragraph 4, do you see it says: Many of the complaints
 16 relate to nuisances, excessive noise, neighborhood
 17 disturbances, rules violations, and conditions of the
 18 property?
 19 **A. Yes.**
 20 Q. What do you mean by many?
 21 **A. I don't know. I mean, just that there were --**
 22 **there were some.**
 23 Q. In paragraph 4 of the affidavit, what did you
 24 mean by neighborhood disturbances?

1 Q. Looking now at paragraph 5 of your affidavit,
 2 do you see where it says: Specifically because the
 3 complaints relate to home sharing and vacation rentals,
 4 the offending parties, usually an out-of-town guest
 5 whose identity is unknown?
 6 **A. Yes.**
 7 Q. Now, sometimes when the person complains about
 8 a property that's used for vacation rentals or as a
 9 shared housing unit, they're complaining about something
 10 the owner or host is supposedly doing wrong, not
 11 something the guests is doing wrong; is that right?
 12 **A. Sometimes that's the case; sometimes not.**
 13 Q. So, for example, something categorized as a
 14 rules violation could be something the owner did wrong,
 15 such as renting without a license or renting where it's
 16 prohibited?
 17 **A. Yes.**
 18 Q. Do you know what percentage of the complaints
 19 in the list you have attached to your affidavit are
 20 about something the owner is allegedly doing wrong
 21 rather than about guest behavior?
 22 **A. Well, there are -- there are 23 out of 132**
 23 **that mention rules violation.**
 24 Q. And you would assume that all of the rules

FILED DATE: 1/17/2020 3:06 PM 2016CH15489

1 violations would be violations by the owner?
 2 **A. Yes.**
 3 Q. Could things falling under other categories
 4 also be violations by an owner?
 5 **A. Yes.**
 6 Q. And do you know how many things falling into
 7 those other categories on this list are violations by an
 8 owner rather than by a guest?
 9 **A. No.**
 10 Q. Do you know whether most of them are
 11 violations by guests rather than owners?
 12 **A. Could you repeat that, please.**
 13 Q. Do you know whether most of the complaints
 14 listed here are complaints about guests rather than
 15 complaints about owners?
 16 **A. No.**
 17 Q. If you could turn to the page that -- is it --
 18 that precedes the list of complaints, that's a
 19 spreadsheet with zip codes and numbers on it.
 20 **A. Yes.**
 21 Q. Do you see what I'm talking about?
 22 Across the top there one of the categories is
 23 condition of property. And if there is a complaint
 24 about condition of property, would that presumably be a

1 Q. Looking back at the affidavit, paragraph 5
 2 says that: Out-of-town guests identities are unknown.
 3 But the hosts of shared housing units or vacation
 4 rentals are required to maintain their guests'
 5 information, aren't they?
 6 **A. Yes.**
 7 Q. And the City can obtain that information from
 8 the hosts if you request it, correct?
 9 **A. Yes.**
 10 Q. Also in paragraph 5 of the affidavit, do you
 11 see where it says: Often the property host is not on
 12 location to help address the complaint?
 13 **A. Yes.**
 14 Q. What is your basis for that statement?
 15 **A. For vacation rentals and shared housing and**
 16 **plants -- and units, the host isn't necessarily the**
 17 **property owner. So unlike a bed and breakfast, which is**
 18 **an owner-occupied, the owner's there; and if not, the**
 19 **manager's there.**
 20 **Hotels generally have 24/7 staff. Vacation**
 21 **rentals and shared housing unit or renter could be**
 22 **renting out the whole unit while they're not there.**
 23 Q. Okay. Just so we're clear, so where it says
 24 property host that could be the owner of the property,

1 complaint about something the owner has done or hasn't
 2 done, rather than a complaint about guest behavior?
 3 **A. Not necessarily.**
 4 Q. Okay. How could a condition of property
 5 complaint relate to guest behavior?
 6 **A. Littering, damage to the exterior.**
 7 Q. Do you know how many condition of property
 8 items in this list pertain to guest behavior rather than
 9 an owner's failure to properly maintain the property?
 10 **A. No.**
 11 Q. Do you know whether most of them are about
 12 guests or about owners?
 13 **A. No.**
 14 Q. On the right side of this spreadsheet before
 15 the grand total column, there's a column that says
 16 unlicensed. And if somebody is unlicensed, that would
 17 be something done by an owner rather than something done
 18 by a guest; because it's the owner's responsibility to
 19 be licensed, correct?
 20 **A. Correct.**
 21 Q. There's a category there called unknown. What
 22 does that mean?
 23 **A. Other. It means other that was selected as**
 24 **the nature of complaint.**

1 or it could be somebody who, say, leases the house and
 2 then rents it out as a shared housing or vacation
 3 rentals; property hosts encompasses either of those
 4 things?
 5 **A. Yes.**
 6 Q. And then if somebody rents out their place as
 7 a shared housing unit or vacation rental, they might or
 8 might not be at the location, right, while it's being
 9 rented?
 10 **A. Right.**
 11 Q. For example, you could be renting out part of
 12 your house to somebody or you could be renting out a
 13 unit in a building that has another unit where you live?
 14 **A. Those are two possibilities.**
 15 Q. Do you know what percentage of short-term
 16 rentals of either category are by hosts or owners who
 17 stay on the property during the rental? And when I say
 18 "stay on the property," I mean either they're in the
 19 same unit or they're in another unit in the same
 20 building.
 21 **A. No.**
 22 Q. Do you have a ballpark estimate?
 23 **A. No.**
 24 Q. In paragraph 5 of the affidavit you also say:

FILED DATE: 1/17/2020 3:06 PM 2016CH15489

1 Even identifying the property host is sometimes
 2 difficult because host identity is not regularly
 3 provided to BACP by the shared housing platforms like
 4 Airbnb. Do you see what I'm talking about?
 5 **A. Yes.**
 6 Q. Isn't Airbnb or any platform like that
 7 required to provide host identity because they're
 8 required to register each shared housing unit owner?
 9 **A. Yes, they are required to, but that's not**
 10 **always the case.**
 11 Q. So are you saying that the Airbnb doesn't
 12 comply with the law?
 13 MR. RUBIN: Objection, form of the question.
 14 You can answer, if you know.
 15 BY THE WITNESS:
 16 **A. I can say that there's either data that's not**
 17 **provided, or it's erroneous and it's -- there's nothing**
 18 **at the address in question.**
 19 MR. RUBIN: I just want to stop for one second. I
 20 need to go to the restroom.
 21 MR. HUEBERT: Okay.
 22 (A short break was had.)
 23 MR. HUEBERT: All right. I'm ready to resume.
 24 Can I ask the court reporter to read back the

1 last question and answer.
 2 (Record read as requested.)
 3 BY MR. HUEBERT:
 4 Q. Can you explain what you mean by there's
 5 nothing at the address in question?
 6 **A. Say we're trying to verify a registration, we**
 7 **find the listing on Airbnb. We know the address that's**
 8 **shown in the listing, even though Airbnb doesn't display**
 9 **the address, you can tell by the map and exterior and**
 10 **interior photos. When you -- when you look in the**
 11 **registration system for data at that address, there's**
 12 **nothing there. You can also search by -- in the**
 13 **registration system, you can search by host name and**
 14 **nothing comes up by host name either.**
 15 Q. Do you know how many shared housing unit
 16 registrations have erroneous data of the sort you
 17 described?
 18 **A. Not offhand, no.**
 19 Q. Do you have a ballpark percentage?
 20 **A. No.**
 21 Q. Do you think it's more than 10 percent?
 22 **A. I really don't know.**
 23 Q. How many instances of that are you personally
 24 aware of?

1 MR. RUBIN: Objection, form of the question.
 2 You can answer, if you know.
 3 BY THE WITNESS:
 4 **A. I don't know exactly. But of the ones that**
 5 **we've looked at, maybe 10 percent.**
 6 Q. 10 percent of what?
 7 **A. What number?**
 8 Q. I'm asking you how many instances of erroneous
 9 data of the sort you mentioned are you familiar with?
 10 So I'm asking for a number, not a percentage.
 11 MR. RUBIN: Do you have a timeframe?
 12 MR. HUEBERT: Whatever timeframe he was referring
 13 to in the affidavit.
 14 BY THE WITNESS:
 15 **A. Well, let me think. I know I know of maybe**
 16 **five. But I -- I don't know. Yeah, I would say I know**
 17 **of at least five.**
 18 Q. When you find out, what does the City do about
 19 it?
 20 **A. Cite the host.**
 21 Q. How does the city identify the host?
 22 **A. When we can identify the host, it's by**
 23 **matching the data that they've provided to the**
 24 **intermediary, which is provided to the City against what**

1 **is posted online on the actual listing. And there's**
 2 **another law enforcement database called Accurint, which**
 3 **can be used to look up home addresses.**
 4 Q. Do you know of any instance where there's
 5 erroneous data of this kind that you could not identify
 6 the host?
 7 BY THE WITNESS:
 8 **A. Yes.**
 9 Q. How many times has that happened?
 10 **A. Can't say it for sure. I know that there was**
 11 **at least one that I looked at myself.**
 12 Q. As we said before, people who rent out more
 13 than one shared housing unit are required to get a
 14 shared housing unit operator license from the City,
 15 correct?
 16 **A. Correct.**
 17 Q. And have you ever had trouble identifying
 18 somebody who was acting as a shared housing unit
 19 operator?
 20 **A. I, myself wasn't involved in trying to locate**
 21 **an operator or determine who an operator is.**
 22 Q. So to be clear, you have no personal knowledge
 23 of that ever happening?
 24 **A. No, that's correct.**

FILED DATE: 1/17/2020 3:06 PM 2016CH15489

1 Q. Are you aware of any instances in which the
 2 City was unable to identify the operator of a vacation
 3 rental?
 4 **A. I don't remember offhand.**
 5 Q. So you're not -- You have no personal
 6 knowledge that you can recall of any instance of that?
 7 **A. Not that I can recall right now.**
 8 Q. And to be clear, it's not that you can't
 9 remember -- it's not just that you can't remember any
 10 specific instance, but you don't remember it ever
 11 happening, correct?
 12 **A. I don't remember any specific instances.**
 13 Q. But do you remember it happening without
 14 remembering specifics?
 15 **A. Yes.**
 16 Q. So you do recall instances in which the City
 17 was unable to identify the operator of a vacation
 18 rental?
 19 **A. Yes.**
 20 Q. How many instances do you recall?
 21 **A. At least one.**
 22 Q. When was that?
 23 **A. Summer of 2017; July, I think.**
 24 Q. Do you know how many 311 calls complaining

1 about hotels or bed and breakfasts the City received
 2 from December 27th, 2016, through April 5th, 2018?
 3 **A. That BACP received?**
 4 Q. Yes.
 5 **A. Approximately 30.**
 6 Q. Okay. And how do you know that?
 7 **A. I looked at it. I checked for complaints**
 8 **against hotels.**
 9 Q. Okay. What exactly did you do?
 10 **A. I located all licensed hotels and checked for**
 11 **complaints.**
 12 Q. Earlier you identified various types of
 13 complaints under which complaints about hotels might
 14 fall such as operating without a business license,
 15 sidewalk cafe complaints, minimum wage or paid sick
 16 leave complaints, things related to vehicle in valet,
 17 and consumer fraud.
 18 Would all of those types of complaints be
 19 directed to BACP?
 20 **A. Yes.**
 21 Q. Are there any types of complaints related to
 22 hotels that might be sent to a different department?
 23 **A. I believe so.**
 24 Q. Do you know what they are?

