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IRIS Y. MARTINEZ
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2021CH03558

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Chancery Division Civil Cover Sheet
General Chancery Section

(12/01/20) CCCH 0623

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

THE JOINT CIVIC COMMITTEE OF ITALIAN AMERICANS
Plaintiff
v.
THE CHICAGO PARK DISTRICT, ET AL.
Defendant

Case No: 2021 CH 03558

CHANCERY DIVISION CIVIL COVER SHEET
GENERAL CHANCERY SECTION

A Chancery Division Civil Cover Sheet - General Chancery Section shall be filed with the initial complaint in all actions filed in the General Chancery Section of Chancery Division. The information contained herein is for administrative purposes only. Please check the box in front of the appropriate category which best characterizes your action being filed.

Only one (1) case type may be checked with this cover sheet.

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| 0005 <input type="checkbox"/> Administrative Review | 0017 <input type="checkbox"/> Mandamus |
| 0001 <input type="checkbox"/> Class Action | 0018 <input type="checkbox"/> Ne Exeat |
| 0002 <input type="checkbox"/> Declaratory Judgment | 0019 <input type="checkbox"/> Partition |
| 0004 <input type="checkbox"/> Injunction | 0020 <input type="checkbox"/> Quiet Title |
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| 0007 <input type="checkbox"/> General Chancery | 0022 <input type="checkbox"/> Redemption Rights |
| 0010 <input type="checkbox"/> Accounting | 0023 <input type="checkbox"/> Reformation of a Contract |
| 0011 <input type="checkbox"/> Arbitration | 0024 <input type="checkbox"/> Rescission of a Contract |
| 0012 <input type="checkbox"/> Certiorari | 0025 <input checked="" type="checkbox"/> Specific Performance |
| 0013 <input type="checkbox"/> Dissolution of Corporation | 0026 <input type="checkbox"/> Trust Construction |
| 0014 <input type="checkbox"/> Dissolution of Partnership | 0050 <input type="checkbox"/> Internet Take Down Action (Compromising Images) |
| 0015 <input type="checkbox"/> Equitable Lien | |
| 0016 <input type="checkbox"/> Interpleader | <input type="checkbox"/> Other (specify) _____ |

☒ Atty. No.: 80095 ☐ Pro Se 99500

Atty Name: BEERMANN, LLP - Enrico J. Mirabelli

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Pro Se Only: ☐ I have read and agree to the terms of the Clerk's Clerk's Office Electronic Notice Policy and choose to opt in to electronic notice from the Clerk's office for this case at this email address:

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Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois
cookcountyclerkofcourt.org

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

THE JOINT CIVIC COMMITTEE)
OF ITALIAN AMERICANS,)
Plaintiff,)

v.) No. 2021 CH 03558

THE CHICAGO PARK DISTRICT (A Body Politic),)
MICHAEL P. KELLY (General Superintendent and)
CEO), AVIS LAVELLE (President), TIM KING (Vice)
President), and DONALD J. EDWARD, DAVID A.)
HELFAND, MARTIN L. KOLDYKE, JOSE M.)
MUNOZ, and ASHLEY H. NETZKY,)
(Members of the Board of Commissioners).)
Defendants,)

and)

LORI E. LIGHTFOOT (Mayor of the City of Chicago),)
and THE CITY OF CHICAGO (A Body Politic), as)
Respondents in Discovery.)

COMPLAINT FOR SPECIFIC PERFORMANCE AND OTHER RELIEF

NOW COMES the Plaintiff, THE JOINT CIVIC COMMITTEE OF ITALIAN AMERICANS (hereinafter the “JCCIA”), by and through its attorneys, ENRICO J. MIRABELLI, Esq., FRANK A. SOMMARIO, Esq., DION U. DAVI, Esq., and ANTHONY J. ONESTO, Esq., and complains against the Defendants, THE CHICAGO PARK DISTRICT (hereinafter the “District”), MICHAEL P. KELLY (in his capacity as the General Superintendent and CEO); and AVIS LAVELLE, TIM KING, DONALD J. EDWARD, DAVID A. HELFAND, MARTIN L. KOLDYKE, JOSE M. MUNOZ and ASHLEY H. NETZKY (in their capacities as Members of the Board of Commissioners) for specific performance, and pursuant to Section 5/2-402 of the Code of Civil Procedure of Illinois, does name LORI E. LIGHTFOOT (Mayor of the City of Chicago) and THE CITY OF CHICAGO as Respondents in Discovery. In support of said complaint and request, The JCCIA respectfully states as follows:

JURISDICTION

1. That the Joint Civic Committee of Italian Americans (“JCCIA”) is an Illinois charitable corporation in good standing with the State of Illinois and has its principle place of business in Cook County.

2. That the JCCIA is the successor in interest to the Columbus Statue Committee, as more fully set forth herein below.

3. That the Chicago Park District (“District”) is a body politic and an independent municipality that, pursuant to legislation passed by the Illinois General Assembly in 1933, became the singular body governing the then existing twenty-two (22), and current existing, park districts in the City of Chicago, County of Cook.

4. That Michael P. Kelly (in his capacity as General Superintendent and CEO), Avis LaVelle (in her capacity as President), Tim King (in his capacity as Vice President), and Donald J. Edward, David A. Helfand, Martin L. Koldyke, Jose M. Munoz, and Ashley H. Netzký (in their respective capacities as Members of the Board of Commissioners) are all members of the Chicago Park District Board and are agents of the Chicago Park District.

5. That Lori E. Lightfoot is currently serving as the elected Mayor of the City of Chicago since becoming duly elected on April 2, 2019.

6. That the City of Chicago is a body politic that was formally incorporated as a city on March 4, 1837.

7. That this Court has subject matter and personal jurisdiction over the issues contained herein and the parties, and venue is proper because the contract at issue was executed in, and concerns property located in, Cook County, Illinois.

RELEVANT FACTUAL BACKGROUND

8. That the JCCIA was established in 1952 and acts as the “umbrella organization” of over fifty (50) Italian civic, social, and athletic organizations in the City of Chicago.

9. That the Columbus Statue (hereinafter “Statue”) was first commissioned by Henry J. Furber, the owner of the Columbus Memorial Building, which was constructed prior to the commencement of the Columbian World’s Fair held in Chicago in 1892-93. The Statue adorned the entrance to the Columbus Memorial Building for over sixty (60) years.

10. That in 1958, when the Columbus Memorial Building was to be demolished, the owners of the building offered to donate the Statue and two (2) mosaic murals to the District in a letter written on June 26, 1958. A true and correct copy of the letter and the history of the Statue and building are attached hereto and incorporated herein as **Exhibit “A”**.

11. That on July 24, 1958, the District held a meeting in which it decided it “will take no initiative to acquire these works.” A true and correct copy of the pertinent part of the minutes of the meeting are attached hereto and incorporated herein as **Exhibit “B”**.

