

No.
IN THE
SUPREME COURT OF THE UNITED STATES

DEANDRE MCMICHAELS, Petitioner,
-vs-

PEOPLE OF THE STATE OF ILLINOIS, Respondent.

On Petition For Writ Of Certiorari
To The Appellate Court Of Illinois

PETITION FOR WRIT OF CERTIORARI

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QUESTION PRESENTED FOR REVIEW

In the wake of *McDonald v. City of Chicago*, 561 U.S. 742 (2010), jurisdictions throughout the nation have recognized the breadth and importance of the Second Amendment right to bear arms. Many states now allow some form of public carry of firearms, sometimes in conjunction with a license and registration requirement. The Fourth Amendment requires reasonable suspicion or probable cause that a person is involved in criminal activity before they can be detained by police. *Terry v. Ohio*, 392 U.S. 1 (1968). This question presented in this case is:

In a state that permits residents to legally carry concealed firearms while in public, whether or under what circumstances an officer's belief that a person is armed allows the officer to infer for purposes of a *Terry* search that the person is "presently dangerous" and thus subject to seizure?

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The petitioner, DeAndre McMichaels, respectfully prays that a writ of certiorari issue to review the judgment below.

OPINION BELOW

The published opinion of the Illinois Appellate Court (Appendix A) is reported at 2019 IL App (1st) 163053. The order denying rehearing (Appendix B) is not reported. The order of the Illinois Supreme Court denying leave to appeal (Appendix C) is reported at 154 N.E.3d 753 (Table).

JURISDICTION

On October 29, 2019, the Illinois Appellate Court issued its decision. A petition for rehearing was timely filed and denied on May 5, 2020. The Illinois Supreme Court denied a timely filed petition for leave to appeal on September 30, 2020. The time for filing in this Court was extended to February 27, 2021, by the order extending deadlines in light of COVID-19. Misc. Order, 589 U.S. __ (March 19, 2020). The jurisdiction of this Court is invoked pursuant to 28 U.S.C. §1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

The Second Amendment to the United States Constitution, made applicable to the states by the Fourteenth Amendment, provides:

A well regulated Militia, being necessary to the security of a free State, the right of the people to keep and bear Arms, shall not be infringed.

The Fourth Amendment to the United States Constitution, made applicable to the states by the Fourteenth Amendment, provides, in relevant part:

The right of the people to be secure in their persons * * * against unreasonable searches and seizures, shall not be violated. * * *

The Illinois Firearm Concealed Carry Act (430 ILCS 66/1 *et seq.*) is set out in its entirety in Appendix D.

STATEMENT OF THE CASE

This case arises from a felony conviction for possessing a concealed and loaded firearm without a concealed carry permit. *People v. McMichaels*, 2019 IL App (1st) 163053, ¶ 1, *appeal denied*, 154 N.E.3d 753 (Ill. 2020); (Appendix A). In Illinois, it was legal to carry a fully or partially concealed firearm with a proper permit at the time of McMichaels' arrest. 430 ILCS 66/10(a) & (c)(1); (Appendix D). McMichaels was seized by the police based on an anonymous tip that a man matching his description had a gun, and because he put his hands in his pocket and turned away from the police upon their arrival. *McMichaels*, 2019 IL App (1st) 163053, ¶¶ 4, 5. He was then immediately arrested upon an officer's observation of a gun in his waistband prior to any questioning as to whether he was licensed to carry a firearm. *McMichaels*, 2019 IL App (1st) 163053, ¶¶ 4, 5.

The Fourth Amendment protects "the right of the people to be secure in their persons * * * against unreasonable searches and seizures." U.S. Const. amend. IV. Law enforcement may briefly stop and question someone based on an objectively reasonable suspicion that the person is engaged in criminal activity, and an arrest must be supported by probable cause. *Terry v. Ohio*, 392 U.S. 1, 16-27 (1968). McMichaels contested his initial stop and ultimate arrest on Fourth Amendment grounds in both pretrial and posttrial motions, as well as on appeal.