1 **A. Not specifically, but buildings violations,**
 2 **health, if there's a restaurant.**
 3 Q. Did the search that you mentioned that you
 4 conducted that had 30 results, would it have included
 5 those complaints that would have gone to other
 6 departments or only those that would have gone to BACP?
 7 **A. Only BACP.**
 8 Q. Of the 30 instances of complaints against
 9 hotels and bed and breakfast that you had mentioned, do
 10 you know how many of those resulted in enforcement
 11 action?
 12 **A. No, I don't.**
 13 Q. So to make sure I understand the process that
 14 you followed, you ran a search of complaints for every
 15 address at which a hotel or bed and breakfast is
 16 registered?
 17 **A. Yes.**
 18 Q. So that was like -- Do you know how many
 19 hotels there are in the city?
 20 **A. Around 200.**
 21 Q. And do you know how many bed and breakfasts
 22 there are?
 23 **A. 26.**
 24 Q. Okay. And so you conducted about 226

1 searches?
 2 **A. Well, again, I ran a report for complaints at**
 3 **those addresses.**
 4 Q. So did that require one search for each
 5 property, or is there a way that you did one search that
 6 encompassed all of those properties?
 7 **A. It's one search that encompassed all of those**
 8 **properties. I can enter multiple addresses and produce**
 9 **the complaints at any of those -- any and all of those**
 10 **addresses.**
 11 Q. So you entered about 226 addresses in a single
 12 search?
 13 **A. Yes.**
 14 Q. Have you run searches specific to hotels and
 15 bed and breakfasts after April 5th, 2018?
 16 **A. No.**
 17 Q. Do you know how many 311 calls complaining
 18 about hotels or bed and breakfasts the City has receive
 19 since April 5th, 2018?
 20 **A. No.**
 21 Q. Do you know of any other ways people might
 22 complain to the City about -- Besides 311 and the
 23 corresponding website, are there other ways that people
 24 might complain to the City about something connected to

FILED DATE: 1/17/2020 3:06 PM 2016CH15489

1 a shared housing unit or vacation rental?
 2 **A. Yes.**
 3 Q. What means are those?
 4 **A. They can complain to their alderman.**
 5 Q. Is there anything else?
 6 **A. I mean, it's -- it's possible for someone to**
 7 **call a City employee that they've dealt with for other**
 8 **reasons to make a complaint. But in that case, once my**
 9 **staff receives it, once BACP receives it, it will be**
 10 **entered into 311.**
 11 Q. If it wasn't entered into 311, it would be
 12 captured in the kind of report you've attached to your
 13 affidavit here?
 14 **A. Yes.**
 15 Q. What about other ways to complain about
 16 hotels, is there any other means besides 311 or the two
 17 things you just mentioned about complaining to the
 18 alderman or other specific officials?
 19 **A. No. The same option's available.**
 20 Q. Turning again to the list of complaints.
 21 **A. Yes.**
 22 Q. Looking again at the first one, my
 23 recollection from earlier in this deposition is that you
 24 said that shared housing, slash, vacation rental

1 complaints is a type that a person making the complaint
 2 would select from a list of choices; is that right?
 3 **A. Yes.**
 4 Q. And if you read this description of the first
 5 one, it says: People renting downstairs, blocking porch
 6 exit with their stuff; is it apparent from that
 7 description that the people renting downstairs are, in
 8 fact, renting as -- from a shared housing unit or a
 9 vacation rental?
 10 **A. Yes.**
 11 Q. And is there a way that can you tell that
 12 apart from the fact that they chose that as their type?
 13 **A. It says guests staying at rental property.**
 14 Q. But, I mean, a rental property could be short
 15 term or long term, couldn't it?
 16 **A. But tenants stay -- can stay long term and**
 17 **guests are short term.**
 18 Q. That assumes the person making the complaint
 19 uses the same terminology that you would use, right?
 20 **A. I believe that to be generally -- general**
 21 **terminology.**
 22 Q. And just to -- You may have said this, but
 23 just to refresh my memory and make sure we have it
 24 right. The first thing there where it says, for

1 example, in the first complaint, guest staying in a
 2 rental property, or in the third item listed for
 3 January 16th, 2017, it says concerned citizen, that's
 4 how the person making the complaint is identifying
 5 themselves; is that right?
 6 **A. Yes.**
 7 Q. And they're given a list of choices as to how
 8 to identify themselves?
 9 **A. Yes.**
 10 Q. And we may have said this before and I'm sorry
 11 if we have. But just to make sure I'm remembering
 12 everything correctly, one of the other choices besides
 13 guest staying at rental property and concerned citizen?
 14 **A. I believe those are the only two.**
 15 Q. If you look at the item listed on
 16 January 20th, 2017, if you just read the description of
 17 that, it doesn't say anything that would indicate that
 18 this complaint pertains to short-term rentals; is that
 19 right?
 20 **A. Which one?**
 21 Q. The entry for January 20th, 2017.
 22 **A. Not in the description category.**
 23 Q. And, in fact, if we're going to look at the
 24 words that were used, it talks about several families

1 living in a single-family home; and if we're talking
 2 about somebody living somewhere, we generally wouldn't
 3 be talking about a guest, but about a tenant, wouldn't
 4 we?
 5 MR. RUBIN: Objection, form of the question.
 6 BY THE WITNESS:
 7 **A. Correct.**
 8 Q. I don't recall whether I asked this before or
 9 after. On that item from January 20th, 2017, before the
 10 date, it says not applicable.
 11 Do you know what the category would be there
 12 where it says not applicable?
 13 **A. No, I don't recall that question.**
 14 Q. Is there a way that you could find out what
 15 that refers to?
 16 **A. Yes.**
 17 Q. How would you do that?
 18 **A. I could look up this particular -- Yeah. I**
 19 **mean, not right now, but I could look this complaint up**
 20 **in the database and find out what question that was the**
 21 **answer to.**
 22 Q. And so in your database there would be
 23 different fields and you would see what field that falls
 24 under?

FILED DATE: 1/17/2020 3:06 PM 2016CH15489

1 **A. Yes.**
 2 Q. In the preceding one from January 16th, 2017,
 3 in the description box, we see the last thing there is a
 4 "don't know". Do you know what field that would be
 5 under?
 6 **A. No.**
 7 Q. And I think I asked you about another
 8 description, but I'll ask it again.
 9 For the January 16th, 2017 entry, where it
 10 says shared housing (e.g., AIRBNB), do you know what
 11 field that falls under?
 12 **A. No.**
 13 Q. And that would be true any time that phrase
 14 shared housing e.g., AIRBNB turns up in these
 15 descriptions?
 16 **A. Correct.**
 17 Q. If you were to look at the description for
 18 February 18th, 2017 listed here, if you just read that
 19 description, it doesn't appear to be complaining about
 20 anything specific to a short-term rental, does it?
 21 **A. February 18th?**
 22 Q. February 28th.
 23 **A. Oh, 28th.**
 24 Q. I may have misspoken, I don't know.

1 there was registered as a shared housing unit or
 2 licensed as a vacation rental?
 3 **A. Yes.**
 4 Q. Okay. And would you be able then to generate
 5 a spreadsheet that would include that information as to
 6 whether that was verified?
 7 **A. Yes.**
 8 Q. Did the most recent spreadsheet you generated
 9 about shared housing and vacation rental complaints in
 10 August of 2019 include that information?
 11 **A. No.**
 12 Q. Have you ever generated a spreadsheet that
 13 included that information?
 14 **A. No.**
 15 Q. But just to confirm, you could do so?
 16 MR. RUBIN: Objection, asked and answered.
 17 But go ahead and answer again, if you can.
 18 BY THE WITNESS:
 19 **A. Yes.**
 20 Q. If you go through the spreadsheet a little
 21 further, there's an entry for June 1st, 2017.
 22 **A. Okay.**
 23 Q. Do you see that one?
 24 **A. Yes.**

1 **A. No, aside from the -- not in the description.**
 2 Q. If a person making one of these complaints
 3 does not return the complaint form, does the City check
 4 to see whether the location in question is registered as
 5 a shared housing unit or licensed as a vacation rental?
 6 **A. Yes.**
 7 Q. Okay. So, for example, the one we were
 8 talking about, the entry from February 28th, 2017,
 9 someone at BACP would have checked this address that's
 10 listed there, which is 4837 North Kenneth Avenue to
 11 determine whether that property was, in fact, registered
 12 as a shared housing unit or licensed as a vacation
 13 rental?
 14 **A. Yes.**
 15 Q. And so would you be able to generate a
 16 spreadsheet like this one that includes a column that
 17 indicates whether this was confirmed to be a shared
 18 housing unit or vacation rental?
 19 **A. So for the ones which the form was returned,**
 20 **confirming whether they were licensed or registered**
 21 **vacation or shared?**
 22 Q. Right. If somebody didn't return a complaint
 23 form, would BACP nonetheless at some point have checked
 24 the address in question to see whether the property

1 Q. And you see the person making that complaint,
 2 appears to be saying that someone is engaging in
 3 short-term rentals in a condominium unit in violation of
 4 their condo association rules.
 5 Would you agree that's the gist of this
 6 complaint?
 7 **A. Yes.**
 8 Q. Now, the City maintains a list of places where
 9 short-term rentals aren't permitted by either lease
 10 restrictions or condo association rules; is that
 11 correct?
 12 **A. Yes.**
 13 Q. What's that list called?
 14 **A. The prohibited buildings list.**
 15 Q. Okay. And so if this building involved in the
 16 complaint on June 1st, 2017 were on that list, then that
 17 would be a violation of City Code that could result in
 18 enforcement action by BACP, correct?
 19 **A. Correct. Unless like stated before, it's**
 20 **before the final determination has been made.**
 21 Q. If -- I'm sorry. You go ahead.
 22 **A. No, that's it.**
 23 Q. Okay. If, however, this particular building
 24 is not on the prohibited buildings list, then the fact

FILED DATE: 1/17/2020 3:06 PM 2016CH15489

1 that condo rules prohibit the short-term rental would
 2 not be cause for enforcement action; is that correct?
 3 **A. Not necessarily.**
 4 Q. Why not?
 5 **A. Oh, wait. I'm sorry. You said if it wasn't**
 6 **prohibited, it wouldn't necessarily be cause for ...**
 7 Q. I'll start over just to make sure we're on the
 8 same page.
 9 How does a building get on the prohibited
 10 buildings list?
 11 **A. In the case of a condo association, an officer**
 12 **of the association will submit an affidavit. And in the**
 13 **case of a -- where a landlord owns the entire building**
 14 **and there's more than five units, the landlord can**
 15 **submit an affidavit.**
 16 Q. And if a condo association hasn't placed
 17 itself on the prohibited buildings list, then the condo
 18 association isn't in a position to get relief from the
 19 City if it alleges that somebody engaged in short-term
 20 rentals in violation of the condo association rules; is
 21 that correct?
 22 MR. RUBIN: I'm sorry. Could the court reporter
 23 read that question back.
 24 (Record read as requested.)

1 **the same person complaining about different incidents;**
 2 **it could be multiple people complaining about different**
 3 **incidents. They're all different dates in this**
 4 **particular example.**
 5 Q. Would your records show whether it's the same
 6 person complaining in each of these instances?
 7 **A. Yes, if they've provided their name.**
 8 Q. If you look to the page that has complaints
 9 dated August 18th, 2017.
 10 **A. Yes.**
 11 Q. If you look at the August 18th, 2017
 12 complaint, the second of the two and look at that
 13 description, there's nothing in that description other
 14 than the reference to shared housing (e.g. AIRBNB) at
 15 the end that suggests that this complaint is about
 16 short-term tenant, is there?
 17 **A. No.**
 18 Q. And if you look at the preceding August 18th
 19 complaint, it appears that that person making that
 20 complaint is saying that there are too many occupants,
 21 different families residing in a single-family
 22 residence, which seems to be a complaint about people
 23 actually residing in a place, not a complaint about
 24 short-term guests; is that correct?

1 MR. RUBIN: I'm going to object to form of the
 2 question.
 3 But you can answer, if you're able.
 4 MR. HUEBERT: If it's not clear, I can try again.
 5 BY THE WITNESS:
 6 **A. No.**
 7 Q. Turning to the page that includes complaints
 8 dated June 12th, 2017 at the top.
 9 **A. Yes.**
 10 Q. We see on June 12th, there's a complaint about
 11 a property at 5058 North Ravenswood Avenue. And then on
 12 June 14th there's another complaint about that same
 13 property.
 14 **A. I see it.**
 15 Q. And then after that, we see there's a series
 16 of complaints including 2 on June 16th and 2 on
 17 June 19th that are all about 1430 North Dearborn Street,
 18 correct?
 19 **A. Yes.**
 20 Q. So this all might be one person complaining
 21 about the same thing; is that right?
 22 **A. Well, the dates that are in the description**
 23 **are in answer to what is the -- what is the date of the**
 24 **incident, and these are different dates. So it could be**

1 MR. RUBIN: Objection, form of the question.
 2 But you can answer, if you're able to.
 3 BY THE WITNESS:
 4 **A. Yes.**
 5 Q. And so it's possible where it says shared
 6 housing (e.g. AIRBNB), that whoever made this entry,
 7 might have chosen something other than the best choice
 8 for that field?
 9 MR. RUBIN: Objection, no question pending.
 10 BY MR. HUEBERT:
 11 Q. Correct?
 12 **A. I don't know because I'm not sure what the**
 13 **other options are.**
 14 Q. If you turn the page, there's an entry for
 15 September 4th, 2017. The second item on that page it
 16 talks about multiple families living in a single-family
 17 home, my precinct captain stated there are eight people
 18 with different last names. In addition there are six
 19 cars parked in front and on the side of the house. And
 20 then it says not applicable.
 21 Based on that description, does that seem to
 22 be a complaint about short-term rentals, or a complaint
 23 about too many people living longer term in a
 24 single-family home?

FILED DATE: 1/17/2020 3:06 PM 2016CH15489

1 MR. RUBIN: Objection, form of the question.
 2 You may answer.
 3 BY THE WITNESS:
 4 **A. Multiple families living in a single-family**
 5 **home.**
 6 Q. Okay. Looking down at September 14th, 2017,
 7 there is a description there that says stayed at hotel
 8 and received bed bug bites all over body.
 9 Do you know whether that address, 933 West
 10 Belmont Avenue is a hotel or something else?
 11 **A. I don't know offhand.**
 12 Q. Looking at the next entry after that. The
 13 description there says: Among other things, commercial
 14 residential home, hostel, bed and breakfast.
 15 Do you know whether that address, 4331 North
 16 Central Park Avenue is operating as a shared housing
 17 unit or some other kind of unit included in that
 18 description?
 19 **A. No, I don't know.**
 20 Q. And, of course, if something's being rented
 21 out that isn't licensed for any of those purposes, is it
 22 true in a sense that it doesn't fall into any of those
 23 categories because the categories are for licensed
 24 entities, not unlicensed entities?