12. That in 1966, the Chairman of the City of Chicago, Department of Urban Renewal contacted Mr. Arthur L. Schultz of the District to inform him of plans to construct a Columbus Plaza. A true and correct copy of the letter and plaza plans are attached hereto and incorporated herein as **Exhibit “C”**.

13. That in May of 1966, the plans for Columbus Plaza were moving forward, and the City offered to sell two parcels of land to accommodate the Plaza and acknowledged it was working in conjunction with the Columbus Statue Committee with an anticipated completion of the Plaza and installation of the Statue by October of 1966. A true and correct copy of the letter dated May 13, 1966 is attached hereto and incorporated herein as **Exhibit “D”**.

14. That on October 12, 1966, the Columbus Plaza was completed and the Statue was placed upon the Plaza, where it remained for over fifty (50) years until on or about July 24, 2020. A true and correct copy of the dedication program is attached hereto and incorporated herein as **Exhibit “E”**.

15. That in July of 1973, Joseph Scoville, acting on behalf of Victor Arrigo, responded to a letter from Edmund L. Kelly of the District to a request for the Columbus Statue Committee to provide the District approximately Ten Thousand dollars (\$10,000.00) “for the upkeep of the Columbus statue in Vernon Park,” now known as the Victor Arrigo Park. A true and correct copy of Mr. Scoville’s letter is attached hereto and incorporated herein as **Exhibit “F”**.

16. That on August 8, 1973, Oscar O. D’Angelo, responding on behalf of the Columbus Statue Committee, proposed a contract between the Columbus Statue Committee and the District. A true and correct copy of Mr. D’Angelo’s letter is attached hereto and incorporated herein as **Exhibit “G”**.

17. That on August 25, 1973, Mr. Edmund L. Kelly submitted a recommendation to the Board of Commissioners of the District to accept the agreement prepared by Mr. D’Angelo in consideration of Ten Thousand Six Hundred Ninety-Five dollars and seventy-four cents (\$10,695.74). A true and correct copy of Mr. Kelly’s letter is attached hereto and incorporated herein as **Exhibit “H”**.

18. That on October 10, 1973, the Board of Commissioners of the District convened, and the Board duly approved the following order:

- a. “ORDERED, That authority be granted to execute an agreement with the Columbus Statue Committee whereby the Committee will transfer \$10,695.74 to the Park District for the purpose of maintaining in perpetuity the Columbus Statue and Plaza in Vernon Park.” (emphasis added).

19. That on the same day, October 10, 1973, the agreement between the District and the Columbus Statue Committee was executed and signed by Edmund L. Kelly, the General Superintendent of the District, by the President and Secretary of the District, and by Victor Arrigo and Oscar D'Angelo as legal counsel on behalf of the Columbus Statue Committee. A true and correct copy of the minutes of the approval of the Board of Commissioners and a copy of the agreement are attached hereto and incorporated herein as **Exhibits "I" and "J"** respectively.

20. That on July 24, 2020, the District caused and/or allowed the removal of the Statue from Victor Arrigo Park, which constitutes a substantial change to the Columbus Statue and the Columbus Plaza, and said removal was conducted without the District first obtaining approval from JCCIA, thereby violating the terms of the contract signed on October 10, 1973.

COUNT I:
COMPLAINT FOR SPECIFIC PERFORMANCE

1-20. The JCCIA restates and realleges the allegations set forth in Paragraph one (1) through Paragraph twenty (20) of this Complaint as if fully stated and alleged herein as Paragraph one (1) through twenty (20) of Count I.

21. That Paragraph two (2) of Exhibit "J", titled "Duty of the District to Maintain and Care for Columbus Plaza and Columbus Statue," states as follows:

- "2. Upon execution of this agreement, the DISTRICT will, *in perpetuity*,
- a. Maintain, keep and preserve, in good order, condition and repair and in the highest possible standards, the Plaza and Statue and all parts thereof and improvements thereto (including the grounds, concrete walls, lights, fountain and statue) (emphasis added);
 - b. Operate the fountain located in Columbus Plaza and have reasonable quantities of water running therein from 10:00 A.M. to 11:59 P.M., seven days a week, from April 1st to the Monday after the first Sunday in November or no later than the 10th of November of each and every calendar year; and
 - c. Obtain the approval, in writing, of the COMMITTEE before making any substantial change to Columbus Plaza or Columbus statue. If the COMMITTEE shall not be in existence then the approval of the Joint Civic Committee of the Italian Americans (the "JCCIA") shall be obtained prior to such change." (emphasis added) See **Exhibit "J"**.

22. That there exists a valid and enforceable contract between Plaintiff and Defendants in which Plaintiff paid Defendants the sum of Ten Thousand Six Hundred Ninety-Five dollars and seventy-four cents (\$10,695.74) in consideration for the perpetual maintenance, upkeep, and preservation of the Statue.

23. That Plaintiff performed their obligations under the contract by paying Defendants the \$10,695.74.

24. That by paying Defendants the \$10,695.74, there are no other obligations for the Plaintiff to perform pursuant to the contract.

25. That on or about July 24, 2020 the Statue was removed from Victor Arrigo Park, f/k/a Vernon Park.

26. That the removal of the Statue clearly constitutes a “substantial change” to the Columbus Statue and to the Columbus Plaza.

27. That the Columbus Statue Committee is no longer in existence, and thus any substantial change to the Columbus Statue or the Columbus Plaza must first be approved by the JCCIA. *See Exhibit “J”*.

28. That the removal of the Statue was conducted without the District first obtaining approval of the JCCIA.

29. That the removal of the Statue interfered with the District’s obligations to uphold the District’s obligations to the JCCIA, which are due and owing in perpetuity.

30. That Defendants breached their contract with Plaintiffs by failing to maintain, keep, and preserve the Columbus Statue and the Columbus Plaza in perpetuity and further failed to obtain the approval of the JCCIA before substantially changing the Columbus Plaza by virtue of the removal of the Columbus Statue.

31. That Defendants' breach has resulted in an injury to the Plaintiff in that it violated the express terms of the agreement.

WHEREFORE, the Plaintiff, THE JOINT CIVIC COMMITTEE OF ITALIAN AMERICANS ("JCCIA") respectfully requests the following relief:

A. That this Honorable Court find the Defendants breached their contract with the Plaintiff by failing to maintain, keep, and preserve the Statue and Columbus Plaza in perpetuity, as per the terms of the contract and/or making a substantial change to the Columbus Plaza without first obtaining the approval of the JCCIA;

B. That this Court Order the Defendants to specifically perform their obligations under the contract by overseeing, arranging, and paying for the return and display of the Columbus Statue to Columbus Plaza;

C. That this Court Order the Defendants to continue to fulfill their perpetual obligations of maintaining, keeping, and preserving the Statue after the Statue has been returned to display in Columbus Plaza;

D. That this Court Order the Defendants to pay the Plaintiff's attorney's fees, if any, and costs incurred in connection with seeking Defendants' compliance and specific performance with the contract; and

E. For any such other and further relief as this Honorable Court deems equitable and just under the facts and circumstances of this case.