Factual Background

At the simultaneous bench trial and hearing on McMichaels' motion to suppress, Chicago police officer Christopher Cannata testified that on May 24, 2016, he and his two partners, Officers Martino and Pavone, were on patrol. They received a call from

dispatch that a black male with dreadlocks, wearing a black t-shirt and yellow shorts was in possession of a black handgun in the vicinity of Lamon Avenue and Ferdinand Street. Cannata recognized the description of the individual as a man they had seen standing at that location earlier in their patrol. The officers arrived at 4908 West Ferdinand a few minutes later, and saw a man matching that description, later identified as McMichaels, standing on the corner with several other individuals. *McMichaels*, 2019 IL App (1st) 163053, ¶¶ 4-6; (Appendix A).

At that time, the three officers got out of their unmarked squad car, approached McMichaels and the other individuals, announced their office and demanded to see all of the individuals' hands. The three individuals standing with McMichaels held their hands out towards the officers, while McMichaels placed one hand into his right short pocket and began to turn away from the officers. Then, within seconds, Cannata and his partners closed the distance between themselves and McMichaels, repeating their order that he show his hands; McMichaels did not comply. Officer Martino grabbed McMichaels by the shoulder as Officer Cannata came around the right side of McMichaels' body. McMichaels' hand broke free from his pocket, and Cannata observed the butt and slide portion of a semiautomatic handgun protruding from his right shorts pocket. *McMichaels*, 2019 IL App (1st) 163053, ¶ 5.

Cannata immediately removed the gun from McMichaels' pocket and placed him into custody. At the police station, after being Mirandized, McMichaels admitted that he carried the gun for protection because he had been shot at on that block previously. He was convicted of Armed Habitual Criminal in violation of 720 ILCS 5/24-1.7 (2016) based on his possession of the gun. *McMichaels*, 2019 IL App (1st) 163053, ¶¶ 7-8.

Procedural Background

Prior to trial, McMichaels filed a motion to quash arrest and suppress evidence. The trial court heard the motion simultaneously with McMichaels' bench trial. The court denied the motion on the basis that the anonymous tip of a man with a gun and McMichaels' refusal to comply with the officers' order that he put his hands up, established more than a reasonable suspicion that McMichaels was in possession of a gun. The court denied McMichaels' motion for new trial, which argued that his motion should have been granted. *McMichaels*, 2019 IL App (1st) 163053, ¶¶ 10-11.

On direct appeal, McMichaels argued that the motion to quash arrest and suppress evidence should have been granted, and that the warrantless search and arrest in this case violated his constitutional right to be free from unreasonable seizures. Specifically, McMichaels contended that the anonymous tip of a man carrying a gun did not create a reasonable suspicion of criminal activity to support the officers' initial seizure of McMichaels by ordering him to put his hands up or physically restraining him by his arms when he failed to comply. Nor did his mere act of turning away from the officers suggest that he was dangerous.

The Illinois Appellate Court affirmed in a published opinion. *People v. McMichaels*, 2019 IL App (1st) 163053; (Appendix A). The appellate court first concluded that the officers had a reasonable suspicion to support a *Terry* stop where they had received an anonymous call of a man with a gun who matched McMichaels' description and because "defendant had twice refused the officers' requests to show his hands and instead put his hand in his pocket and turned away." *Id.* at ¶ 23. The appellate court concluded that McMichaels was not seized for Fourth Amendment

purposes until the officers physically grabbed his arm to restrain him. *McMichaels*, 2019 IL App (1st) 163053, ¶ 32. While noting that the refusal to cooperate with the police “without more” is generally insufficient to give rise to a reasonable suspicion, the appellate court found the seizure proper here because of the additional fact that McMichaels was suspected of carrying a gun; thus his “furtive movement” justified the seizure. *McMichaels*, 2019 IL App (1st) 163053 at ¶¶ 24, 32. The Illinois Supreme Court declined to review the appellate court’s published opinion. (Appendix C).