1 housing unit, as a vacation rental, or as a bed and
 2 breakfast, if they can comply with the requirement for
 3 one of those types of licenses; is that fair to say?
 4 **A. Yes.**
 5 Q. And if they don't have any of those licenses,
 6 they're not a shared housing unit, a vacation rental, or
 7 a bed and breakfast, they're just somebody illegally
 8 renting without any proper licenses; is that fair to
 9 say?
 10 MR. RUBIN: Objection, form of the question.
 11 You may answer.
 12 BY THE WITNESS:
 13 **A. It depends on -- on how they're advertising or**
 14 **how they're listed or how they get guests.**
 15 Q. Okay. Looking down at the entry,
 16 the-next-to-last entry on this page from September 16th,
 17 2017, at 733 West Madison Street. It says that an
 18 approximate one-inch cockroach found and killed in room
 19 624 under couch, dirty desk, Crowne Plaza, West Loop.
 20 That's pretty obviously a complaint about a
 21 hotel, right?
 22 **A. It sounds like it, yeah. I mean, 624 rooms,**
 23 **yes.**
 24 Q. Do you know whether this came up when you

1 MR. RUBIN: Objection, form of the question.
 2 You may answer.
 3 BY THE WITNESS:
 4 **A. Which categories?**
 5 Q. Shared housing unit, vacation rental, bed and
 6 breakfast. If you don't have a license to do one of
 7 those things, you may be operating illegally; but you
 8 aren't actually any of those things because you only
 9 become one of those things when you have a license to do
 10 those things? Does that make sense?
 11 MR. RUBIN: Same objection.
 12 BY THE WITNESS:
 13 **A. No.**
 14 Q. No, it doesn't make sense?
 15 **A. The ordinance doesn't define it as a shared**
 16 **housing unit or vacation rental, whether it's licensed**
 17 **or not or registered or not.**
 18 Q. Well, supposing in this example from the
 19 September 15th, 2017, somebody is keeping guests in
 20 their home on a short-term basis with no kind of license
 21 at all from the City. Obviously, we don't know offhand
 22 whether that's true here, but that's what's alleged.
 23 And it's possible that whoever is doing that, might cure
 24 the problem by becoming licensed either as a shared

1 search for complaints about hotels?
 2 **A. No, I don't recall this address specifically.**
 3 Q. If there's a Crowne Plaza Hotel at this
 4 address, presumably you would have included that address
 5 in your search; is that right?
 6 **A. Yes.**
 7 Q. On the top of the page that includes an entry
 8 for September 21st, 2017; do you see that entry?
 9 **A. Yes.**
 10 Q. You see in the description it says in
 11 parenthesis: PLS, please note that CW and respondent's
 12 address match. Do you know what that means?
 13 MR. RUBIN: What page are you on, Jacob?
 14 MR. HUEBERT: Well, the pages aren't numbered, but
 15 it's the page that has September 21, 2017 at the top.
 16 BY THE WITNESS:
 17 **A. And which line?**
 18 Q. In description. On the second line of that
 19 description for that entry it says: Note that CW and
 20 respondent addresses match.
 21 Does that mean anything to you?
 22 **A. This looks like comments from BACP staff.**
 23 Q. And do you know why they would be noting that
 24 CW -- Well, do you know what CW means in this context?

FILED DATE: 1/17/2020 3:06 PM 2016CH15489

1 **A. Complaining witness.**
 2 Q. Okay. And what does respondent mean in this
 3 context?
 4 **A. The violator, a potential violator.**
 5 Q. So they put in the same address in both
 6 fields?
 7 **A. Yes.**
 8 Q. Do you see in the next entry for
 9 September 25th, 2017, in the description field it says:
 10 Running bed and a word that is apparently supposed to
 11 breakfast and then later in that description, it says
 12 bed and breakfast again?
 13 **A. Yes.**
 14 Q. So this would seem to be a complaint about an
 15 unlawful bed and breakfast, correct?
 16 **A. Yes.**
 17 Q. Is there -- when they're choosing their type
 18 for their complaint, is there a type for bed and
 19 breakfast?
 20 **A. No.**
 21 Q. Have you run a search for violations related
 22 to bed and breakfasts? Or complaints, excuse me, not
 23 violations.
 24 Have you run a search for complaints about bed

1 Q. Or the term motel?
 2 **A. No.**
 3 Q. Looking at the entry for October 16th, 2017,
 4 it says in all capital letters there: There's an old
 5 gas meter on the side of the building that beeps loudly
 6 and constantly. And then it says in parenthesis: This
 7 was the closest complaint category I could find. Sorry.
 8 So it's not apparent whether that person was
 9 complaining about short-term rentals, correct?
 10 **A. Correct.**
 11 Q. In the last item on that page dated
 12 October 30th, 2017, it says in the description: Single
 13 family chopped up into multiple units. And then not
 14 applicable for whatever field that comes next.
 15 It's not apparent that this is a complaint
 16 about short-term rentals, is it?
 17 **A. Not necessarily.**
 18 Q. In the entry dated November 30th, 2017; do you
 19 see that one?
 20 **A. Yes.**
 21 Q. It says in the description: Condition of
 22 property, i.e., dirty, poor condition, et cetera.
 23 Vacant lot, trash, broken fences, hazard to neighbors.
 24 It sounds like that's a complaint about a

1 and breakfasts?
 2 **A. Yes.**
 3 Q. And how did you run that search?
 4 **A. By searching the complaints registered or the**
 5 **complaints that occur at addresses where there are**
 6 **licensed bed and breakfasts.**
 7 Q. So basically the same process you followed for
 8 hotels, but for bed and breakfasts?
 9 **A. Yes.**
 10 Q. And so if in this example from September 25th,
 11 2017, someone was operating an unlicensed bed and
 12 breakfast, your search wouldn't have captured that?
 13 **A. If this was a licensed bed and breakfast, the**
 14 **search would have captured it.**
 15 Q. Right. But if it's unlicensed, as this
 16 complainer alleged, then your search wouldn't have found
 17 that?
 18 **A. Correct.**
 19 Q. You didn't run a search for the term bed and
 20 breakfast?
 21 **A. No.**
 22 Q. And you didn't run a search for the term
 23 hotel?
 24 **A. No.**

1 vacant lot, not about short-term rentals, correct?
 2 **A. Correct.**
 3 Q. In the entry dated January 3rd, 2018, which
 4 I'll give you a moment to find, it says in the
 5 description there: This morning we woke up to the unit
 6 spurring water all down our shared driveway created a
 7 sheet of ice all the way down to the sewer. And then it
 8 says not applicable for whatever field is left.
 9 It's not apparent that this is a complaint
 10 about short-term rentals, is it?
 11 **A. What's the date?**
 12 Q. I'm sorry. January 3rd, 2018, at 6168 North
 13 Ravenswood Avenue.
 14 **A. Okay. I see it. No.**
 15 Q. On the very next one also January 3rd, 2018,
 16 at 52 North Menard Avenue, it appears that this is a
 17 complaint about a vacant lot, not a complaint about
 18 short-term rentals, correct?
 19 **A. Correct.**
 20 Q. On January 29th, 2018, there is a complaint
 21 about 449 North Carpenter Street; do you see that one?
 22 **A. Yes.**
 23 Q. And you see that it says -- that it's a
 24 complaint about unlicensed bed and breakfasts?

FILED DATE: 1/17/2020 3:06 PM 2016CH15489

1 **A. Yes.**
 2 Q. So that appears to be a complaint about
 3 unlicensed bed and breakfasts, not a complaint about
 4 somebody not being licensed as a shared housing unit or
 5 vacation rental, correct?
 6 **A. Correct.**
 7 Q. Can you look at the entry dated February 26,
 8 2018?
 9 **A. Yes.**
 10 Q. Reading that description, does it seem to be a
 11 complaint about short-term rentals or a complaint about
 12 a property that may be used by homeless individuals or
 13 others who aren't supposed to be there?
 14 MR. RUBIN: Objection to form of the question.
 15 You can answer.
 16 BY THE WITNESS:
 17 **A. That's part of the complaint.**
 18 Q. Apart from the type listed in that entry, it's
 19 not clear from the description whether short-term
 20 rentals are going on on the property; is that fair to
 21 say?
 22 **A. Yes.**
 23 Q. Turning the page. On the next page the date
 24 field can't be seen, but we see at the top there there's

1 an entry for 4928 North Lester Avenue; do you see that?
 2 **A. I do.**
 3 Q. And here a person is complaining: Per the
 4 condo association's governing documents, units may not
 5 be leased for hotel or transient use, which is defined
 6 as an initial term. Do you see what I mean there?
 7 **A. Yes.**
 8 Q. That would only be of concern to BACP if this
 9 building is, in fact, on a prohibited buildings list,
 10 correct?
 11 **A. Not necessarily, that wouldn't be the only**
 12 **concern.**
 13 Q. What would be the other concerns?
 14 **A. There could be another reason. If it's**
 15 **unregistered or unlicensed, it could be another reason.**
 16 **And we would still ...**
 17 Q. You mean to say if this unit in question is
 18 not registered as a shared housing unit or a licensed
 19 vacation rental, then that would be of concern to BACP?
 20 **A. Yes.**
 21 Q. But apart from that, the fact that allegedly
 22 the condo association's governing documents don't allow
 23 it, would not be of concern unless the building was on
 24 the prohibited buildings list; is that correct?

1 **A. Yes.**
 2 Q. Looking at the entry on that same page for
 3 1515 West Oakdale Avenue; do you see that one?
 4 **A. Yes.**
 5 Q. If you read that description it's not apparent
 6 that the complaint is about short-term rentals except
 7 from the selection of the type and from the selection in
 8 one field of shared housing (e.g. AIRBNB); is that
 9 correct?
 10 **A. Yes.**
 11 Q. Looking at down the page, there's a listing
 12 for 448 North Carpenter Street. There it makes an
 13 allegation about someone operating a bed and breakfast,
 14 correct?
 15 **A. Yes.**
 16 Q. Looking at the next one after that about
 17 6250 Park Shore East Court. Does it appear to you from
 18 the description here that the complaint is about bed
 19 bugs in apartments on somebody's floor and not
 20 necessarily about short-term rentals?
 21 **A. Yes.**
 22 Q. And sometimes I say short-term rentals. You
 23 under- -- when I say that, is it clear to you that I'm
 24 referring to both shared housing units and vacation

1 rentals?
 2 **A. Yes.**
 3 Q. Okay. I just want to make that clear on the
 4 record and make sure we're on the same page.
 5 On the bottom of that page, there's a listing
 6 for 11 West Division Street and it says there: We don't
 7 allow residents to rent their apartments.
 8 Once again, that fact would only be of
 9 interest to the City if somebody was operating a shared
 10 housing unit or vacation rental without being registered
 11 or licensed, or if the building is on the prohibited
 12 buildings list, correct?
 13 **A. Correct.**
 14 Q. Turning back once again to the spreadsheet
 15 with all the numbers -- the zip codes and the numbers.
 16 If you add together the number of complaints that are
 17 based on rules violations and the number of complaints
 18 that are based on somebody renting out the property
 19 without a license, that's a total of 70 out of 132
 20 complaints; is that correct?
 21 **A. Rulings violation and unlicensed?**
 22 Q. Yes?
 23 **A. Yes.**
 24 Q. And that, of course, is the majority of the

FILED DATE: 1/17/2020 3:06 PM 2016CH15489

1 complaints, correct?
 2 **A. Yes.**
 3 Q. And the complaints about excessive noise, is
 4 it possible that the person making the complaint could
 5 incorrectly believe that the noise they hear is coming
 6 from a short-term rental; when, in fact, it's coming
 7 from another unit that is not a short-term rental?
 8 MR. RUBIN: Objection, form of the question.
 9 You can answer, if you know.
 10 BY THE WITNESS:
 11 **A. It's possible.**
 12 Q. And if that were true, the person in the
 13 short-term rental would also potentially be a victim of
 14 the excessive noise; is that correct?
 15 MR. RUBIN: Objection, form of the question.
 16 BY THE WITNESS:
 17 **A. Yes.**
 18 MR. HUEBERT: Why don't we take a break and we'll
 19 gather our thoughts a little bit and see if we have
 20 anything else. But we're probably getting close to
 21 being done.
 22 MR. RUBIN: Okay.
 23 (A short break was had.)
 24 MR. HUEBERT: Are we back on the record?

1 renters or short-term renters, correct?
 2 **A. Correct.**
 3 Q. So in another example on February 18th, 2017
 4 on that same page, here again it starts with guests
 5 staying in rental property, which presumably is the
 6 person staying in a short-term rental, correct?
 7 **A. Correct.**
 8 Q. And they're complaint is about excessive
 9 noise, which means excessive noise that somebody else is
 10 making, rather than that they are making themselves,
 11 correct?
 12 **A. Correct.**
 13 Q. And we don't know whether the people making
 14 excessive noise in this complaint allegedly are
 15 short-term renters or not, correct?
 16 **A. Correct.**
 17 Q. We have no reason to think it's one versus the
 18 other, based on the information we have here, correct?
 19 **A. Well, I mean, it does say shared housing.**
 20 Q. Right.
 21 This person is identifying themselves as a
 22 guest staying in rental property. They're staying in
 23 shared housing. We know that at least if they're
 24 telling the truth and identifying themselves.