COUNT II:
RESPONDENTS IN DISCOVERY

1-20. The JCCIA restates and realleges the allegations set forth in Paragraph one (1) through Paragraph twenty (20) of this Complaint as if fully stated and alleged herein as Paragraph one (1) through twenty (20) of Count II.

21. That upon information and belief, agents for the City of Chicago, at the direction of Mayor Lori E. Lightfoot, removed the Columbus Statue from Columbus Plaza as identified above in this complaint.

22. That upon information and belief, the City of Chicago is currently in possession of the Columbus Statue which is identified above and is the subject matter of this complaint.

23. That upon information and belief, Mayor Lori E. Lightfoot, and/or unknown agents of the City of Chicago, possess documentation which may include, but not be limited to, work orders, time sheets, billing records, receipts, emails, texts or other documents or communications between the City of Chicago, the Chicago Park District, or independent contractors during the time period up to and including the date the Columbus Statue was removed from Columbus Plaza on or about July 24, 2020.

24. That upon information and belief, Mayor Lori E. Lightfoot, and/or unknown agents of the City of Chicago, possess documentation which may include, but not be limited to, work orders, time sheets, billing records, receipts, emails, texts or other documents or communications between the City of Chicago, the Chicago Park District, or independent contractors during the time period from the date the Columbus Statue was removed from Columbus Plaza on or about July 24, 2020 until present date, including but not limited to, the current whereabouts of the Columbus Statue.

25. That the information sought by the Plaintiff is essential to the determination of whether or not other parties should be named as additional defendants in this complaint.

WHEREFORE, the Plaintiff, THE JOINT CIVIC COMMITTEE OF ITALIAN AMERICANS (the "JCCIA") respectfully requests the following relief:

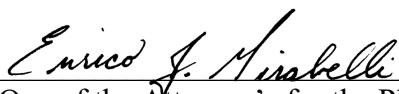
A. That this Honorable Court name Mayor Lori E. Lightfoot and the City of Chicago as Respondents in Discovery;

B. That this Court grant Plaintiff leave to issue discovery upon Mayor Lori E. Lightfoot and the City of Chicago pursuant to applicable Supreme Court Rules;

C. That this Court Order Mayor Lori E. Lightfoot and the City of Chicago to timely respond to any and all discovery requests issued by the Plaintiff in this matter; and

D. For any such other and further relief as this Honorable Court deems equitable and just under the facts and circumstances of this case.

Respectfully submitted,


One of the Attorney's for the Plaintiff

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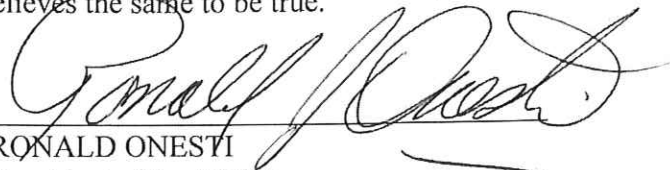
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STATE OF ILLINOIS)
) SS.
COUNTY OF COOK)

VERIFICATION BY CERTIFICATION

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.


RONALD ONESTI
President of the JCCIA

DATED: July 20, 2021

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STATE AND WASHINGTON BLDG. CORP.

17 NORTH STATE STREET, SUITE 908

CHICAGO 2, ILLINOIS

OPERATING

COLUMBUS MEMORIAL BLDG. - STEVENS BLDGS. - VENETIAN BLDG.
31 N. STATE STREET 17 N. STATE ST. 15 E. WASHINGTON ST.
18 N. WABASH AVE.

FILED
7/21/2021 10:44 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2021CH03558

14124822

June 26, 1958

Mr. Geo. T. Donahue, General Sup't.
Chicago Park District,
425 E. 14th Blvd.
Chicago 5, Illinois



Dear Sir:-

We are planning the demolition of the Columbus Memorial Building, and are wondering if you would be interested in accepting the Columbus statue which is located at the entrance of this building at 31 North State St. There are also two mosaic murals in the building, size approximately 15'6" long and 8'4" wide, one of them depicting the landing of Columbus - the other in the presence of royalty. We are enclosing herewith some pertinent information regarding both the statue and the murals.

These may be of interest to you.

Yours very truly,

STATE AND WASHINGTON BLDG. CORP.

BY

Israel Sweet
Secretary-Treasurer

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INFORMATION REGARDING COLUMBUS STATUE - also Mosaic work forming pictures
in various locations of the COLUMBUS MEMORIAL BUILDING
31 North State Street, Chicago, Illinois

* * * * *

The statue of Columbus is made of bronze and is nine feet high. It is intended to show the discoverer in the act of taking possession of the new world. On either side of the entrance to the building, above which stands the statue, are two memorial tablets in bronze. One reminds the reader that Christopher Columbus was born in Genoa in 1435; discovered America the 12th of October, 1492, and died at Valladolid, Spain, the 20th day of May, 1506. The other explains that the building was erected in honor of Columbus in the year 1892, being the 400th anniversary of the discovery of America. On the building are cornices decorated with Spanish medallions and coats of arms.

Inside the building, too, are many interesting features. The mosaic interior trim was brought over from Italy by special workmen to assemble it, one of whom remained in this country to keep it in repair until his death a few years ago. The marble used in the interior also was brought over from Italy and some fine old bronze and mahogany may be found there.

Regarding Mosaic work forming picture on the East wall of DeMets Candy Shop, 29 No. State Street in the Columbus Memorial Building, Chicago, Illinois -

The mosaic work as referred to in the above was installed during the year 1892 while the Columbus Memorial Building was in the final stages of construction preparatory to its completion for the official opening of the building in time for the opening date of the Columbian Exposition held in Chicago, Illinois, during the year 1893.

The picture in question represents the Landing of Columbus on one of the Bahama group, which he named San Salvador, on October 12, 1492, of which

our history of America gives an account.

The material of which the picture is formed is made up of a product known as glass mosaic, the Italian name of which is Smalti. This product is made in Venice, Italy, and also in Vatican City, Rome, Italy. The material for the picture in question was also made in Venice where the original patterns were cast and assembled in the forming of the picture which was made up in sections and pasted to paper forms preparatory for shipment to America. On its arrival here, these sections were set in place, imbedded in cement in their present location.