REASONS FOR GRANTING CERTIORARI

Resolving this case can provide guideposts to alleviate the tension growing between lawful gun owners and law enforcement. Currently, federal courts of appeals and state courts are divided over whether and when police officers can stop someone seen carrying a firearm in states where public concealed possession is not *per se* illegal. U.S. Const., amends IV, XIV; *Terry v. Ohio*, 392 U.S. 1 (1968) (providing that investigative stops in addition to arrests are governed by the Fourth Amendment). In the decade since *McDonald v. City of Chicago*, 561 U.S. 742 (2010), this country has seen a renewed appreciation for the historical and constitutional importance of the right to bear arms. See also U.S. Const., amends II, XIV (providing the federal constitutional right to “keep and bear arms” which is enforceable against the states). As legal gun possession increases, it is vital that law enforcement and citizens alike have guidance on how the police can safely fulfill their duties without infringing the rights of lawful gun owners.

This case provides a good vehicle to address what is required to establish a reasonable suspicion to stop an individual for possessing a gun in states where public possession is not *per se* illegal. McMichaels was seized following a 911 call that a man matching McMichaels’ description had a handgun, and where he put his hand in his pockets and turned away from the officers when they approached him. He was immediately arrested without any inquiry into whether he possessed a licence to carry the gun. In short, McMichaels’ stop and arrest exposes the limits on Fourth Amendment protections for anyone lawfully carrying a gun in public.

I. Federal and state courts are divided over how to apply the Fourth Amendment in states that allow public gun possession.

Courts are sharply divided over what the Fourth Amendment requires to stop someone for gun possession in states where such possession is legal with a license.

On one side of the divide, multiple courts have held that public gun possession is presumptively illegal for purposes of the Fourth Amendment, unless and until the citizen proves otherwise. *United States v. Gatlin*, 613 F.3d 374, 378 (3d Cir. 2010); *United States v. Pope*, 910 F.3d 413, 415-16 (8th Cir. 2018), *cert. denied*, 140 S. Ct. 160 (2019); *United States v. Rodriguez*, 739 F.3d 481, 491 (10th Cir. 2013); *State v. Timberlake*, 744 N.W.2d 390, 394-97 (Minn. 2008). As explained by the Third Circuit, the rationale is that public gun possession can be presumed illegal if the jurisdiction treats having a permit as an affirmative defense. Compare *Gatlin*, 613 F.3d at 378, with *United States v. Ubiles*, 224 F.3d 213, 217 (3d Cir. 2000). Thus, whether there can be a stop depends on how each jurisdiction drafts and implements the laws permitting gun possession.

On the other side of the divide, courts have said that the gun possession cannot be presumed illegal for purposes of the Fourth Amendment unless accompanied by other indicia of illegality. *Northrup v. City of Toledo Police Dep't*, 785 F.3d 1128, 1132-33 (6th Cir. 2015); *United States v. Black*, 707 F.3d 531, 540 (4th Cir. 2013); *Stoedter v. Gates*, 704 F. App'x 748, 753-56 (10th Cir. 2017); *United States v. Lewis*, 672 F.3d 232, 240 (3d Cir. 2012); *United States v. Ubiles*, 224 F.3d 213, 217 (3d Cir. 2000); *Duffie v. City of Lincoln*, 834 F.3d 877, 883 (8th Cir. 2016); *Commonwealth v. Hicks*, 208 A.3d 916, 936-37 (Pa. 2019), *cert. denied sub nom. Pennsylvania v. Hicks*, 140 S. Ct. 645 (2019); *Pinner v. State*, 74 N.E.3d 226, 232-34 (Ind. 2017); *Kilburn v. State*, 297 So. 3d

671, 672-76 (Fla. Dist. Ct. App. 2020). Thus, the question becomes what else is required beyond mere gun possession before law enforcement can seize someone who may be lawfully armed.

In addressing this question, the Sixth Circuit noted that this Court already rejected a firearm exception to the Fourth Amendment requirement of individualized suspicion in 2000. *Northrup*, 785 F.3d at 1132 (citing *Florida v. J.L.*, 529 U.S. 266 (2000)). The Pennsylvania Supreme Court also explained that permitting stops based on gun possession alone would mean that lawful gun owners would lose much of their Fourth Amendment right to be free from governmental intrusion. *Hicks*, 208 A.3d at 941-45. Further, both Pennsylvania and Florida courts have compared stopping a citizen to check for a gun permit to stopping a driver to check for a driver's license—a practice that would clearly violate the Fourth Amendment absent additional protections. *Hicks*, 208 A.3d at 941-45; *Kilburn*, 297 So. 3d at 676.