1 THE COURT REPORTER: Yeah.
 2 MR. HUEBERT: Good.
 3 BY MR. HUEBERT:
 4 Q. Turning again to the list of complaints
 5 attached to your affidavit and turning again to the very
 6 first entry from December 27th, 2016.
 7 **A. Yes.**
 8 Q. As I think we covered before, at the beginning
 9 there where it says guests staying in rental property,
 10 that's the person identifying themselves, correct?
 11 **A. Correct.**
 12 Q. Okay. So in this complaint, you have a person
 13 complaining about people renting downstairs blocking
 14 porch exit with their stuff.
 15 And so this is a short-term renter complaining
 16 about what somebody else is doing, correct?
 17 **A. Yeah, it would seem that way. But, I mean, we**
 18 **can't say for sure.**
 19 Q. Right.
 20 But that's what it appears to be, which
 21 obviously we can't verify right now?
 22 **A. Right.**
 23 Q. And we don't know whether the people renting
 24 downstairs -- to which this refers -- are long-term

1 But they're complaining about hearing
 2 excessive noise. And we don't know whether that
 3 excessive noise is coming from a short-term rental or a
 4 long-short term rental; or for that matter, a retail
 5 business on a lower floor, correct?
 6 MR. RUBIN: Objection, lack of foundation and form
 7 of the question.
 8 And you can answer, if you are able to.
 9 BY THE WITNESS:
 10 **A. It's hard to say because I don't know what**
 11 **shared housing example Airbnb is in response to.**
 12 Q. Okay. But if we put that to the side, we
 13 don't know the source of the noise here. We don't if
 14 the source -- unless this field would confirm it based
 15 on what it's asking for, we don't know the source of the
 16 noise complained of here?
 17 **A. Correct.**
 18 Q. Based on this information without
 19 investigating further?
 20 **A. Correct.**
 21 Q. Do you have an approximate figure of how many
 22 shared housing units are registered in the City of
 23 Chicago?
 24 **A. I know that at one point there were 1,500, in**

FILED DATE: 1/17/2020 3:06 PM 2016CH15489

1 **that vicinity.**
 2 Q. About what time do you think that was?
 3 **A. Late 2017.**
 4 Q. Could the number be higher now?
 5 **A. Yes.**
 6 Q. Do you have any sense of what the number might
 7 be now?
 8 **A. No.**
 9 Q. Is that information you could obtain?
 10 **A. Yes.**
 11 Q. Do you know how many vacation rentals are
 12 licensed in the city?
 13 **A. Not exactly, it's not a high number. I would**
 14 **say definitely under 100.**
 15 MR. HUEBERT: That's all I have.
 16 MR. RUBIN: I have some questions.
 17 EXAMINATION
 18 BY MR. RUBIN:
 19 Q. Mr. Lee, I'm looking at your affidavit now,
 20 and if you could look at paragraph 3.
 21 **A. Okay.**
 22 Q. I'm sorry. Let me step back a moment. And
 23 counsel covered this, but I want to clarify some things.
 24 When a caller or someone who uses the Web

1 **A. No, not exactly.**
 2 Q. You do have access to that information,
 3 though, don't you?
 4 **A. Yes.**
 5 Q. So if you were to go back to your office or
 6 look in your files, you would know what those questions
 7 are?
 8 **A. Yes.**
 9 Q. And those -- the answers to those questions,
 10 that is what's in the description field in the exhibit
 11 to your affidavit; is that right?
 12 **A. Yes.**
 13 Q. There's also that column type in your -- in
 14 the exhibit on your affidavit, which we've discussed.
 15 And I just want to be clear. Is it 311 operator or is
 16 it the person calling in with the complaint, who
 17 designates the type that it is in that column?
 18 **A. The operator.**
 19 Q. Okay. Because I seem to recall on your
 20 testimony when counsel was asking you questions, that
 21 you said that the type shared housing and vacation
 22 rental complaints, that that type was chosen by the
 23 caller. Do you remember saying that?
 24 **A. No. But, I mean, I can elaborate.**

1 contacts 311, how does that call make its way to BACP?
 2 **A. By the complaint category. So the fact that**
 3 **those were -- that shared housing/vacation rental was**
 4 **selected, they're signed to BACP.**
 5 Q. Okay. You had said that there are, I think --
 6 or maybe you just identified various other categories,
 7 that complaints against hotels could fall into; do you
 8 remember that?
 9 **A. Yes.**
 10 Q. And one of the categories aside from those is
 11 this vacation rental or shared housing complaints?
 12 **A. Yes.**
 13 Q. How many categories are there that BACP has?
 14 **A. 16 in total.**
 15 Q. And so when someone calls in to 311, if that
 16 call is designated one of those 16 categories, then that
 17 call gets forwarded or sent to BACP; is that correct?
 18 **A. That's correct.**
 19 Q. And when a caller calls in, I think you had
 20 said there's a series of set questions that the 311
 21 operator asks the caller; is that right?
 22 **A. Yes.**
 23 Q. And you don't know off the top of your head
 24 now what those questions necessarily are?

1 Q. Do you remember testifying to that or you
 2 don't recall that?
 3 **A. No. I remember being asked about it, but I**
 4 **don't remember saying that.**
 5 Q. Okay. So that we're on the same page and
 6 clear, when we're looking at your exhibit here the
 7 listing of complaints and you're going across and you
 8 get to the column that says type; do you see that
 9 column?
 10 **A. Yes.**
 11 Q. It's in between the column that says zip code
 12 and the column that says complaint category?
 13 **A. Yes.**
 14 Q. Okay. And under that type what's entered
 15 there is shared housing and vacation rental complaints.
 16 Do you see that too?
 17 **A. Yes.**
 18 Q. And that's 1 of 16 different categories that a
 19 311 call can be designated by the 311 operator; is that
 20 right, for BACP?
 21 **A. For BACP, yes.**
 22 Q. And so it's not the caller who's telling the
 23 operator to put that type in, is it?
 24 **A. No.**

FILED DATE: 1/17/2020 3:06 PM 2016CH15489

1 Q. The operator is making that determination that
 2 this is a shared housing and vacation rental complaint;
 3 is that correct?
 4 **A. That's correct.**
 5 Q. And do you know how the 311 operator makes the
 6 determination of what type to classify a 311 call?
 7 **A. There is a description in the system that they**
 8 **use of each complaint type.**
 9 Q. Did they receive any training on how to
 10 determine what's -- what type of calls should be slotted
 11 into?
 12 **A. Yes.**
 13 Q. So regardless of what you can or can't tell
 14 from the various descriptions, we do know that the 311
 15 operator, after listening to the complaint or the call,
 16 has designated all of these complaints attached to your
 17 affidavit as shared housing and vacation rental
 18 complaints; is that right?
 19 **A. For the most part. But one thing I did say is**
 20 **that when it's entered on the website via the Web, there**
 21 **is no agent, so that's -- in those cases the caller**
 22 **selects.**
 23 Q. And what would they be selecting from?
 24 **A. The entire list of possible complaint types.**

1 Q. Across the entire city?
 2 **A. Yes.**
 3 Q. So when you say in your affidavit in
 4 paragraph 3 that attached to this affidavit is a listing
 5 of all 311 complaints related to shared housing and
 6 vacation rentals received from December 27, 2016, until
 7 April 5, 2018, that's an accurate statement, isn't it?
 8 **A. Yes.**
 9 Q. And it's accurate because all of the 311
 10 complaints that have been designated shared housing and
 11 vacation rental complaints by 311 were sent to you?
 12 **A. Yes.**
 13 Q. And this is that list?
 14 **A. Yes.**
 15 Q. For that timeframe?
 16 **A. Yes.**
 17 Q. And when those complaints come BACP, do they
 18 come in paper form or do they come in electronic format?
 19 **A. Electronic.**
 20 Q. And then where are they stored?
 21 **A. Everything prior to December 2018 is stored in**
 22 **a database called CSR.**
 23 Q. And after December 2018?
 24 **A. Another database called Salesforce.**

1 Q. And when you generated this report, is it a
 2 separate software program that you have to use?
 3 **A. Yes.**
 4 Q. And what is the name of that?
 5 **A. Business Objects.**
 6 Q. And it lets you pull out all the complaints
 7 related to a particular type note of complaint?
 8 **A. Yes.**
 9 Q. The complaint category in the exhibit, which
 10 is the fourth titled column; do you see that?
 11 **A. Yes.**
 12 Q. And you had testified in your examination that
 13 you put those -- you filled in that column. Do you
 14 remember that testimony?
 15 **A. Yes.**
 16 Q. And you filled those -- you filled that column
 17 in based on what you read in the description; is that
 18 correct?
 19 **A. Yes.**
 20 Q. You had testified that -- Counsel was asking
 21 you in relation to your paragraph 4, he had asked you
 22 what the difference between excessive noise and
 23 neighborhood disturbances were. Do you remember that?
 24 **A. Yes.**

1 Q. If I could have you turn to the page that has
 2 entries -- that has the February 28th entry.
 3 **A. Okay.**
 4 Q. But the entry I'd actually like to direct you
 5 to is the one after that, the date field is -- the
 6 address is 1726 North Sedgewick. Do you see that?
 7 **A. Oh, is it 2008? Okay. Is it the --**
 8 Q. It's on the page with the entry marked
 9 February 28th, 2018. It's on that page.
 10 **A. Okay.**
 11 Q. But the entry I want you to look at is the
 12 last one on that page with the address of 1726 North
 13 Sedgewick Street.
 14 **A. I see it.**
 15 Q. Okay. If you look in the description, the
 16 description in part reads with 16 to 100 people
 17 occupying a studio apartment appropriate for 1 to 3
 18 people and traffic jams happening along Sedgewick at
 19 2:00 a.m., with drive-by revelers.
 20 Would a traffic jam with drive-by revelers at
 21 2:00 in the morning be an example of a neighborhood
 22 disturbance that's necessarily not excessive noise?
 23 **A. Yes.**
 24 Q. It continues saying: Unruly bachelor parties

FILED DATE: 1/17/2020 3:06 PM 2016CHI15489

1 with drunk revelers urinating from the rooftops onto our
 2 property.
 3 Would that particularly behavior constitute a
 4 neighborhood disturbance, which is not excessive noise?
 5 **A. Yes.**
 6 Q. Unruly other parties with attendees throwing
 7 apples at passers-by.
 8 Would throwing apples at passers-by constitute
 9 a neighborhood disturbance that is not excessive noise?
 10 **A. Yes.**
 11 Q. So it's true that there could be instances of
 12 neighborhood disturbances, which is not necessarily
 13 excessive noise; is that correct?
 14 **A. Yes.**
 15 Q. You had testified that between April 6th,
 16 2018, and August 2019, you estimated there were about
 17 250 shared housing complaints that came in. Do you
 18 recall that?
 19 **A. Yes.**
 20 Q. You were asked if you knew how many complaints
 21 came in during that same period of time on hotels. And
 22 you had said that you did not know. Do you remember
 23 that?
 24 **A. Yes.**

1 Q. But in any event, regardless of what it is,
 2 the fact remains that these are 311 calls about shared
 3 housing and vacation rentals that got forwarded to BACP;
 4 is that accurate?
 5 **A. Yes.**
 6 MR. RUBIN: That's all I have for right now.
 7 MR. HUEBERT: I'm done.
 8 MR. RUBIN: Okay. We'll reserve signature.
 9 THE COURT REPORTER: Did either of you need to
 10 order this?
 11 MR. HUEBERT: Yeah, we're going to order an
 12 expedited transcript.
 13 THE COURT REPORTER: How soon do you need it?
 14 MR. HUEBERT: As soon as possible. Can we get it
 15 in -- when is the shortest?
 16 THE COURT REPORTER: Today is Wednesday.
 17 MR. HUEBERT: Yeah.
 18 THE COURT REPORTER: Do you want to get it Friday?
 19 MR. HUEBERT: Yeah, I think that would be good.
 20 THE COURT REPORTER: Okay.
 21 (Witness excused.)
 22
 23
 24

1 Q. Do you have an estimate of how many would have
 2 come in for hotels to BACP for that time period?
 3 **A. I would say at least maybe 50.**
 4 Q. And in any instance, do you believe that it
 5 would be anywhere near 250?
 6 **A. No.**
 7 Q. If you go to the entry dated January 29th,
 8 2018. Counsel asked you about this entry as well.
 9 **A. Yes.**
 10 Q. And you see in the description kind of a in
 11 response to what is presumably the third question, it
 12 says bed and breakfast. Do you see that?
 13 **A. Yes.**
 14 Q. But if you look in the complaint category, it
 15 says unlicensed. Do you see that, too?
 16 **A. Yes.**
 17 Q. So if it's unlicensed, it's possible it wasn't
 18 being operated as a bed and breakfast at all, right?
 19 **A. Yes.**
 20 Q. In fact, in all the instances here where it
 21 says unlicensed, what the caller describes the business
 22 as isn't necessarily accurate as to what the business is
 23 being used as; is that right?
 24 **A. Yes.**