As has been mentioned in the foregoing, the material was manufactured in Venice and this material which is known as glass mosaic is formed and colored to meet requirements. In the process of manufacture, the mosaic is formed in bars and cut to size. All of this work is done by Italian labor which is exceptionally proficient in this art. In the assembling of the picture in its present location the workmen engaged on this work were imported from Venice and it may be added at this time that one of them, namely, Sarafino Scussel, was among those and under whose supervision this work was installed. On the completion of this work, Mr. Scussel was retained by the building management in the maintenance of the marble which adorns the walls of the corridors, floors and ceiling of the building. He passed away in January 1932 at 80 years of age.

The picture measures 15'6" long and 8'4" wide and made up of pieces of glass mosaic of varying sizes ranging from 3/8" to 1/2" in size. The color of each piece of mosaic is original and arranged according to color to make up the attire of the characters of the picture.

It might be added at this time that from information received from

authentic sources that considerable use is being made of glass mosaic or Smalti in Europe in copying the master pieces of famous painters. The reason for this is that this glass mosaic will not deteriorate or fade and in this manner the work of these masters can be retained for posterity's sake for an indefinite period.

We quote from an item in the Chicago Tribune of October 12, 1949:

"Today's celebrations could easily center at Washington and State Sts., either at the Columbus Memorial Building, 31 No. State St., or at the Roosevelt Theatre, diagonally northwest across the street. At the latter, Frederic March, the boy from Milwaukee, plays the cinema role of Christopher Columbus, the boy from Genoa, Italy, who also is claimed by the Spanish, Portuguese, French, Germans and Irish, The Russians Haven't gotten around to inventing him yet. The March opus in Technicolor is produced by J. Arthur Rank, an Englishman who also has discovered America and its capital city, Fort Knox, Ky. Mr. Rank, having done all right by Hamlet in America, has come right back with Columbus, and, in our personal opinion, done all right by Chris, too.

After viewing Mr. March's Columbus, you might step across the street to the facade of the Columbus Memorial Building and meet Henry J. Furber's Columbus. The edifice was erected in 1892 by Furber and his co-owner and architect, W. W. Boyington, in conjunction with the opening of the World's Columbian Exposition. Furber had a mania for Columbusana and collected every relic and memento of the great captain he could find in 20 years of European travel. The building was, in essence, built around the statue of Columbus which surmounts the entrance, a fine bronze which was the pride of Furber's collection around the entrance and just below the statue is a tablet series in bronze depicting the most memorable moments in the life of Columbus. The building trim on the sidewalk facings is studded with cornice medallions and masks reputed to have

-4-

originally been a part of a castle in Granada, Spain. The inner lobby trim is of glass mosaic called Smalti, set by Italian artists imported at the time from Venice, where the Smalti process has been handed down from father to son since ancient times.

"The collection of Columbus memorabilia that Mr. Furber loved to display in his suite of offices has long been dispersed, along with two bronze memorial tablets containing eulogies both to Columbus and to Furber and his associates which once decorated the entrance to the building.

"But if you are looking for the famous Smalti mosaic murals of the landing of Columbus and of Columbus at the court of Queen Isabella, you'll have to be a discoverer yourself. Once, among the sights of Chicago were the 18 feet by 8 foot twin pictures in the lobby of the Columbus Memorial Building. The tiny quarter-inch squares of colored glass which make up the pictures were set by hand over a period of years in Italy and shipped in sections to Chicago in time for the Columbian exposition. Now one is hidden behind drapes on the back wall of DeMet's tea room, 29 N. State St., and the other behind the wallboard maskings of the fitting rooms in the rear of Spiegel's dress shop, 27 No. State."

We quote again from the Chicago Daily News of October 12, 1953:

"Consuls of Spain and the Dominican Republic placed
flowers before the statue of Columbus at the Columbus
Memorial Building at Washington and State."

CITIZENS COMMITTEE ON MONUMENTS AND MEMORIALS
IN THE CHICAGO PARK DISTRICT

Meeting of Thursday, July 24, 1958

A meeting of the Citizens Committee on Monuments and Memorials in the Chicago Park District, was called Thursday, July 24, at 12:15 p.m., to consider the merits of the Columbus statue, arch and bas-relief work located at the entrance to the Columbus Memorial building and the two large murals within the building. Attending the meeting were Mr. Alfred P. Shaw, Mr. Paul Gerhardt, Jr., Mr. Charles H. Dornbusch and Mr. George T. Donoghue.

Demolition of the Columbus Memorial building is to start soon and the building owners have asked Mr. Donoghue if the Chicago Park District would be interested in accepting the monument and the murals. While the Park District will take no initiative to acquire these works it is understood that a number of groups have been negotiating for their acquisition with a view to having them placed in the parks.

The committee members inspected the monument, archway and bas-relief work around the entrance to the building as well as the two mosaic murals on interior walls. During luncheon at the Illinois Athletic Club discussion was held and the following conclusions reached:

It was agreed that the statue of Columbus is a better than average piece of sculpture which has interesting potentials. Because of its construction and proportions the statue cannot stand alone; wherever it is re-erected it will need a background similar to the niche in which it now stands.





CITY OF CHICAGO
DEPARTMENT OF URBAN RENEWAL

320 NORTH CLARK STREET

CHICAGO, ILLINOIS 60610

TELEPHONE 744-4000

RICHARD J. DALEY
MAYOR

LEWIS W. HILL
COMMISSIONER

MEMBERS OF THE BOARD

LEWIS W. HILL
CHAIRMAN

NORMAN F. BARRY
DELBERT W. COLEMAN
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ROBERT N. LANDRUM

D. E. MACKELMANN
DEPUTY COMMISSIONER

R. G. ZUNDEL
DEPUTY COMMISSIONER

APR 1 - 1966

Mr. Arthur L. Schultz
Public Relations Department
Chicago Park District
425 East 14th Boulevard
Chicago, Illinois - 60605

Dear Mr. Schultz:

Re: Near West Side Urban Renewal Project
Columbus Plaza Proposal

The enclosed material on the Proposed Columbus Plaza is for your file of the Citizens Memorials Committee.

The additional photographs, together with the brochure illustrate the merits of the proposal. However, if a representative of the Department of Urban Renewal were to be present at your April 4th meeting I am sure it would be of help to your committee to have the additional first hand information immediately available.

Sincerely yours,

R. G. Zundel
LEWIS W. HILL
Commissioner

Enclosures



THE COLUMBUS PLAZA

DESIGN PROPOSAL

A meaningful setting for the fine full bronze statue of Columbus is the prime objective of the Plaza.

Setting the theme are three curving walls (symbolic of wind, sail and wave forms) that modulate the flow of space. The scale and direction of the Pedestrian Greenway System (connecting the Medical Center to the University of Illinois) is culminated by the Plaza as a major focal point of the community.

The statue is subtly elevated in a reflecting pool and fountain which faces on the westward axis of Polk Street, a link in the Pedestrian Greenway.