In short, courts are sensitive to balancing the needs of law enforcement and the importance of protecting Fourth Amendment rights. Yet, they are currently reaching both extremes when asked whether police officers are entitled to stop citizens possessing firearms in jurisdictions where such possession may be legal. This division warrants this Court's review.

II. Resolving this question is important to private citizens, law enforcement, and to their communities.

Recent years have shown all too clearly the importance of having guideposts of what is expected of both citizens and law enforcement during interactions in which private citizens may be legally armed. See, e.g., Lou Raguse, *Jurors in Philando Castile Case May Not Hear He Had Gun Permit*, USA Today, May 30, 2017, available at

<https://tinyurl.com/y57rg2vg> (describing how, during a traffic stop, an officer shot and killed a lawful gun owner who informed them of his gun possession and license). Millions of Americans practice their lawful right to carry firearms outside the home. *Kilburn v. State*, 297 So. 3d 671, 676 (Fla. Dist. Ct. App. 2020) (in Florida alone more than 2 million people are licensed to concealed carry); NRA-ILA, Gun Right to Carry Laws, <https://www.nraila.org/gun-laws> (last visited January 19, 2021)(showing that nearly every state allows concealed carry). As legal gun possession rises, it is vital that officers and citizens alike know the constitutional limits on their interactions. Christopher Ingraham, *After San Bernardino, Everyone Wants To Be a 'Good Guy With a Gun'*, Wash. Post (Dec. 10, 2015), <http://tinyurl.com/l6n9d8f> (estimating that permits for concealed carry rose from 4.6 million in 2007 to 12.8 million in 2015).

Police officers need flexibility, but also guidance in order to do their jobs effectively without forcing everyday citizens to choose between their Second and Fourth Amendment rights. The Fourth Amendment promises the necessary flexibility. Under *Terry*, the Fourth Amendment permits brief investigatory stops based on reasonable suspicion in addition to arrests based on probable cause. *Terry v. Ohio*, 392 U.S. 1, 21-27 (1968). But even brief investigatory stops can be humiliating and involve an officer's sensitive fingers tracing the outlines of one's body in public. *Id.* at 17 n. 13, 25. Thus, citizens should know ahead of time whether lawfully carrying a firearm for protection means agreeing to indiscriminate stops and searches by law enforcement.

The current confusion of Fourth Amendment law provides no resolution for the growing tension between lawful gun owners and law enforcement. The inconsistent decisions will serve to make the job of law enforcement more difficult and to impede

their ability to respectfully serve their communities.

III. This case presents an ideal vehicle for resolving the conflict.

This case is free from some of the complicating factors that might hinder this Court's reaching the question presented in other cases where it arises. This case is on direct review, the facts and legal issues were well-developed where the Fourth Amendment issue was fully litigated at a simultaneous hearing and bench trial, and the question presented was briefed by both parties and squarely addressed by the reviewing court below.

This case also offers a typical example of the context in which the Fourth Amendment question presented arises. In cases on both sides of the split, courts have considered this Fourth Amendment question while confronted with arguments by the government pointing to minor circumstances beyond mere gun possession. *Compare People v. Williams*, 731 F.3d 678, 686-87 (7th Cir. 2013) (Seventh Circuit held that neither "alone [n]or together" could the following facts justify the search: that there was a 911 call reporting weapons, that the defendant avoided eye contact with the officers, and "that this all occurred in a high crime area"); *with McMichaels*, 2019 IL App (1st) 163053 at ¶¶ 23-24 (Illinois Appellate Court held anonymous 911 call that a man matching defendant's description had a gun, and his "furtive act" of turning away from officers with hands in pocket justified seizure).

Because *Terry* searches often arise in the context of officers' belief about the individual's gun possession and the government's pointing to other minor factors – such as nervous or allegedly suspicious movements – this case would allow the Court to offer meaningful guidance on the question presented. Thus, this case presents an

excellent opportunity for this Court to analyze the question of how a reasonable suspicion of *illegal* gun possession can arise in states where gun outside the home may be legal.

