

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

UNITED STATES OF AMERICA)	
)	
vs.)	No. 08 CR 846
)	Honorable Joan H. Lefkow
JON BURGE)	

**DEFENDANT’S RESPONSE TO GOVERNMENT’S
MOTION TO PRECLUDE EXPERT TESTIMONY**

Defendant Jon Burge, by his attorneys, pursuant to Rules 401-403, 701-705 of the Federal Rules of Evidence, responds to the government’s motion to preclude expert testimony. Alternatively, Defendant moves to preclude Richard Michael’s testimony.

Background

The Seventh Circuit has “taken a somewhat more lenient approach to” the admission of expert testimony in criminal cases, *United States v. Romero*, 189 F.3d 576, 586 (7th Cir. 1999), and has often upheld the government’s use of expert testimony. This case portends to traverse a like road, as the government has provided the defense with notice that it may call Professor Richard Michael as an expert.¹ According to the government’s disclosure, Professor Michael would testify about the following subjects, each “legal” in nature:

1. Interrogatories are part of standard discovery in civil proceedings.
2. Answers to interrogatories can be used for a variety of reasons in civil cases, including but not limited to: as a basis to move for summary judgment; impeachment at trial; and, admissions at trial. They can be used to obtain admissible evidence, or to learn of information that can lead to admissible evidence.

¹ The government’s motion says the name of its expert is “Robert Michael.” His name is actually Richard Michael.

3. If defendant's answers to the interrogatories identified in the indictment were false, the false nature of these answers could have significantly impacted the course of the civil lawsuit in *Hobley v. Burge, et al.*, 03 C 3678.
4. Notary publics are routinely used in answering interrogatories in civil discovery. Any statements sworn to be true and signed before a notary public in a civil proceeding are valid, sworn statements of the individual for purposes of that proceeding. Thus, defendant Burge's sworn answer to the interrogatory as alleged in Count Two of the indictment is a sworn statement of the defendant in *Hobley v. Burge et al.*, 03 C 3678.

In response to the government's disclosure, the defendant provided notice of intent to call former Judge Daniel Locallo as an expert to testify, *inter alia*, about the types of topics identified in Professor Michael's putative testimony, *e.g.*, matters relating to civil and criminal litigation. The government does not challenge Judge Locallo's qualifications, nor could it as Judge Locallo is eminently qualified.²

In addition, several of the government's witnesses are/were immersed in the criminal milieu when they were questioned by police. Accordingly, the defendant has also provided notice he intends to call Thomas O'Brien, a former federal agent with vast experience. Based on his experience and knowledge of gang workings, Agent O'Brien will testify that in the early/mid 1980s (the time of most of the interrogations placed in issue), the El Rukn street gang had an edict that members and incarcerated individuals were to fabricate allegations of abuse by Area Two police officers to scuttle criminal charges and attempt to enrich themselves.

Now that the tables have been turned, the government moves to preclude the brunt of Judge Locallo's putative testimony, and all of Agent O'Brien's. The government,

² The government's sarcastic comparisons of Judge Locallo to a "fortune teller" ought to be disregarded. Opinion testimony, by its very nature, may be speculative.

however, does not have a monopoly on the admission of expert witness testimony; the rules of evidence apply equally to both sides. The government's arguments are devoid of merit, and, if accepted, would mean that much of Professor Michael's testimony should likewise be barred.

Argument

I. Judge Locallo

The government agrees that the jury would be assisted by some "technical background testimony regarding civil litigation," and proposes to do so itself. Motion, p. 4. The government nevertheless objects to much of Judge Locallo's proposed testimony. Even though Judge Locallo's testimony will relate to technical aspects of civil and criminal litigation, the government apparently disagrees with his opinions. The government's views are fodder for cross-examination, as opposed to denying Burge the opportunity to present defense evidence.