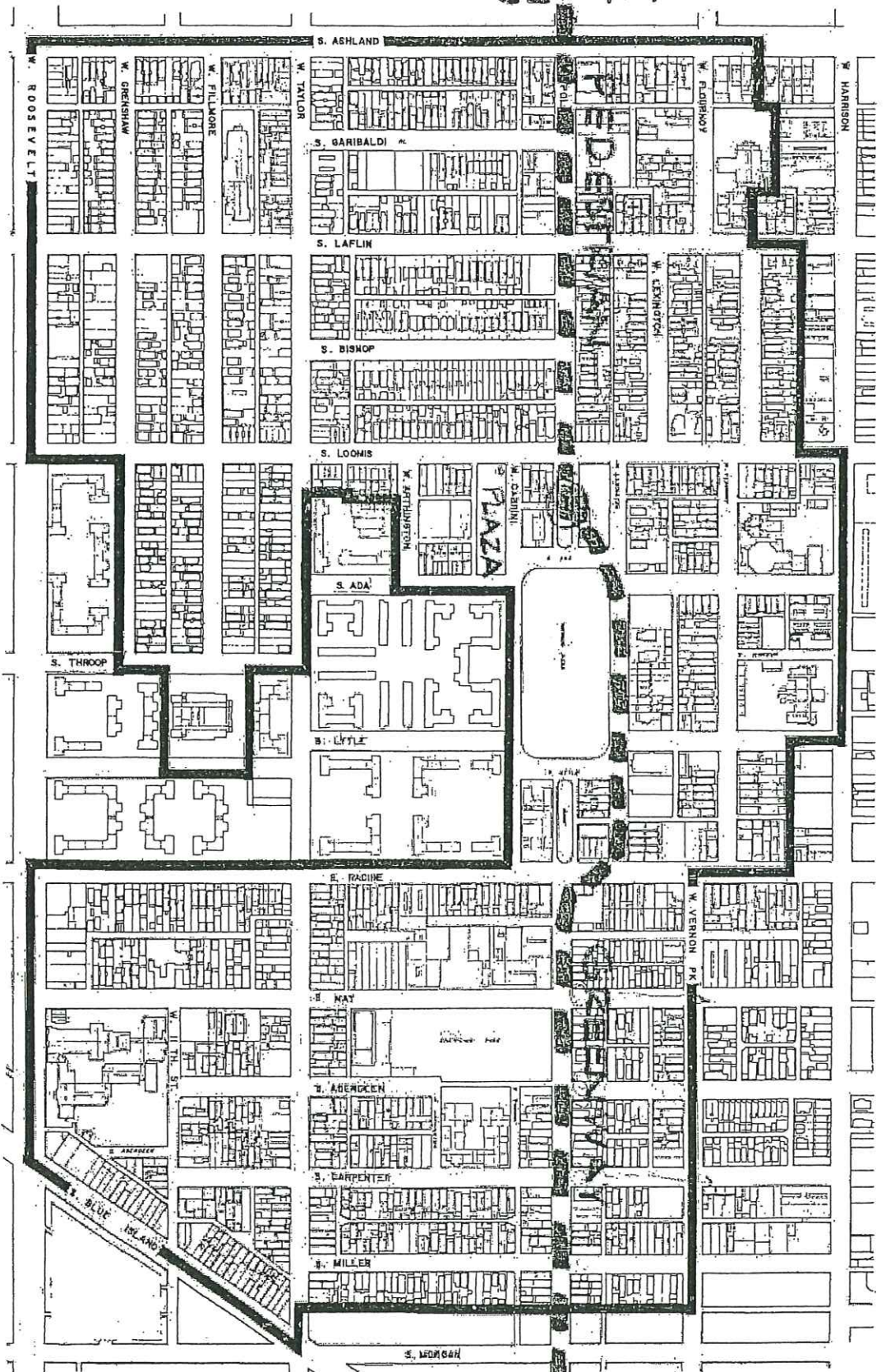
Careful selection and placement of distinctive trees, lighting and benches complete the Plaza.

A SUGGESTED PLAZA DESIGN
FOR
CHRISTOPHER COLUMBUS PLAZA
WITHIN THE
NEAR WEST SIDE URBAN RENEWAL PROJECT

PREPARED BY THE
DEPARTMENT OF URBAN RENEWAL
CITY OF CHICAGO

IN COOPERATION WITH
THE NEAR WEST SIDE CONSERVATION COMMUNITY
COUNCIL, THE MUNICIPAL ART LEAGUE OF CHICAGO,
AND THE CHICAGO PARK DISTRICT.

MEDICAL
CENTER

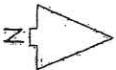


UNIVERSITY OF ILLINOIS
CIRCLE CAMPUS

BOUNDARY MAP

NEAR WEST SIDE
CONSERVATION PROJECT

DEPARTMENT OF URBAN RENEWAL
CITY OF CHICAGO
JULY, 1963



0 100 200 300 400
SCALE IN FEET



CITY OF CHICAGO
DEPARTMENT OF URBAN RENEWAL

320 NORTH CLARK STREET

CHICAGO, ILLINOIS 60610

TELEPHONE 744-4000

RICHARD J. DALEY
MAYOR

MEMBERS OF THE BOARD

LEWIS W. HILL
CHAIRMAN

NORMAN F. BARRY
DELBERT W. COLEMAN
JAMES D. GREEN
ROBERT N. LANDRUM

MAY 13 1966

LEWIS W. HILL
COMMISSIONER

D. E. MACKELMANN
DEPUTY COMMISSIONER

R. G. ZUNDEL
DEPUTY COMMISSIONER

Mr. Erwin Weiner
General Superintendent
Chicago Park District
425 East 14th Boulevard
Chicago, Illinois - 60605

Dear Mr. Weiner:

Attention: Mr. Robert A. Black

Re: Urban Renewal Project Near West Side
Columbus Plaza

This is in reply to your letter of April 28, 1966, regarding the approval of the Columbus Plaza in the Near West Side Urban Renewal Project.

The following is in response to the three qualifications that you have raised:

Your first qualification was:

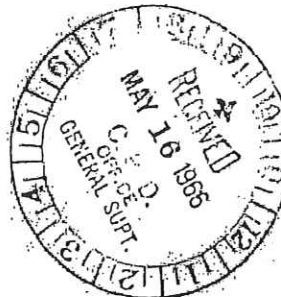
"1. That no cost to the Park District is involved."

The Department of Urban Renewal will erect, at its expense, the complete Plaza as detailed on the construction drawings. We would again appreciate any further comments from your design staff on the construction plans.

Your second qualification was:

"2. That a trust fund for the perpetual maintenance of the monument and surrounding plaza be established, and that all pertinent details concerning this trust fund be furnished to the Park District."