1 STATE OF ILLINOIS)
) SS.
 2 COUNTY OF COOK)
 3
 4 IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
 COUNTY DEPARTMENT, CHANCERY DIVISION
 5
 6 LEILA MENDEZ and ALONSO ZARAGOZA,)
)
 7 Plaintiffs,)
)
 8 vs.) No. 2016 CH 15489
)
 9 CITY OF CHICAGO, et al.,)
)
 10 Defendants.)
 11
 12 I, CHARLES LEE, state that I have read the
 13 foregoing transcript of the testimony given by me at my
 14 deposition on the 25th day of September, A.D., 2019, and
 15 that said transcript constitutes a true and correct
 16 record of the testimony given by me at the said
 17 deposition except as I have so indicated on the errata
 18 sheets provided herein.
 19 _____
 CHARLES LEE
 20
 21 No corrections (Please initial) _____
 22 Number of errata sheets submitted _____(pgs.)
 23 SUBSCRIBED AND SWORN to
 before me this _____ day
 of _____, 2019.
 24 _____
 NOTARY PUBLIC

FILED DATE: 1/17/2020 3:06 PM 2016CH15489

1 STATE OF ILLINOIS)
) SS.
 2 COUNTY OF COOK)
 3
 4 I, Terry M. Barfield, Certified Shorthand
 5 Reporter and Notary Public, do hereby certify that on
 6 the 25th day of September, 2019, the deposition of the
 7 witness, CHARLES LEE, called by the Plaintiffs, was
 8 taken before me, reported stenographically, and was
 9 thereafter reduced to typewriting under my direction.
 10 The said deposition was taken at the offices
 11 of the City of Chicago, Department of Law, 30 North
 12 LaSalle Street, Suite 1020, Chicago, Illinois, and there
 13 were present counsel as previously set forth.
 14 The said witness, CHARLES LEE, was first duly
 15 sworn to tell the truth, the whole truth, and nothing
 16 but the truth, and was then examined upon oral
 17 interrogatories.
 18 I further certify that the foregoing is a
 19 true, accurate, and complete record of the questions
 20 asked of and answers made by the said witness,
 21 CHARLES LEE, at the time and place hereinabove referred
 22 to.
 23
 24

1 The signature of the witness, CHARLES LEE, was
 2 reserved by agreement of counsel.
 3 The undersigned is not interested in the
 4 within case, nor of kin or counsel to any of the
 5 parties.
 6 Witness my official signature and seal as
 7 Notary Public for Cook County, Illinois, on this
 8 27th day of September, 2019.
 9
 10
 11
 12 *Terry M. Barfield*
 13 _____
 14 TERRY M. BARFIELD, CSR
 15
 16
 17
 18 CSR No. 084-004536
 19
 20
 21
 22
 23
 24

FILED DATE: 1/17/2020 3:06 PM 2016CH15489

Exhibits

Lee Exh 001 3:12 10:23 11:1

1

1 10:23 11:1 76:18 80:17**1,500** 72:24**10** 38:21 39:5,6**100** 73:14 80:16**11** 68:6**12th** 54:8,10**132** 32:22 68:19**1430** 54:17**14th** 54:12 57:6**1515** 67:3**15th** 58:19**16** 74:14,16 76:18 80:16**16th** 47:3 49:2,9 54:16 59:16 63:3**1726** 80:6,12**18th** 21:14 49:18,21 55:9,11,18**18tj** 71:3**19th** 54:17**1st** 51:21 52:16

2

2 54:16**200** 43:20**2000** 16:1**2008** 80:7**2016** 11:17 13:12 14:18 15:24 19:6
22:20 24:17 42:2 70:6 78:6**2017** 16:2 21:14 41:23 47:3,16,21
48:9 49:2,9,18 50:8 51:21 52:16 54:8
55:9,11 56:15 57:6 58:19 59:17 60:8,
15 61:9 62:11 63:3,12,18 71:3 73:3**2018** 11:18,24 14:13 16:18,24 17:4
42:2 44:15,19 64:3,12,15,20 65:8
78:7,21,23 80:9 81:16 82:8**2019** 14:19 15:13 16:24 51:10 81:16**20th** 47:16,21 48:9**21** 60:15**21st** 60:8**226** 43:24 44:11**23** 32:22**24/7** 35:20**250** 16:22 81:17 82:5**25th** 61:9 62:10**26** 43:23 65:7**27** 11:17 78:6**27th** 13:12 15:24 19:6 22:20 42:2
70:6**28th** 49:22,23 50:8 80:2,9**29th** 64:20 82:7**2:00** 80:19,21

3

3 11:14 17:6 73:20 78:4 80:17**30** 7:20 42:5 43:4,8**30th** 63:12,18**31** 5:15 7:21**311** 11:15 12:2,24 17:13 18:7 41:24
44:17,22 45:10,11,16 74:1,15,20
75:15 76:19 77:5,6,14 78:5,9,11 83:2**3rd** 64:3,12,15

4

4 19:3 30:15,23 31:2,17 79:21**40** 29:2**4331** 57:15**448** 67:12**449** 64:21**4837** 50:10**4928** 66:1**4th** 56:15

5

5 32:1 35:1,10 36:24 78:7**50** 28:23 82:3**5058** 54:11**52** 64:16**5th** 11:18 14:13 16:18 17:4 42:2
44:15,19

6

6168 64:12**624** 59:19,22**6250** 67:17**6th** 16:23 81:15

7

70 68:19**733** 59:17

9

933 57:9

A

a.m. 80:19**ability** 4:14,23**access** 75:2**accurate** 11:12 78:7,9 82:22 83:4**Accurint** 40:2**acting** 40:18**action** 43:11 52:18 53:2**actual** 18:23 40:1**add** 68:16**added** 18:21 21:21 25:17**addition** 56:18**additional** 18:21**address** 6:6,7,24 8:4 35:12 37:18
38:5,7,9,11 43:15 50:9,24 57:9,15
60:2,4,12 61:5 80:6,12**addresses** 40:3 44:3,8,10,11 60:20
62:5**advertisement** 26:24**advertising** 26:18,19 59:13**affidavit** 5:5 11:7,8,14,15 17:7 18:4,
23 30:14,23 31:17 32:1,19 35:1,10
36:24 39:13 45:13 53:12,15 70:5
73:19 75:11,14 77:17 78:3,4**agent** 18:2 77:21

agree 52:5
ahead 51:17 52:21
Airbnb 5:17 24:7,12,14 37:4,6,11
 38:7,8 49:10,14 55:14 56:6 67:8
 72:11
alderman 45:4,18
allegation 67:13
alleged 29:6,21 58:22 62:16
allegedly 32:20 66:21 71:14
alleges 53:19
allowed 9:20
alternative 24:12
and/or 15:1
answering 4:22
answers 4:14 17:19 22:13,17 75:9
apartment 80:17
apartments 67:19 68:7
apparent 46:6 63:8,15 64:9 67:5
apparently 61:10
appeared 16:18
appears 21:22 52:2 55:19 64:16
 65:2 70:20
apples 81:7,8
applicable 48:10,12 56:20 63:14
 64:8
apply 31:19
approximate 59:18 72:21
Approximately 42:5
April 11:18,24 14:13 16:18,23 17:4
 42:2 44:15,19 78:7 81:15
asks 74:21
assigned 17:21 26:1,12
association 52:4,10 53:11,12,16,
 18,20
association's 66:4,22
assume 4:21 32:24
assumes 46:18
attached 11:15 18:3 32:19 45:12
 70:5 77:16 78:4
attendees 81:6
attorney-client 12:21
attorney/client 12:19

August 14:17,19 15:12 16:24 51:10
 55:9,11,18 81:16
Avenue 50:10 54:11 57:10,16
 64:13,16 66:1 67:3
aware 38:24 41:1

B

bachelor 80:24
back 13:22 35:1 37:24 53:23 68:14
 69:24 73:22 75:5
BACP 17:8 25:19 26:3,7 27:4 28:1
 37:3 42:3,19 43:6,7 45:9 50:9,23
 52:18 60:22 66:8,19 74:1,4,13,17
 76:20,21 78:17 82:2 83:3
BACP's 30:7,11
ballpark 16:21,22 28:20 36:22
 38:19
based 13:19 17:21 22:1,5 56:21
 68:17,18 71:18 72:14,18 79:17
basically 17:23 62:7
basis 35:14 58:20
bed 35:17 42:1 43:9,15,21 44:15,18
 57:8,14 58:5 59:1,7 61:10,12,15,18,
 22,24 62:6,8,11,13,19 64:24 65:3
 67:13,18 82:12,18
beeps 63:5
beginning 16:2 70:8
behavior 32:21 34:2,5,8 81:3
Belmont 57:10
birth 6:24
bit 23:21 69:19
bites 57:8
blocking 23:11 46:5 70:13
body 57:8
boss 12:5
bottom 68:5
box 22:18 23:18 49:3
break 37:22 69:18,23
breakdown 13:4
breakfast 35:17 43:9,15 57:14 58:6
 59:2,7 61:11,12,15,19 62:12,13,20
 67:13 82:12,18
breakfasts 42:1 43:21 44:15,18
 61:22 62:1,6,8 64:24 65:3

broken 63:23
budget 15:20,21
bug 57:8
bugs 67:19
building 36:13,20 52:15,23 53:9,13
 63:5 66:9,23 68:11
buildings 31:22 43:1 52:14,24
 53:10,17 66:9,24 68:12
business 17:9 19:22 42:14 72:5
 79:5 82:21,22

C

cafe 19:23 42:15
call 5:19 17:8,13 18:7 22:5 23:23
 45:7 74:1,16,17 76:19 77:6,15
called 4:4 6:11 13:14 34:21 40:2
 52:13 78:22,24
caller 17:17 20:19,22 22:24 23:24
 25:22 73:24 74:19,21 75:23 76:22
 77:21 82:21
callers 29:7,19 30:6
calling 23:20 75:16
calls 5:9 7:14 12:18 18:4 41:24
 44:17 74:15,19 77:10 83:2
Capifali 12:5 15:18
capital 63:4
captain 56:17
captured 45:12 62:12,14
Carpenter 64:21 67:12
cars 56:19
case 11:9 12:14 16:6,15 31:15 32:12
 37:10 45:8 53:11,13
cases 77:21
categories 15:3 21:6 22:4 33:3,7,
 22 57:23 58:4 74:6,10,13,16 76:18
categorized 14:9 32:13
category 13:13,14,17 18:1 20:16,
 17,24 21:15,20,22 34:21 36:16 47:22
 48:11 63:7 74:2 76:12 79:9 82:14
caution 12:20
Central 57:16
cetera 63:22
chain 12:12

change 25:11,12
changed 22:7 25:13
characters 23:19
CHARLES 4:3
check 26:16,20,21 50:3
checked 42:7,10 50:9,23
Chicago 5:24 72:23
choice 56:7
choices 46:2 47:7,12
choose 13:11 19:13 20:20,24 22:3
chooses 20:22
choosing 61:17
chopped 63:13
chose 22:7 46:12
chosen 21:23 22:9 56:7 75:22
citation 27:18 28:9,14
citations 27:3
Cite 39:20
citizen 18:17 23:5 25:7 47:3,13
city 5:22,24 6:4,11,18,21 7:14,23
 8:2,16,23 9:7,15,21,22,23 10:2,10,17
 26:21 35:7 39:18,21,24 40:14 41:2,16
 42:1 43:19 44:18,22,24 45:7 50:3
 52:8,17 53:19 58:21 68:9 72:22 73:12
 78:1
City's 5:8
clarify 4:21 21:22 73:23
classify 77:6
clear 4:17 35:23 40:22 41:8 54:4
 65:19 67:23 68:3 75:15 76:6
close 69:20
closest 63:7
cockroach 59:18
code 5:22 6:11 9:21,23 52:17 76:11
codes 33:19 68:15
column 20:15 21:21 34:15 50:16
 75:13,17 76:8,9,11,12 79:10,13,16
comments 60:22
commercial 57:13
commissioner 15:15
company 7:3
compile 13:9