A. Lack of Screening Process for Civil Lawsuits

The touchstone for admissibility of expert testimony is whether it would be helpful to the trier of fact in understanding the evidence. See, e.g., *United States v. Hall*, 93 F.3d 1337, 1342 (7th Cir. 1996). This is another way of saying that proposed expert testimony must be relevant. Fed.R.Evid. 401. Here, Judge Locallo's proposed testimony to the effect that 1) there is no screening process for the filing of civil lawsuits such as Hobley's, and 2) the filing of a lawsuit does not mean the allegations in the lawsuit are true, is admissible.

First, the indictment makes Hobley's civil lawsuit relevant; interrogatories in Hobley's lawsuit are the basis for each of the charges. Contrary to the government's

position, Judge Locallo's testimony about the lack of a screening process *etc.* is not within the ken of the average juror. The government cites no study, case or other authority to back its claim. It is unlikely that a jury will be predominantly composed of lawyers, judges or persons otherwise trained in the law. Moreover, the lack of a screening mechanism is not universal.³

Defendant will be prejudiced if Judge Locallo is not permitted to testify on this subject. The government has indicated it does not intend to prove Hobley's allegations about "torture." At the same time, Hobley's accusations will be before the jury in the form of the indictment's allegations about the lawsuit, and the interrogatories quoted in the indictment. The Court has ruled these allegations may remain in the indictment notwithstanding the government's lack of intent to prove Hobley's "torture" claims. It is, therefore, essential that the defendant be allowed to educate the jury about the matters identified by Judge Locallo.

B. Notary Publics/Official Proceedings

Rule 704 abolished the prohibition against experts offering opinions on ultimate issues. That "legal" issues may be discussed in expert testimony is not cause to preclude all such testimony:

[The rules] also stand ready to exclude opinions phrased in terms of inadequately explored legal criteria. Thus the question, "Did T have capacity to make a will?" would be excluded, while the question, "Did T have sufficient mental capacity to know the nature and extent of his property and the natural objects of his bounty and to formulate a rational scheme of distribution?" would be allowed. McCormick § 12.

³ For example, until the Illinois Supreme Court's recent decision in *Lebron v. Gottlieb*, 2010 WL 375190 (2010), Illinois had screening mechanisms in place for the filing of medical malpractice lawsuits.

Fed.R.Evid. 704, Advisory Committee Notes. Thus, baseline legal conclusions are inappropriate; explanation of matters surrounding legal issues are not. See, *e.g.*, *United States v. Toushin*, 899 F.2d 617, 620 n. 4 (7th Cir. 1990) (IRS agent's testimony in tax evasion case about when money becomes income was not "an improper legal opinion"); *United States v. Jungles*, 903 F.2d 468, 477 (7th Cir. 1990) (expert opinion that defendant was an "independent contractor" in tax evasion case was excludable, while questions about the defendant's employment status were not); see also *United States v. Van Dyke*, 14 F.2d 415 (8th Cir. 1994) (in bank fraud case, district court erred in barring defense expert, an attorney, from explaining application of regulation at issue).

To be sure, expert testimony on "legal" matters is not entirely free from difficulty. Although not cited by the government, the Seventh Circuit said the following in *dicta* in *United States v. Sinclair*, 74 F.3d 753, 757 n. 1 (1996):