We have contacted the "Columbus Statue Committee" advising them of your request to finalize the details of the trust fund. The Committee's president, Mr. Victor Arrigo, an attorney, has stated that nearly one-fifth of the goal has been deposited and that the Committee will seek the Park District's assistance in working out the many details of the trust fund. A copy of the Committee's fund raising letter is enclosed.



XERO COPY

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CITY OF CHICAGO
DEPARTMENT OF URBAN RENEWAL

Mr. Erwin Weiner

- 2 -

Your third qualification was:

- "3. That a qualified sculptor, preferably from the Art Institute, review the bronze figure to determine its suitability for the purpose and location intended."

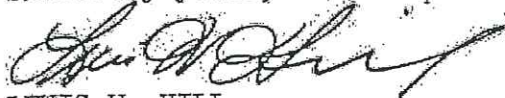
Professor Egon Weiner, the noted sculptor from the Art Institute of Chicago, has researched and reviewed the proposal as you had requested. Professor Weiner is highly in favor of the proposal. The enclosed copy of a letter from him explains more fully the depth and objectivity of the Professor's endorsement.

If you have completed your review of the contract plans, a conference between our design staffs would be worthwhile to resolve any items of refinement. Following that, I would appreciate your earliest possible approval to permit us to advertise the work in order to dedicate the Plaza on October 12, 1966.

Also enclosed, is a set of the contract terms and conditions which will be incorporated into our specifications. Insurance provisions are covered on Pages CT-17 through 20. If these provisions meet with your approval, we shall appreciate, at that time, a letter of authority to proceed with construction on the land presently owned by the Chicago Park District as defined on the enclosed plats of survey. A request has been initiated to vacate the public right of way involved.

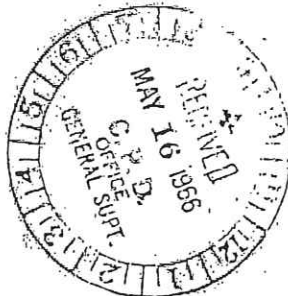
I would anticipate sale of Parcels 5 and 26 to the Park District upon completion and acceptance of the improvement on or about October 12, 1966.

Sincerely yours,



LEWIS W. HILL
Commissioner

Enclosures



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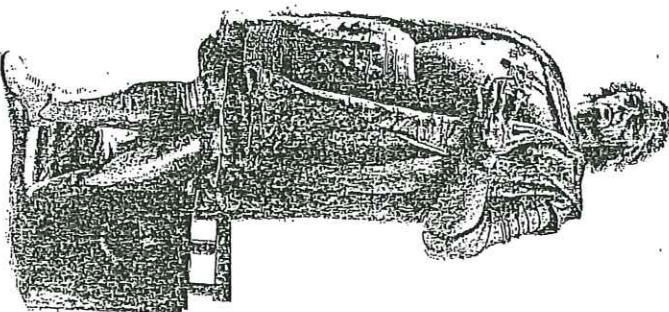
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FILED DATE: 7/21/2021 10:44 AM 2021CH03558

COLUMBUS
PLAZA
DEDICATION



CHICAGO, ILLINOIS—OCTOBER 12, 1966

COPY





CITY OF CHICAGO

Richard J. Daley, Mayor
Donald W. Parrillo, Alderman—1st Ward

CHICAGO DEPARTMENT
OF URBAN RENEWAL

Levi W. Hill, Chairman and Commissioner
Louis M. Pagones, Near West Side Coordinator
Stephen Konián, Architect for Design

CHICAGO PARK DISTRICT

James H. Gately, President
Erwin Weiner, General Superintendent

MUNICIPAL ART LEAGUE
OF CHICAGO

Frank Chetrow, President

NEAR WEST SIDE
CONSERVATION
COMMUNITY COUNCIL

Oscar O. D'Angelo, Chairman

THE COLUMBUS
STATUE COMMITTEE

Victor A. Artigo, President

CONSULTING ARCHITECTS

Consuet & Morgan

CONSULTING ENGINEERS

Consuet, Townsend & Associates

PRIME CONTRACTOR

Herlby Mid-Continent Company

PROGRAM

Posting of Colors:

Filippo Mazzei Post No. 1 Italian-American War Veterans of U.S.A.
Commander Hugo Panarese
Knights of Columbus Honor Guard
State Deputy
Marco De Stefano

National Anthem of Italy National Anthem of The United States of America

Fifth United States Army Band
Chief Warrant Officer B. G. Cook

REMARKS

Lewis W. Hill, Commissioner
Department of Urban Renewal

Victor A. Arrigo, President
The Columbus Statue Committee

Frank Chesrow, President
Municipal Art League of Chicago

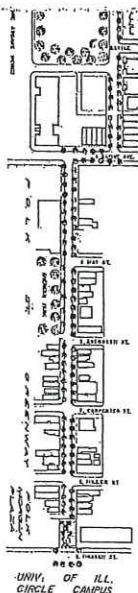
Richard J. Daley, Mayor
City of Chicago

Frank Annunzio, Congressman
7th U.S. Congressional District

Joseph A. Califano Jr., Special
Assistant to the President
of The United States

Unveiling of Statue Mrs. Demetria Panepinto

Benediction His Excellency the Most Reverend
Archbishop John P. Cody



COLUMBUS PLAZA

The statue of Christopher Columbus in the Columbus Plaza at the intersection of Polk and Loomis Streets is the creation of the noted sculptor, the late Moses Ezekiel. This nine-foot bronze tribute to Columbus was cast in Rome in 1893. Moses Ezekiel was commissioned by the owners of the Columbus Memorial Building, 31 N. State Street, to create the Statue for the opening of the World's Columbian Exposition.

The Columbus Statue was later placed in a niche over the entryway of the Columbus Memorial Building. When the Columbus Building was razed in June, 1959, the building's owners entrusted the statue to the Municipal Art League of Chicago for final disposition.

Since the Near West Side has been, traditionally, a port of entry for Italian immigrants and with the provision of space for park expansion made possible by the provision of improvement program for the area, this neighborhood was proposed as an ideal setting.

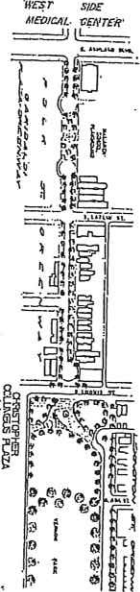
The development of the Plaza involved the cooperative efforts of the Columbus Statue Committee, the Municipal Art League, the Chicago Park District, the Near West Side Conservation Community Council, the Chicago Department of Urban Renewal and other City offices.

Stephen Roman, architect-designer for the Department of Urban Renewal developed the plans for Columbus Plaza in cooperation with the Chicago Park District and supervised the restoration of the statue.