IV. The published opinion in this case demonstrates how Fourth Amendment principles will be eroded without guidance on the limits of government intrusion into an individual's legal gun possession.

This Court has elucidated that the touchstone for balancing the interests of law enforcement in investigating crime against the interests of private citizens in avoiding government intrusions is reasonable suspicion of criminal behavior. *Terry v. Ohio*, 392 U.S. 1, 20-27 (1968); *Florida v. J.L.*, 529 U.S. 266, 270-72 (2000). In setting the standard of reasonableness, this Court recognized that a forced interaction with the police can be both terrifying and humiliating. *Terry*, 392 U.S. at 24-25. Thus, there must be some objective sign that a citizen was involved in criminal behavior before they should be forced to suffer such a government intrusion. *J.L.*, 529 U.S. at 270-72.

Notably, this Court has considered whether to lessen the burden on police to stop someone suspected of having a firearm due to the deadliness of the instrument. In *J.L.*, this Court specifically eschewed a firearm exception to the requirement of reasonable suspicion. *Id.* at 272-73. In doing so, it held that the Fourth Amendment was violated when the police stopped the defendant based on his matching an anonymous tip that a young black male in a plaid shirt at a certain bus stop had an illegal gun. *Id.* The court explained that a *Terry* stop requires that the police have reason to believe a tipster is giving reliable information on the *criminal* aspect of their tip. *Id.*

In this case, after receiving an anonymous dispatch that a man matching McMichaels' description "had a gun" in the vicinity of 4908 West Ferdinand in Chicago,

three police officers arrived at that location, and immediately ordered McMichaels and the other men with him to put their hands up. Where the officers had no information other than an uncorroborated, anonymous tip of a man with a gun – which is presumptively lawful in Illinois law – there was no reasonable, articulable suspicion of criminal activity to seize McMichaels based on the tip alone. See *J.L.*, 529 U.S. at 271–72. The officers physically restrained McMichaels by the arm when he turned from them and refused their request that he show his hands.

The appellate court concluded that McMichaels was not seized for Fourth Amendment purposes until the officers physically grabbed his arm to restrain him. *McMichaels*, 2019 IL App (1st) 163053, ¶ 32. Therefore, when the police “asked” McMichaels to show them his hands, this interaction remained merely a consensual citizen-police encounter during which time McMichaels’ refusal to comply and his act turning away from the officers should not have been suspicious at all, as he was entirely free to leave. See *United States v. Drayton*, 536 U.S. 194, 206 (2002) (explaining that if a suspect is not seized, then the encounter is consensual, and thus the suspect is “free to refuse” to comply with police requests); *Illinois v. Wardlow*, 528 U.S. at 125 (“[W]hen an officer, without reasonable suspicion or probable cause, approaches an individual, the individual has a right to ignore the police and go about his business”), citing *Florida v. Royer*, 460 U.S. 491, 498 (1983). While noting that the refusal to cooperate with the police “without more” is generally insufficient to give rise to a reasonable suspicion, the appellate court below found the seizure proper because of the additional fact that McMichaels was suspected of carrying a gun, thus “furtive movement” justified the seizure. *McMichaels*, 2019 IL App (1st) 163053 at ¶¶ 24, 32.

This case shows how a fear of firearms and a desire for decisive action may lead courts to erode Fourth Amendment rights when there is an anonymous tip about possible gun possession. As legal gun ownership increases in the wake of a renewed Second Amendment, this Court should clarify how the Fourth Amendment applies when officers wish to speak with an armed citizen. In this case, the initial stop of McMichaels quickly transformed into an arrest without any consideration of whether he had legal possession of the firearm. Thus, it presents a good opportunity to assess the Fourth Amendment analysis as it relates to the public possession of firearms.

CONCLUSION

For the foregoing reasons, petitioner, Deandre McMichaels, respectfully prays that a writ of certiorari issue to review the judgment of the Illinois Appellate Court.

Respectfully submitted,

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