The question is this: when can expert witnesses offer legal opinions? In addressing this question, federal courts have not provided uniform answers. See Note, *Expert Legal Testimony*, 97 Harv.L.Rev. 797 (1984) (discussing the legal controversy over the admissibility of legal opinion testimony). Our own cases have determined that Federal Rules of Evidence 702 and 704 prohibit experts from offering opinions about legal issues that will determine the outcome of a case. That is, they cannot testify about legal issues on which the judge will instruct the jury. See, *e.g.*, *Bammerlin v. Navistar Internat'l Transp. Corp.*, 30 F.3d 898, 900 (7th Cir.1994); *Harbor Ins. Co. v. Continental Bank Corp.*, 922 F.2d 357, 366 (7th Cir.1990). Our cases have also indicated that there are some circumstances in which experts can offer legal opinions, but we have not exhaustively identified them. See, *e.g.*, *Allison v. Ticor Title Ins. Co.*, 979 F.2d 1187, 1196 (7th Cir.1992); *United States v. Baskes*, 649 F.2d 471, 478-79 (7th Cir.1980), *cert. denied*, 450 U.S. 1000, 101 S.Ct. 1706, 68 L.Ed.2d 201 (1981). Not every court has followed this approach, however; and some of their opinions do not clearly determine when experts may and may not testify about legal issues. Compare *Marx & Co., Inc. v. Diners' Club, Inc.*, 550 F.2d 505 (2d Cir.), *cert. denied*, 434 U.S. 861, 98 S.Ct. 188, 54 L.Ed.2d 134 (1977) with *United States v. Bilzerian*, 926 F.2d 1285, 1294-95 (2d Cir.), *cert. denied*, 502 U.S. 813, 112 S.Ct. 63, 116 L.Ed.2d 39 (1991).

Since *Sinclair*, the Seventh Circuit has addressed expert opinions that touch on legal issues. In *United States v. Chube II*, 538 F.3d 693, 700 (7th Cir. 2008), the defendants (medical doctors) were on trial for unlawfully prescribing painkillers and health care fraud. The court of appeals found that the district court did not err in admitting expert testimony (based on review of files) to show that no legitimate medical purpose existed for the prescriptions under the Code of Federal Regulations. The court found that the testimony did not amount to an opinion about the ultimate issue of the defendant's intent. Fortifying this conclusion, were the district court's repeated statements (before the jury) that the court instructed the jury on legality. See also *United States v. Pansier*, 576 F.3d 726, 738 (7th Cir. 2009) (expert testimony from government bank examiner in IRS-related prosecution approved); *United States v. Turner*, 400 F.3d 491, 499 (7th Cir. 2005) (expert's testimony in money laundering conspiracy prosecution that transaction appeared to be structured permissible); *United States v. Owens*, 301 F.3d 521, 526-27 (7th Cir. 2002) (expert's description of appraisal reports in mail/wire fraud case as misleading and fraudulent did not violate Rule 704).

In *United States v. Gladish*, 536 F.3d 649 (7th Cir. 2008), the defendant was convicted of attempting to engage a minor in illegal sexual activity. The court of appeals held that the district court erred in disallowing the "psychologist whom the defendant had hired as an expert witness to testify with respect to the attempt." *Id.* at 650. The court ruled that, while the expert could not testify that the defendant lacked criminal intent, he could testify that the defendant was unlikely to have acted on his intent. The court did

not find the proposed testimony inadmissible on grounds the jury would be given instructions on attempt.⁴

Here, the government is shortsighted about Judge Locallo's proposed testimony. First, the *government* wants Professor Michael to testify about the role of notary publics, including an opinion that statements sworn before a notary public are valid statements "for purposes of that proceeding." The government even wants Professor Michael to testify that Burge's answers were sworn statements in *Hobley v. Burge*. The government's hyperbole notwithstanding, Judge Locallo's putative testimony is not "completely improper." Motion, p. 6. Rather, Judge Locallo's proposed testimony is the other side of the coin put into play by Professor Michael, *e.g.*, that the swearing of an affidavit before a notary public is not a statement in an official proceeding.

In addition, the average juror would lack knowledge about the role of a notary public in relation to an official proceeding. Testimony on this subject is relevant in view of the charges. Expert testimony would assist the trier of fact.