Columbus Plaza is located in the heart of the Near West Side Conservation Area in the center of the Polk-Lexington Greenway, one of the first park-malls being built in the City of Chicago community improvement program. A cluster of Linden trees in the Morgan-Polk Plaza start the pedestrian greenway along Polk Street from Morgan to Racine Avenues. From Racine, the Lexington Street row of Lindens gracefully enters the Columbus Plaza.

The flow theme is carried out symbolically in the Columbus Plaza. The large mass of the north wall, with its earth beam, represent the force of wind. Onyx inserts in the south wall with its earth beam represents the force waves. The third free-standing wall represents a sail. The statue of Columbus in the granite fountain faces the westward axis of the Polk Street Greenway.

From the Plaza, the row of Lindens will continue along Polk Street to a new Garibaldi Greenway near Ashland Blvd. Italian-American community sentiment and pride in heritage were factors in the selection of a meaningful site for Columbus Plaza. But just as Columbus belongs to all Americans, Columbus Plaza was created for the enjoyment of all Chicagoans.



JOSEPH SCOVILLE
ATTORNEY AT LAW
100 NORTH LA SALLE STREET
CHICAGO, ILLINOIS 60602
TELEPHONE STATE 2-6639

July 27, 1973

The Officers and Members of the
Board of Directors of the
Columbus Statue Committee

Gentlemen:

As you know, the undersigned is acting in behalf
of Victor A. Arrigo who, at the present time, is ill.

He has instructed me to communicate with you in
regard to turning over the \$10,000.00 which is now in
our bank account, and to donate it to the Park District
for the upkeep of the Columbus Statue in Vernon Park.

Attached hereto and made a part of this letter
is a photocopy of a letter from the Chicago Park
District, dated May 16, 1973, addressed to Mr. Arrigo
and signed by Edmund L. Kelly.

Will each of you approve the transfer of the said
funds to the Park District for the purposes as stated in
the attached letter, by signing this letter and returning
it to the undersigned.

Call me should you have any questions.

Very truly yours,
Joseph Scoville
Joseph Scoville

JS/lf

Enclosure

APPROVED:

COPY



TELEPHONE 312 / 562-0132

LAW OFFICES

FIFFER AND D'ANGELO

SUITE 1100-308 SOUTH LA SALLE STREET

CHICAGO 60604

OF COUNSEL
LEONARD L. COWAN (94-1098)

ROBERT S. FIFFER
DINO J. D'ANGELO
SCOTT J. D'ANGELO
HOWARD KORNBERG
ALLAN N. LASKY
MARKET L. LAFIN
LAURENCE C. KOZLICH
JOEL L. WIDMAN
STEPHEN L. BERGER
NICHOLAS J. ROSEN
AARON LEVINE
HOWARD KORNBERG
HOWARD PALTERMAN

August 8, 1973

Mr. Joseph Scoville, Esquire
100 North LaSalle Street
Chicago, Illinois

Re: Columbus Statue Committee

Dear Joe:

Enclosed please find the original and copy of a proposed Agreement between the Columbus Statue Committee and the Chicago Park District. I have sent copies to the other members of the Committee and request that any comments be directed to you. I feel that the Agreement is adequate and should be acceptable to the Chicago Park District in view of the fact that they have been operating the fountain and maintaining the grounds under the same conditions set forth in the Agreement.

You will note that the amount stated in the Agreement (\$10,695.74) is approximately \$350.00 less than the amount actually existing in the account. The reason being that Mr. Tony Nutini of Illinois Bronze Company is replacing the cross and twelve links of the chain that were stolen approximately one year ago for the approximate amount of \$350.00. If you have any questions please feel free to call on me.

Very truly yours,

FIFFER AND D'ANGELO

Oscar

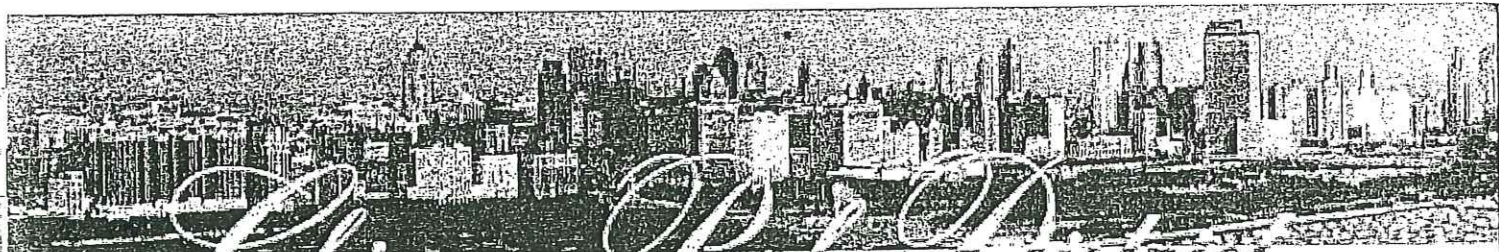
Oscar O. D'Angelo

OOD:klw
cc: Members of the Committee

COPY



FILED DATE: 7/21/2021 10:44 AM 2021CH03558



Chicago Park District

ADMINISTRATION BUILDING 425 EAST McFETRIDGE DRIVE, CHICAGO, ILLINOIS 60605 • PHONE 294-2200

PATRICK L. O'MALLEY, President • WILLIAM A. LEE, Vice-Pres. • EDWARD J. ROSEWELL, GALE E. SAYERS, FRANKLIN B. SCHMICK, Commissioners • EDMUND L. KELLY, Genl. Supt.

August 25, 1973

SUBJECT: Agreement with Columbus Statue Committee
to maintain the Columbus Statue and
Plaza in Vernon Park

To the Honorable
Board of Commissioners of the
Chicago Park District

Gentlemen:

I submit herewith and recommend the adoption of an order
approving an agreement with the Columbus Statue Committee
whereby the Committee will transfer \$10,695.74 to the
Park District for the purpose of maintaining in perpetuity
the Columbus Statue and Plaza in Vernon Park.

Respectfully submitted,

Edmund L. Kelly
EDMUND L. KELLY
General Superintendent

APPROVED:

Daniel P. Coman
DANIEL P. COMAN
General Attorney

APPROVED AS TO FORM AND LEGALITY:

Daniel P. Coman
DANIEL P. COMAN
General Attorney

RFD/mig



10-10-73

JOURNAL OF THE PROCEEDINGS
OF THE
BOARD OF COMMISSIONERS
OF THE
CHICAGO PARK DISTRICT

Adjourned Regular Meeting held Wednesday, October 10, 1973
at 10:00 o'clock A.M.

ADMINISTRATION BUILDING - BURNHAM PARK
CHICAGO, ILLINOIS

OFFICIAL RECORD

Present- Commissioners Rosewell, Lee, O'Malley.