complain 20:5 44:22,24 45:4,15
complained 72:16
complainer 62:16
complaining 20:19 29:20 30:7
 31:8 32:9 41:24 44:17 45:17 49:19
 54:20 55:1,2,6 61:1 63:9 66:3 70:13,
 15 72:1
complains 31:6 32:7
complaint 13:5,7,8,14,16,21 14:10,
 13,22 17:14,15,19,22,24 18:12,19,23
 19:2,13,20 20:11,15,17,24 21:7,15,
 20,22,24 23:9 25:9,19,24 26:5,8,9,11
 27:13,14 28:2 33:23 34:1,2,5,24
 35:12 45:8 46:1,18 47:1,4,18 48:19
 50:3,22 52:1,6,16 54:10,12 55:12,15,
 19,20,22,23 56:22 59:20 61:14,18
 63:7,15,24 64:9,17,20,24 65:2,3,11,
 17 67:6,18 69:4 70:12 71:8,14 74:2
 75:16 76:12 77:2,8,15,24 79:7,9
 82:14
complaints 11:16 12:3 13:1,23
 14:5,21 15:10,23 16:4,14,17 17:2,7,
 11,12 18:4,5 19:11,15,23,24 20:3
 25:3 27:5,9,18,22 28:1,6,16 29:7,13
 30:2,10,15 32:3,18 33:13,14,15,18
 42:7,11,13,15,16,18,21 43:5,8,14
 44:2,9 45:20 46:1 50:2 51:9 54:7,16
 55:8 60:1 61:22,24 62:4,5 68:16,17,
 20 69:1,3 70:4 74:7,11 75:22 76:7,15
 77:16,18 78:5,10,11,17 79:6 81:17,20
complete 11:11
comply 37:12 59:2
concern 66:8,12,19,23
concerned 18:17 23:5 25:7 47:3,13
concerns 66:13
condition 21:3 33:23,24 34:4,7
 63:21,22
conditions 20:6,11 30:17
condo 52:4,10 53:1,11,16,17,20
 66:4,22
condominium 52:3
conduct 26:4
conducted 43:4,24
confirm 51:15 72:14
confirmed 50:17
confirming 50:20
connected 44:24
connection 11:8 26:4

constantly 63:6
constitute 81:3,8
Constonate 22:14
consumer 20:9 42:17
contact 25:22,23 26:7 28:1,8
contacts 74:1
contained 21:19
context 60:24 61:3
continues 80:24
corporation 7:2
correct 6:1,2,12,13,18,19 9:8 14:7
 34:19,20 35:8 40:15,16,24 41:11 48:7
 49:16 52:11,18,19 53:2,21 54:18
 55:24 56:11 61:15 62:18 63:9,10
 64:1,2,18,19 65:5,6 66:10,24 67:9,14
 68:12,13,20 69:1,14 70:10,11,16
 71:1,2,6,7,11,12,15,16,18 72:5,17,20
 74:17,18 77:3,4 79:18 81:13

correctly 14:3 19:12 47:12
couch 59:19
counsel 73:23 75:20 79:20 82:8
count 13:4
court 4:18 10:23 11:9 37:24 53:22
 67:17 70:1 83:9,13,16,18,20
cover 14:15
covered 70:8 73:23
create 14:4
created 13:15,18,19 22:12 64:6
Crowne 59:19 60:3
CSR 78:22
cure 58:23
CW 60:11,19,24

D

damage 34:6
dash 22:21 23:6,10 24:7,16,22
data 37:16 38:11,16 39:9,23 40:5
database 13:23,24 40:2 48:20,22
 78:22,24
date 6:24 14:15 15:24 16:24 18:17
 24:19,21 48:10 54:23 64:11 65:23
 80:5
dated 54:8 55:9 63:11,18 64:3 65:7
 82:7

dates 13:11 14:13 54:22,24 55:3
days 5:16 7:21
dealt 45:7
Dearborn 54:17
DEC 24:17
December 11:17 13:12 14:18 15:24
 19:6 22:20 42:2 70:6 78:6,21,23
decides 20:17
define 58:15
defined 66:5
department 15:16 17:21 42:22
departments 43:6
depending 19:19
depends 59:13
deposed 4:10
deposition 4:9 5:2 11:1 45:23
deputy 15:15
describe 17:11 26:14
describes 23:8 25:8 82:21
description 22:11,21 23:15 25:3
 46:4,7 47:16,22 49:3,8,17,19 50:1
 54:22 55:13 56:21 57:7,13,18 60:10,
 18,19 61:9,11 63:12,21 64:5 65:10,19
 67:5,18 75:10 77:7 79:17 80:15,16
 82:10
descriptions 22:5,11 49:15 77:14
designated 74:16 76:19 77:16
 78:10
designates 75:17
desk 59:19
details 18:24 22:1
determination 9:19 52:20 77:1,6
determine 17:14 40:21 50:11 77:10
difference 79:22
difficult 37:2
direct 22:6 80:4
directed 42:19
dirty 59:19 63:22
disclose 12:21
disclosure 12:19
discreet 28:13
discussed 75:14

display 38:8
disturbance 80:22 81:4,9
disturbances 30:17,24 31:4 79:23
 81:12
division 15:16 68:6
document 11:4
documents 5:1 66:4,22
downstairs 23:11,16 46:5,7 70:13,
 24
drive-by 80:19,20
driveway 64:6
drunk 81:1
duly 4:4
dwelling 5:14
dwellings 31:21

E

e-mail 6:7 12:15,18
e-mails 12:12
e.g 24:7,12 49:10 55:14 56:6 67:8
e.g. 49:14
earlier 42:12 45:23
early 15:12
East 67:17
elaborate 23:21,24 75:24
electronic 78:18,19
employee 45:7
encompassed 44:6,7
encompasses 36:3
end 55:15
enforcement 28:17 40:2 43:10
 52:18 53:2
engaged 53:19
engaging 52:2
enter 44:8
entered 44:11 45:10,11 76:14 77:20
entire 53:13 77:24 78:1
entities 57:24
entity 7:2,11
entries 80:2

entry 17:23 18:4,5 19:1,5,10 21:15
 22:20 23:18 47:21 49:9 50:8 51:21
 56:6,14 57:12 59:15,16 60:7,8,19
 61:8 63:3,18 64:3 65:7,18 66:1 67:2
 70:6 80:2,4,8,11 82:7,8
erroneous 37:17 38:16 39:8 40:5
essentially 18:2
estimate 16:21 28:20 36:22 82:1
estimated 81:16
event 83:1
examination 4:6 73:17 79:12
examined 4:5
Excel 14:1
exception 9:24
excessive 21:3,17 22:8 30:16 31:1,
 3,8 69:3,14 71:8,9,14 72:2,3 79:22
 80:22 81:4,9,13

excuse 61:22
excused 83:21
exhibit 10:23 11:1 19:4 75:10,14
 76:6 79:9
exit 23:11 46:6 70:14
expedited 83:12
explain 13:18 38:4
extent 12:17,22
exterior 34:6 38:9

F

fact 17:20 46:8,12 47:23 50:11 52:24
 66:9,21 68:8 69:6 74:2 82:20 83:2
facts 29:6,21
failure 34:9
fair 59:3,8 65:20
fall 19:16 20:7 42:14 57:22 74:7
falling 33:3,6
falls 48:23 49:11
familiar 39:9
families 47:24 55:21 56:16 57:4
family 63:13
February 21:14 49:18,21,22 50:8
 65:7 71:3 80:2,9
fences 63:23

fewer 5:16 7:21**field** 21:20 22:12 48:23 49:4,11 56:8
61:9 63:14 64:8 65:24 67:8 72:14
75:10 80:5**fields** 13:20 25:3 48:23 61:6**figure** 72:21**file** 26:11,21**filed** 20:11**files** 75:6**filled** 79:13,16**final** 9:19 52:20**find** 12:11 25:23 26:17 38:7 39:18
48:14,20 63:7 64:4**flex** 22:13**floor** 67:19 72:5**follow** 25:20**force** 28:15**forget** 20:8**form** 6:24 7:5 8:9 9:1,9 10:4,11,18
15:4 18:20 25:24 26:3 27:13 28:8
29:8,15,22 31:10 37:13 39:1 48:5
50:3,19,23 54:1 56:1 57:1 58:1 59:10
65:14 69:8,15 72:6 78:18**format** 78:18**forwarded** 12:12 74:17 83:3**found** 27:3 59:18 62:16**foundation** 72:6**fourth** 79:10**fraud** 20:9 42:17**free** 12:20 18:20 23:19**Friday** 83:18**front** 56:19**fully** 4:13,23

G

gas 63:5**gather** 69:19**general** 46:20**generally** 25:4 35:20 46:20 48:2**generate** 27:7,12,17,20,23 50:15
51:4**generated** 14:1,12 16:4,10,13,19
28:4 51:8,12 79:1**gist** 52:5**give** 4:14 64:4**good** 70:2 83:19**governing** 66:4,22**government** 8:4**grand** 34:15**guess** 18:16**guest** 23:4 25:7 32:4,21 33:8 34:2,5,
8,18 47:1,13 48:3 71:22**guests** 22:22 32:11 33:11,14 34:12
35:2 46:13,17 55:24 58:19 59:14 70:9
71:4**guests'** 35:4

H

halfway 21:11**hand** 10:22**handful** 28:13**happened** 27:4 40:9**happening** 40:23 41:11,13 80:18**hard** 72:10**hazard** 63:23**head** 74:23**heading** 18:24**health** 43:2**hear** 69:5**hearing** 72:1**high** 73:13**higher** 73:4**home** 6:24 8:4 32:3 40:3 48:1 56:17,
24 57:5,14 58:20**homeless** 65:12**homes** 31:22**honestly** 4:13**host** 6:15 31:23 32:10 35:11,16,24
37:1,2,7 38:13,14 39:20,21,22 40:6**host's** 6:6 31:23**hostel** 57:14**hosts** 6:15 35:3,8 36:3,16**hotel** 20:2,6,11 43:15 57:7,10 59:21
60:3 62:23 66:5**hotels** 19:16 35:20 42:1,8,10,13,22
43:9,19 44:14,18 45:16 60:1 62:8
74:7 81:21 82:2**house** 36:1,12 56:19**housing** 5:9,13,20,22 6:5,12,14,16,
17,20 7:3,10 8:7,15 9:6,7,14 10:1,3,
16,17 11:16 12:3 13:10,14,20 14:6,
10,21 15:1,7,11,23 16:5,14 17:3,16
18:13,14 19:2,10 20:3 21:8 24:7,11,
14 28:5 31:20 32:9 35:3,15,21 36:2,7
37:3,8 38:15 40:13,14,18 45:1,24
46:8 49:10,14 50:5,12,18 51:1,9
55:14 56:6 57:16 58:5,16 59:1,6 65:4
66:18 67:8,24 68:10 71:19,23 72:11,
22 74:11 75:21 76:15 77:2,17 78:5,10
81:17 83:3**housing/vacation** 74:3**Huebert** 4:7,8 10:22 11:3 19:5,8
37:21,23 38:3 39:12 54:4 56:10 60:14
69:18,24 70:2,3 73:15 83:7,11,14,17,
19

I

i.e. 63:22**ice** 64:7**ID** 8:5**identified** 42:12 74:6**identify** 39:21,22 40:5 41:2,17 47:8**identifying** 37:1 40:17 47:4 70:10
71:21,24**identities** 35:2**identity** 7:1 32:5 37:2,7**illegal** 8:8,17,24 9:8,13 10:1,8,15**illegally** 58:7 59:7**implemented** 13:15**inception** 14:18**incident** 18:18 24:19,20 54:24**incidents** 55:1,3**include** 18:4 28:6,11 51:5,10**included** 15:2,10,22 43:4 51:13
57:17 60:4**includes** 15:2 18:5,23 50:16 54:7
60:7**including** 14:5 54:16**incorrectly** 69:5**independent** 26:19

individual 7:4 15:17**individuals** 65:12**information** 6:3,20,22 8:1 12:21
18:21 25:23 27:4 28:7 35:5,7 51:5,10,
13 71:18 72:18 73:9 75:2**initial** 66:6**instance** 40:4 41:6,10 82:4**instances** 38:23 39:8 41:1,12,16,20
43:8 55:6 81:11 82:20**intake** 18:2**interest** 68:9**interior** 38:10**intermediary** 5:16 26:18 39:24**investigating** 72:19**investigation** 26:4,9**investigator** 26:2,12,14**involved** 30:3,11 40:20 52:15**issue** 27:3**issued** 28:15**issues** 30:7,11**item** 47:2,15 48:9 56:15 63:11**items** 34:8**Ivan** 12:5 15:18

J

Jacob 60:13**jam** 80:20**jams** 80:18**January** 47:3,16,21 48:9 49:2,9
64:3,12,15,20 82:7**Jason** 4:8**July** 41:23**June** 51:21 52:16 54:8,10,12,16,17**jurisdiction** 30:8,12

K

keeping 58:19**Kenneth** 50:10**killed** 59:18**kind** 26:17 40:5 45:12 57:17 58:20
82:10**knew** 81:20**knowledge** 29:9 40:22 41:6

L

labeled 19:6 20:15**lack** 29:8 72:6**landlord** 53:13,14**larger** 15:2**Late** 73:3**law** 29:21 30:4 37:12 40:2**lease** 52:9**leased** 66:5**leases** 36:1**leave** 19:24 42:16**lee** 4:3 11:1 73:19**left** 64:8**legal** 9:17**legally** 31:8**Lester** 66:1**lets** 79:6**letters** 63:4**liability** 7:3**license** 6:18 7:23 8:3,8,16,23 10:9,
17 19:22 26:22 32:15 40:14 42:14
58:6,9,20 68:19**licensed** 26:17 34:19 42:10 50:5,
12,20 51:2 57:21,23 58:16,24 62:6,13
65:4 66:18 68:11 73:12**licenses** 59:3,5,8**limited** 7:2 23:18**list** 11:19 12:2,24 13:12,18 14:12,15
15:10 16:14 18:3,22 19:13 21:11,23
22:3 28:5 32:19 33:7,18 34:8 45:20
46:2 47:7 52:8,13,14,16,24 53:10,17
66:9,24 68:12 70:4 77:24 78:13**listed** 5:16 25:3,20 28:17 33:14
47:2,15 49:18 50:10 59:14 65:18**listening** 77:15**listing** 9:8,14 11:15 26:18,20,23
38:7,8 40:1 67:11 68:5 76:7 78:4**lists** 5:23**Littering** 34:6**live** 36:13**living** 48:1,2 56:16,23 57:4**locate** 40:20**located** 42:10**location** 35:12 36:8 50:4**long** 46:15,16**long-short** 72:4**long-term** 70:24**longer** 56:23**looked** 39:5 40:11 42:7**Loop** 59:19**lot** 63:23 64:1,17**loudly** 63:5**lower** 72:5