Absent- Commissioners Sayers, Schmick.

CALL TO ORDER

On Wednesday, October 10, 1973 , at ten o'clock in the forenoon
(the day and hour appointed for the meeting), Honorable Patrick L. O'Malley
president, called the board to order.

QUORUM.

The secretary called the roll of members and there was found to be a
quorum present.

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10-10-73

AUTHORITY TO EXECUTE AN AGREEMENT WITH THE COLUMBUS STATUE COMMITTEE TO
MAINTAIN THE COLUMBUS STATUE AND PLAZA IN VERNON PARK

(15)

The general superintendent submitted his report, wherein he recommended
that the following order be adopted:

ORDERED, That authority be granted to execute an agreement
with the Columbus Statue Committee whereby the Committee
will transfer \$10,695.74 to the Park District for the
purpose of maintaining in perpetuity the Columbus
Statue and Plaza in Vernon Park.

Commissioner Lee moved that the report be filed and that the order be
adopted.

The motion prevailed and the order was adopted, by yeas and nays as
follows:

Yeas: Commissioners Rosewell, Lee, O'Malley - 3.

Nays: None.

A G R E E M E N T

THIS AGREEMENT made and entered into as of the 10th
^{October}
day of ~~September~~, 1973 by and between the COLUMBUS STATUE
^{St. O.O.S.}
COMMITTEE, an Illinois not-for-profit corporation, herein-
after referred to as the "COMMITTEE" and the CHICAGO PARK
DISTRICT, a body politic and corporate, hereinafter referred
to as the "DISTRICT".

W I T N E S S E T H:

WHEREAS, the Department of Urban Renewal of the City of
Chicago purchased the site at Polk and Loomis Streets, Chicago,
Illinois; and

WHEREAS, the Municipal Art League of Chicago donated to
the City of Chicago a nine-foot bronze statue of Christopher
Columbus executed in 1893 by sculptor Moses Ezekiel; and

WHEREAS, the Department of Urban Renewal of the City of
Chicago caused a Plaza to be constructed at Polk and Loomis
Streets, Chicago, Illinois, and such statue of Christopher
Columbus was placed in the Plaza and the statue formally
dedicated on October 11, 1966; and

WHEREAS, the COMMITTEE has raised and deposited with the
Cosmopolitan National Bank of Chicago, 801 North Clark Street,
Chicago, Illinois, Ten Thousand, Six Hundred Ninety-five and

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EXHIBIT

J

74/100th Dollars (\$10,695.74) with a view to the perpetual care and maintenance of this plaza and the Columbus Statue; and

WHEREAS, the DISTRICT has requested the transfer of such funds held by the COMMITTEE to the DISTRICT for the purpose of helping to defray the cost of maintaining and caring for the Columbus Plaza and Columbus Statue;

NOW, THEREFORE, in consideration of the mutual promises, covenants and agreements herein contained, the parties hereto agree as follows:

TRANSFER OF FUNDS TO THE DISTRICT

1. Upon execution of this agreement, the COMMITTEE will promptly transfer to the DISTRICT the funds in the amount of Ten Thousand, Six Hundred Ninety-five and 74/100th Dollars (\$10,695.74), now on deposit with the Cosmopolitan National Bank of Chicago, to use for the purposes specified in paragraph two herein:

DUTY OF THE DISTRICT TO MAINTAIN AND CARE
FOR COLUMBUS PLAZA AND COLUMBUS STATUE

2. Upon execution of this agreement, the DISTRICT will, in perpetuity,

a. Maintain, keep and preserve, in good order, condition and repair and in the highest possible standards, the Plaza and Statue and all parts thereof and improvements thereto (including without limitation the grounds, concrete walls, lights, fountain and statue);

b. Operate the fountain located in Columbus Plaza and have reasonable quantities of water running therein from 10:00 A.M. to 11:59 P.M., seven days a week, from April 1st to the Monday after the first Sunday in November or no later than the 10th of November of each and every calendar year; and,

c. Obtain the approval, in writing, of the COMMITTEE before making any substantial change to Columbus Plaza or Columbus Statue. If the COMMITTEE shall not be in existence then the approval of the Joint Civic Committee of the Italian Americans (the "JCCIA") shall be obtained prior to such change.

NOTICES

3. Any and all notices required to be sent pursuant to the terms of this agreement shall be sent registered mail and addressed as follows:

To the DISTRICT
Chicago Park District
c/o General Superintendent
425 East McFetridge Drive
Chicago, Illinois 60605

To the COMMITTEE
c/o Joseph Schoville
100 North La Salle Street
Chicago, Illinois 60602

ENTIRE AGREEMENT

4. This instrument contains the entire Agreement between the parties hereto with respect to the transactions contemplated herein, all prior representations, agreements, or understandings, written or oral, having been merged herein and superseded hereby.

COUNTERPARTS

5. This agreement has been executed in multiple counterparts, each of which shall, for all purposes, constitute a duplicate original.

AUTHORITY

6. The individual officers, agents and employees of the COMMITTEE and the DISTRICT who have executed this agreement do hereby individually represent and warrant that they have full power and lawful authority to execute this agreement and perform the transactions contemplated hereunder, on behalf of and in the name of their respective principals and/or employer.

CLAUSE HEADINGS

7. The clause headings appearing in this agreement have been inserted for the purpose of convenience and ready reference. They do not purport to, and shall not be deemed to, define, limit or extend the scope or intent of the clauses to which they pertain.

IN WITNESS WHEREOF, the undersigned, by their respective duly authorized agents or representatives, have executed and delivered this agreement all as of the day and year first above written.

CHICAGO PARK DISTRICT

By Patrick L. O'Malley
President

(SEAL)

By Michael H. Mc Dermott
Secretary

COLUMBUS STATUE COMMITTEE

By Victor W. Arrigo
President

(SEAL)

By Dean P. D'Angelis
Secretary

APPROVED:

E. L. Kelly
General Superintendent

APPROVED AS TO LEGAL FORM

J. K. Walsh
Chief Engineer

Daniel P. Cowan
General Attorney

Date 9-25-73

No. 15 ✓

AGREEMENT WITH THE COLUMBUS STATUE COMMITTEE: SAID COMMITTEE TO TRANSFER \$10,695.74 TO THE CHICAGO PARK DISTRICT FOR THE PURPOSE OF MAINTAINING IN PERPETUITY THE COLUMBUS STATUE & PLAZA IN VERNON PARK:

Report From: Gen. Supt.

Moved by Commissioner _____

Roll Call	Yeas	Nays	Board Action
Comm. Rosewell			Referred to _____
Comm. Sayers			Adopted _____
Comm. Schmick			Passed _____
Comm. Lee ✓			Approved _____
Pres. O'Malley			Rec'd. and Filed _____

Remarks: _____

(A29389)