M

made 11:19,21 12:8 15:9 17:12 26:8
27:14 28:2 29:7 52:20 56:6**Madison** 59:17**main** 27:2**maintain** 34:9 35:4**maintained** 17:8**maintains** 52:8**majority** 68:24**make** 4:16 11:23 12:1 14:24 15:14
22:4 43:13 45:8 46:23 47:11 53:7
58:10,14 68:3,4 74:1**makes** 67:12 77:5**making** 12:9 17:24 19:12 21:24
46:1,18 47:4 50:2 52:1 55:19 69:4
71:10,13 77:1**manager's** 35:19**manner** 28:17**map** 38:9**marked** 10:23 11:1 80:8**match** 22:7 60:12,20**matches** 26:20**matching** 39:23**matter** 9:22 72:4**means** 34:23 45:3,16 60:12,24 71:9**member** 25:22

memory 29:5 46:23**Menard** 64:16**mention** 20:8 32:23**mentioned** 39:9 43:3,9 45:17**meter** 63:5**minimum** 8:5 19:24 42:15**minute** 24:11**misspoken** 49:24**moment** 64:4 73:22**month** 17:4**months** 16:10**morning** 64:5 80:21**motel** 63:1**multiple** 18:19 22:9 44:8 55:2 56:16
57:4 63:13**multiunit** 31:22

N

name's 4:8**named** 11:9**names** 56:18**natural** 7:4,8,12,13**nature** 13:6 18:18 19:19 23:9 25:9
34:24**natures** 13:5,7**necessarily** 24:1 34:3 35:16 53:3,6
63:17 66:11 67:20 74:24 80:22 81:12
82:22**neighborhood** 30:16,24 31:3
79:23 80:21 81:4,9,12**neighbors** 63:23**nod** 4:16**noise** 21:4,17 22:8 30:16 31:1,3,6,7
69:3,5,14 71:9,14 72:2,3,13,16 79:22
80:22 81:4,9,13**nonetheless** 50:23**North** 50:10 54:11,17 57:15 64:12,
16,21 66:1 67:12 80:6,12**note** 60:11,19 79:7**noting** 60:23**November** 63:18**nuisance** 21:10,15 22:8**nuisances** 30:16**number** 17:2 26:22 39:7,10 68:16,
17 73:4,6,13**numbered** 60:14**numbers** 14:16,17,20,21 33:19
68:15

O

O5 24:17**Oakdale** 67:3**object** 12:17 54:1**objection** 7:5 8:9,18 9:1,9 10:4,11,
18 15:4 29:8,15,22 31:10 37:13 39:1
48:5 51:16 56:1,9 57:1 58:1,11 59:10
65:14 69:8,15 72:6**Objects** 79:5**obtain** 6:18 35:7 73:9**obtaining** 8:23**occasion** 16:3**occupancy** 5:15 7:20**occupants** 55:20**occupying** 80:17**occur** 24:20 62:5**October** 63:3,12**offending** 32:4**offhand** 38:18 41:4 57:11 58:21**office** 75:5**officer** 53:11**officials** 45:18**one-inch** 59:18**one-to-one** 22:6**online** 26:17,23 40:1**operate** 10:1**operated** 82:18**operates** 6:15 9:22**operating** 19:22 42:14 57:16 58:7
62:11 67:13 68:9**operator** 6:12,14,17,21 7:3,11 8:8,
16 10:17 17:13 23:20,23 40:14,19,21
41:2,17 74:21 75:15,18 76:19,23
77:1,5,15**operator's** 24:1**option** 21:13,16**option's** 45:19**options** 18:19 20:22,24 22:9 28:13
56:13**order** 83:10,11**ordinance** 26:23 31:19 58:15**ordinary** 17:9**out-of-town** 32:4 35:2**outcome** 28:13**owner** 32:10,14,20 33:1,4,8 34:1,17
35:17,24 37:8**owner's** 34:9,18 35:18**owner-occupied** 35:18**owners** 33:11,15 34:12 36:16**owns** 53:13

P

pages 60:14**paid** 19:24 42:15**paper** 78:18**paragraph** 11:14 17:6 30:15,23
31:2,17 32:1 35:1,10 36:24 73:20
78:4 79:21**parenthesis** 60:11 63:6**Park** 57:16 67:17**parked** 56:19**part** 12:18 18:6,16 22:6 36:11 65:17
77:19 80:16**parties** 32:4 80:24 81:6**passers-by** 81:7,8**pattern** 25:4**pending** 9:19 56:9**people** 6:4 23:11,16 40:12 44:21,23
46:5,7 55:2,22 56:17,23 70:13,23
71:13 80:16,18**percent** 28:23 29:2 38:21 39:5,6**percentage** 28:16 32:18 36:15
38:19 39:10**period** 5:15 7:20 16:23 25:12 81:21
82:2**periodically** 14:16**permitted** 52:9

person 7:4,8,12,13,22 8:1 18:7
19:12 21:23 23:24 24:2 27:13 28:1,8
31:8 32:7 46:1,18 47:4 50:2 52:1
54:20 55:1,6,19 63:8 66:3 69:4,12
70:10,12 71:6,21 75:16

personal 29:9 40:22 41:5

personally 38:23

pertain 34:8

pertains 47:18

photos 38:10

phrase 49:13

Pick 18:18

place 36:6 55:23

places 52:8

plants 35:16

platform 5:20,23 6:3 26:19 37:6

platforms 37:3

Plaza 59:19 60:3

PLS 60:11

point 50:23 72:24

policy 9:22

poor 63:22

porch 23:11 46:5 70:14

portion 5:14 7:20

position 53:18

possibilities 36:14

posted 40:1

potential 61:4

potentially 69:13

precedes 33:18

preceding 49:2 55:18

precinct 56:17

precisely 13:2

prepare 5:1

pretty 59:20

primary 6:7 31:24

prior 78:21

privilege 12:19,21

problem 58:24

process 17:11 26:14 43:13 62:7

produce 13:3 14:1 44:8

program 13:24 79:2

prohibit 53:1

prohibited 32:16 52:14,24 53:6,9,
17 66:9,24 68:11

prompt 24:13

prompted 17:18

prompts 25:5

proper 59:8

properly 34:9

properties 5:24 44:6,8

property 21:3,4 22:22 23:5 30:18
32:8 33:23,24 34:4,7,9 35:11,17,24
36:3,17,18 37:1 44:5 46:13,14 47:2,
13 50:11,24 54:11,13 63:22 65:12,20
68:18 70:9 71:5,22 81:2

provide 6:4,21 8:2 12:2 23:19 37:7

provided 37:3,17 39:23,24 55:7

public 20:1

pull 79:6

purposes 15:20 16:6,15 57:21

put 20:17 21:20 22:14,15,17 61:5
72:12 76:23 79:13

puts 22:15

Q

question 4:19,22 7:5 8:9,12 9:1,9
10:4,11,18 15:4 22:24 23:2,7,22 29:8,
15,22 31:7,10 37:13,18 38:1,5 39:1
48:5,13,20 50:4,24 53:23 54:2 56:1,9
57:1 58:1 59:10 65:14 66:17 69:8,15
72:7 82:11

questions 4:12,15 17:18 18:1,8,11
22:13,17 25:16 73:16 74:20,24 75:6,
9,20

R

ran 43:14 44:2

range 14:15

Ravenswood 54:11 64:13

reached 9:20

read 12:14 37:24 38:2 46:4 47:16
49:18 53:23,24 67:5 79:17

Reading 65:10

reads 80:16

ready 37:23

reason 66:14,15 71:17

reasons 45:8

recall 16:20 21:2 41:6,7,16,20 48:8,
13 60:2 75:19 76:2 81:18

receive 8:2 17:13 44:18 77:9

received 11:17 42:1,3 57:8 78:6

receives 25:19 45:9

recent 16:18 28:4 51:8

recognize 11:4

recollection 45:23

record 17:19 38:2 53:24 68:4 69:24

records 17:12 55:5

reference 55:14

referenced 14:5,9

referring 12:18 39:12 67:24

refers 6:11 48:15 70:24

reflect 23:24

refresh 46:23

register 5:23 7:9 9:20 37:8

registered 9:6,15 10:2 26:17 43:16
50:4,11,20 51:1 58:17 62:4 66:18
68:10 72:22

registers 6:4

registration 9:18 26:22 38:6,11,13

registrations 38:16

regularly 37:2

regulates 7:14

regulation 5:9

relate 30:16 32:3 34:5

related 11:16 12:14 16:15 17:3
42:16,21 61:21 78:5 79:7

relation 79:21

relief 53:18

remains 83:2

remember 12:15 13:2 16:9 24:9
41:4,9,10,12,13 74:8 75:23 76:1,3,4
79:14,23 81:22

remembering 41:14 47:11

Renew 8:18

rent 7:10 10:9,16 40:12 68:7

rental 7:18,22 8:2,23 10:9 12:3
13:10,15,21 14:22 15:23 19:2,10 20:3
21:4,9 22:22 23:4 28:6 31:20 36:7,17
41:3,18 45:1,24 46:9,13,14 47:2,13
49:20 50:5,13,18 51:2,9 53:1 58:5,16
59:1,6 65:5 66:19 68:10 69:6,7,13
70:9 71:5,6,22 72:3,4 74:3,11 75:22
76:15 77:2,17 78:11

rentals 5:10 7:15 11:17 14:6,10
15:1,8,11 16:5,15 17:3,16 18:15 32:3,
8 35:4,15,21 36:3,16 47:18 52:3,9
53:20 56:22 63:9,16 64:1,10,18
65:11,20 67:6,20,22 68:1 73:11 78:6
83:3

rented 7:19 36:9 57:20

renter 35:21 70:15

renters 71:1,15

renting 6:5 8:14,22 9:5 23:11,16
32:15 35:22 36:11,12 46:5,7,8 59:8
68:18 70:13,23

rents 7:22 8:6 36:2,6

repeat 8:12 33:12

report 13:19,21,24 14:16,17,20,24
15:2,9,14,22,24 16:4,18 22:10,16
44:2 45:12 79:1

reporter 4:18 10:23 37:24 53:22
70:1 83:9,13,16,18,20

reporting 15:21 24:20

reports 14:1 15:21

request 35:8

requested 11:2 38:2 53:24

require 44:4

required 4:13 6:3,17,21 18:8 35:4
37:7,8,9 40:13

requirement 59:2

requires 5:23 26:23

reserve 83:8

residence 6:8 31:24 55:22

residential 7:19 57:14

residents 68:7

residing 55:21,23

respondent 60:20 61:2

respondent's 60:11

responding 23:3

response 22:23 23:7,13,17 24:8,
18,24 72:11 82:11

responses 24:13 25:5

responsibility 34:18

restaurant 43:2

restrictions 52:10

restroom 37:20

result 27:8 52:17

resulted 24:14 27:12,18 28:17
43:10

results 43:4

resume 37:23

retail 72:4

return 50:3,22

returned 26:1,3 27:13 28:8 50:19

revelers 80:19,20 81:1

review 5:1,4,6 22:1

rooftops 81:1

room 59:18

rooms 59:22

RUBIN 7:5 8:9,18 9:1,9 10:4,11,18
12:17 15:4 19:3,7 29:8,15,22 31:10
37:13,19 39:1,11 48:5 51:16 53:22
54:1 56:1,9 57:1 58:1,11 59:10 60:13
65:14 69:8,15,22 72:6 73:16,18 83:6,
8

rules 21:4 30:17 31:18,19,24 32:14,
23,24 52:4,10 53:1,20 68:17

Rulings 68:21

run 44:14 61:21,24 62:3,19,22

Running 61:10

S

Salesforce 78:24

search 38:12,13 43:3,14 44:4,5,7,12
60:1,5 61:21,24 62:3,12,14,16,19,22

searches 44:1,14

searching 62:4

Sedgewick 80:6,13,18

select 17:15,24 18:19 46:2

selected 17:19,20,22 21:18,24
34:23 74:4

selecting 77:23

selection 67:7

selects 77:22

send 12:24 25:24

sense 57:22 58:10,14 73:6

separate 79:2

September 56:15 57:6 58:19 59:16
60:8,15 61:9 62:10

series 4:12 17:17 18:8 54:15 74:20

set 74:20

sewer 64:7

shared 5:9,12,19,22 6:5,12,14,16,
17,20 7:3,10 8:6,7,14,15 9:5,6,14
10:1,3,16,17 11:16 12:2 13:10,14,20
14:6,9,21,24 15:7,11,23 16:4,14 17:3,
15 18:13,14 19:1,10 20:3 21:8 24:7,
11,14 28:5 31:20 32:9 35:3,15,21
36:2,7 37:3,8 38:15 40:13,14,18 45:1,
24 46:8 49:10,14 50:5,12,17,21 51:1,
9 55:14 56:5 57:16 58:5,15,24 59:6
64:6 65:4 66:18 67:8,24 68:9 71:19,
23 72:11,22 74:3,11 75:21 76:15
77:2,17 78:5,10 81:17 83:2

sharing 32:3

sheet 64:7

Shore 67:17

short 37:22 46:14,17 69:23

short-term 36:15 47:18 49:20 52:3,
9 53:1,19 55:16,24 56:22 58:20 63:9,
16 64:1,10,18 65:11,19 67:6,20,22
69:6,7,13 70:15 71:1,6,15 72:3

shortest 83:15

shorthand 22:8

show 27:16 55:5

showed 27:8,12,17,21,24

shown 38:8

sick 19:24 42:15

side 34:14 56:19 63:5 72:12

sidewalk 19:23 42:15

signature 83:8

signed 74:4

single 44:11 63:12

single-family 31:22 48:1 55:21
56:16,24 57:4

site 5:24

situation 20:20

slash 17:16 19:2,10 20:1 45:24

slight 25:14
slotted 77:10
software 14:4 79:2
somebody's 67:19
someone's 23:20
something's 57:20
sort 22:4 38:16 39:9
sounds 4:17 59:22 63:24
source 72:13,14,15
specific 13:4,6,7,8 20:2 21:8 23:21
 28:12,14 41:10,12 44:14 45:18 49:20
specifically 14:24 15:7 30:14
 31:19 32:2 43:1 60:2
specifics 41:14
spreadsheet 14:5 20:15 22:12
 25:20 27:8,17,21,24 31:14 33:19
 34:14 50:16 51:5,8,12,20 68:14
spreadsheets 28:5
spurring 64:6
staff 25:22 35:20 45:9 60:22
start 13:11 27:22 53:7
starts 13:15 71:4
stated 52:19 56:17
statement 35:14 78:7
states 11:14
status 9:18
stay 36:17,18 46:16
stayed 57:7
staying 20:6 22:22 23:4 46:13 47:1,
 13 70:9 71:5,6,22
step 73:22
sticking 24:10
stop 37:19
stored 78:20,21
Street 54:17 59:17 64:21 67:12 68:6
 80:13
studio 80:17
stuff 23:12 46:6 70:14
submit 53:12,15
submitted 11:8
successfully 26:7

suggests 55:15
summary 24:2
Summer 41:23
supposed 61:10 65:13
supposedly 32:10
supposing 58:18
sworn 4:1,5
system 38:11,13 77:7

T

takes 18:7
taking 4:8
talked 28:7
talking 5:8 33:21 37:4 48:1,3 50:8
talks 47:24 56:16
telling 12:6 71:24 76:22
ten 17:18
tenant 48:3 55:16
tenants 46:16
term 46:15,16,17 56:23 62:19,22
 63:1 66:6 72:4
terminology 46:19,21
testified 4:5 79:12,20 81:15
testifying 76:1
testimony 75:20 79:14
text 23:19
the-next-to-last 59:16
thing 25:6,7 31:4 46:24 49:3 54:21
 77:19
things 27:2 28:11 29:19 30:3,6 33:3,
 6 36:4 42:16 45:17 57:13 58:7,8,9,10
 73:23
thoughts 69:19
throwing 81:6,8
time 12:8 15:9 16:11 25:11,12 49:13
 73:2 81:21 82:2
timeframe 39:11,12 78:15
times 40:9
titled 79:10
today 4:9 5:2,8 83:16
top 11:9 33:22 54:8 60:7,15 65:24
 74:23

total 20:23 34:15 68:19 74:14
traffic 80:18,20
training 77:9
transcribed 17:8
transcript 4:17 83:12
transient 5:15 7:19 66:5
trash 63:23
trouble 40:17
true 29:7,21 49:13 57:22 58:22 69:12
 81:11
truth 71:24
truthful 29:14
turn 33:17 56:14 80:1
turning 45:20 54:7 65:23 68:14
 70:4,5
turns 49:14
type 13:8 14:11,13 17:15,19,21
 18:12,24 19:9,12,15,18 20:2,7 21:7
 46:1,12 61:17,18 65:18 67:7 75:13,
 17,21,22 76:8,14,23 77:6,8,10 79:7
types 13:21 14:22,23 42:12,18,21
 59:3 77:24

U

unable 28:1 41:2,17
unacceptable 20:7
under- 67:23
understand 4:19,20,22 19:11
 22:19 43:13
understanding 5:12 7:17 14:3
understood 16:5
unit 5:13,14 6:12,14,17 7:3,10,19
 8:7,16 9:6,7,14 10:2,3,17 15:23 26:16
 32:9 35:21,22 36:7,13,19 37:8 38:15
 40:13,14,18 45:1 46:8 50:5,12,18
 51:1 52:3 57:17 58:5,16 59:1,6 64:5
 65:4 66:17,18 68:10 69:7
units 5:9,22 6:5,16 8:7,15 10:16
 14:6 15:1,11 16:5,14 17:3 18:14
 31:20,21,23 35:3,16 53:14 63:13 66:4
 67:24 72:22
unknown 32:5 34:21 35:2
unlawful 61:15
unlicensed 21:4 34:16 57:24
 62:11,15 64:24 65:3 66:15 68:21

82:15,17,21

unlike 35:17**unregistered** 66:15**Unruly** 80:24 81:6**urinating** 81:1

V

vacant 63:23 64:1,17**vacation** 5:10 7:14,17,22 8:2,22
10:9 11:16 12:3 13:10,14,20 14:6,10,
22 15:1,7,11,23 16:5,15 17:3,16
18:14 19:2,10 20:3 21:9 28:6 31:20
32:3,8 35:3,15,20 36:2,7 41:2,17
45:1,24 46:9 50:5,12,18,21 51:2,9
58:5,16 59:1,6 65:5 66:19 67:24
68:10 73:11 74:11 75:21 76:15 77:2,
17 78:6,11 83:3**valet** 20:1 42:16**variation** 25:15**varies** 18:12**vehicle** 20:1 42:16**verbatim** 24:1**verification** 7:1**verified** 51:6**verify** 38:6 70:21**version** 27:7,12,17,20,23**versus** 71:17**vicinity** 73:1**victim** 69:13**violation** 31:24 32:14,23 52:3,17
53:20 68:21**violations** 21:4 27:2 29:20 30:3,17
31:18 33:1,4,7,11 43:1 61:21,23
68:17**violator** 61:4

W

wage 19:24 42:15**wait** 53:5**wanted** 20:5**water** 64:6**ways** 44:21,23 45:15**Web** 17:23 18:4,5 23:18 73:24 77:20**website** 5:16,17 18:2 26:19 44:23
77:20**Wednesday** 83:16**West** 57:9 59:17,19 67:3 68:6**woke** 64:5**word** 61:10**words** 47:24**wrong** 32:10,11,14,20**wrote** 22:10

Y

yes-or-no 4:15

Z

zip 33:19 68:15 76:11

Exhibit V

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

LEILA MENDEZ and ALONSO ZARAGOZA,)	
)	
)	
Plaintiffs,)	
)	
)	
v.)	Case No. 16 CH 15489
)	
CITY OF CHICAGO, a municipal corporation;)	Hon. Sanjay T. Tailor
And ROSA ESCARENO, in her official)	
capacity as Commissioner of the City of)	
Chicago Department of Business Affairs and)	
Consumer Protection,)	
)	
Defendants.)	

**CITY OF CHICAGO’S RESPONSE TO PLAINTIFFS’ SECOND
SET OF INTERROGATORIES**

Defendant City of Chicago (“City”) responds to Plaintiffs’ Second Set of Interrogatories as follows:

INTERROGATORY NO. 26

Identify each and every fact the City will rely on to show that the stated purpose of the Amendment’s 2% surcharge — "to fund housing and related supportive services for victims of domestic violence," Chi. Muni. Code 3-24-030(C) — bears a reasonable relationship to the object of the Ordinance.

Response: The City objects to this Interrogatory on the grounds that it is vague and lacks foundation. Subject to and without waiving these objections, the City states that the surcharge’s stated purpose is the same as the object of the Ordinance and therefore, by definition, bears a reasonable relationship to it.

INTERROGATORY NO. 27

Identify each and every object of the Amendment’s 2% surcharge.

Response: The purpose of the surcharge is to fund housing and related supportive services for victims of domestic violence.

INTERROGATORY NO. 28

Identify any and all public policies that the City alleges support the Amendment's 2% surcharge.

Response: One public policy consideration supporting the surcharge is caring for victims of domestic violence. Survivors and victims of domestic violence often report that lack of safe and affordable housing is one of the primary barriers they face in choosing to leave an abusive partner. Studies indicate that house sharing has a tendency to reduce the availability of affordable housing, thereby contributing to the problem of domestic abuse victims lacking affordable housing. Each housing unit that is used for short-term house sharing rentals is a unit that it not available for use as permanent or transitional housing for victims of domestic violence. This also negatively impacts the housing available to the City and non-profit organizations seeking to shelter victims of domestic violence.

Another related policy consideration is to reduce the number of homeless people in Chicago. Domestic violence is seen as a predictive factor of homelessness. Studies indicate that domestic violence significantly contributes to homelessness due to lack of available and affordable housing for those seeking to escape a domestic abuse situation. A related policy consideration is to comply with HUD's federal mandate to prioritize domestic violence victims when addressing issues of homelessness. Compliance with that mandate is necessary in order to secure access

to the limited federal resources provided to combat homelessness. Investigation continues. The City will supplement this Response as appropriate.

INTERROGATORY NO. 29

Identify the "related supportive services for victims of domestic violence" the City funds, has funded, plans to fund, or may fund with revenue from the Amendment's 2% surcharge.

Response: The surcharge will enable the City to maintain existing shelter beds, fund additional shelter beds, and build a new shelter for victims of domestic violence. Additionally, the City currently supports approximately 30 different programs through various partner organizations who offer services to survivors of domestic violence. Some of these services include a 24/7 domestic violence hotline, immediate crisis counseling, safety planning, explanation of victim rights under the Illinois Domestic Violence Act, emotional support and guidance, crisis intervention, shelter placement, legal advocacy, linking survivors to medical and health services, child care, job training and housing options. Investigation continues. The City will supplement this Response as appropriate.

INTERROGATORY NO. 30

Identify each person who provided information needed to respond to any interrogatory or request herein, including which interrogatory (by number) was addressed by each such person respectively.

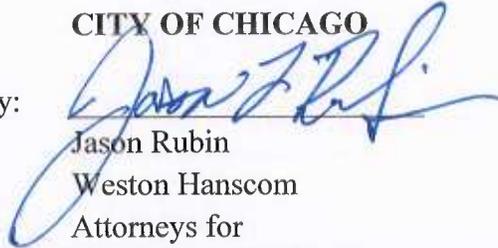
Response: Stefan Schaffer-City of Chicago Chief Resilience Officer, Christopher Wheat-Asst. to the Mayor, Anne Sheahan-Assistant to the Mayor, Robin Ficke-Research Director for World Business Chicago and Maura McCauley-Director of Homeless Prevention, Policy and Planning for the Chicago Department of Family

and Support Services all either provided or confirmed the accuracy of information used in answering Interrogatories Number 28 and 29.

Respectfully submitted,

CITY OF CHICAGO

By:



Jason Rubin
Weston Hanscom
Attorneys for
Defendants

Weston Hanscom
Deputy Corporation Counsel
City of Chicago Law Department
Revenue Litigation Division
30 N. LaSalle, Suite 1020
Chicago, IL 60602
(312) 744-9077

Jason Rubin
Senior Counsel
City of Chicago Law Department
Revenue Litigation Division
30 N. LaSalle, Suite 1020
Chicago, IL 60602
(312) 744-4174

CERTIFICATION

On this day, November 7, 2018, under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the answers to Interrogatories as set forth in this document are true and correct to the best of his knowledge, information and belief.

A handwritten signature in black ink, appearing to be 'SS', is written over a horizontal line.

Stefan Schaffer

Chief Resilience Officer for City of Chicago

CERTIFICATE OF SERVICE

I, Jason Rubin, an attorney, hereby certify that on November 7, 2018, I caused the foregoing City of Chicago's Response to Plaintiffs' Second Set of Interrogatories to be served on:

Jeffrey Schwab
Liberty Justice Center
Cook County No. 49098
190 S. LaSalle Street, Suite 1500
Chicago, Illinois 60603
jschwab@libertyjusticecenter.org

via messenger delivery and electronic mail; and on

Jacob Huebert
Christina Sandefur
Timothy Sandefur
Goldwater Institute
jhuebert@goldwaterinstitute.org
csandefur@goldwaterinstitute.org
tsandefur@goldwaterinstitute.org

via electronic mail.

A handwritten signature in blue ink, appearing to read "Jason Rubin", is written over a horizontal line.