⁴ Cases from the Fourth Circuit are also instructive. In *United States v. Perkins*, 470 F.3d 150 (4th Cir. 2006), the defendant, a police officer, was convicted of violating another's civil rights by using excessive force during an arrest. On appeal, the defendant argued that the district court erred in admitting the expert testimony of Inspector Carter Burnett regarding the reasonableness of the defendant's use of force because it stated a legal conclusion. The court rejected this contention. While the court observed that the issue was not without complications, it held that the expert testimony was not necessarily unhelpful, did not tell the jury what to do and did not supplant the juror's use of common sense. *Id.* at 159. In *United States v. Barile*, 286 F.3d 749 (4th Cir. 2002), the defendant was charged with making materially false statements to the FDA in a 501(k) submission. At trial, the defendant sought to call an expert to testify that the statements in the 501(k) submission at issue were not unreasonable and did not contain material false statements. The district court precluded the defense attempt on grounds that the expert testimony would invade the jury's province and would not be helpful. After reviewing the law, the court of appeals concluded that the district court had the discretion to exclude the expert's testimony regarding materiality, but erred in disallowing testimony about the reasonableness of the 501(k) submission. *Id.* at 762.

Providing the questions are “carefully constructed,” *United States v. Lipscomb*, 14 F.3d 1236, 1242 (7th Cir. 1994), Judge Locallo’s testimony is admissible. Judge Locallo will not be telling the jury what to do, see *United States v. Dazey*, 403 F.3d 1147, 1171-72 (10th Cir. 2005); nor will he be opining that Burge lacked criminal intent, acted lawfully or is not guilty, *Lipscomb*, 14 F.3d at 1242; *United States v. Baskes*, 649 F.2d 471, 478 (7th Cir. 1980). The government is free to challenge Judge Locallo’s testimony through cross-examination. In addition, the jury likely will be instructed on the role of expert testimony (that it is not required to accept it), and that it must follow the law as given by this Court. Judge Locallo’s proposed testimony, therefore, meets the criteria for the admission of expert testimony. See, e.g., *Chube II*, 538 F.3d at 701.

If the Court finds Judge Locallo’s testimony inadmissible, then Professor Michael’s testimony, too, should be barred, and the defendant so moves.

C. Topics Mentioned in the Interrogatories

The language in the interrogatories is much more than an interesting academia – it is directly relevant to the issues in this case. Expert testimony addressing the topics identified in the interrogatories (e.g., deprivation of counsel, access to family, use of handcuffs, photographs and polygraphs during interrogation) would assist the jury.

The average juror does not have knowledge of the distinctions between legitimate and illegitimate interrogation techniques. Police are granted leeway in deceiving a suspect, so long as they do not overcome his free will. *Frazier v. Cupp*, 394 U.S. 731 (1969); *Conner v. McBride*, 375 F.3d 643, 653 (7th Cir. 2004); *United States v. Ceballos*, 302 F.3d 679, 695 (7th Cir. 2002). And how is a juror supposed to know that police may properly withhold information from a suspect? More particularly, the average juror

cannot be expected to know that police have no obligation to inform a suspect that an attorney is seeking him out. See *Moran v. Burbine*, 475 U.S. 412 (1986). The interrogatories quoted in the indictment also asked about use of handcuffs, photographs and polygraphs during interrogation, and created the impression that these techniques are somehow improper when they are not. The proposed expert testimony is designed to provide guidance on these issues. Jurors cannot be left to their own devices to deduce permissible and impermissible interrogation techniques.

The government's argument that Judge Locallo's testimony will lead to "jury confusion" is unconvincing. We also do not propose to have Judge Locallo testify about Burge's state of mind, and he will not testify that Burge lacked criminal intent, or did not commit the charged offenses. *United States v. Lipscomb*, 14 F.3d 1236, 1242 (7th Cir. 1994). Nor do we intend to have Judge Locallo offer baseline legal conclusions. Judge Locallo will simply offer testimony regarding the topics addressed in the language of the interrogatories. That is not outside the realm of permissible expert testimony.

In support of its quest to bar Judge Locallo from testifying on Rule 403 grounds, the government cites *United States v. Doe*, 149 F.3d 634, 637 (7th Cir. 1998). *Doe* actually supports the defendant's position. The Seventh Circuit found no error in the admission of drug courier profile testimony. The court articulated the following factors as relevant to the unfair prejudice analysis:

For instance, if the expert witness was also an eyewitness or otherwise involved in the defendant's arrest, there is a greater danger of unfair prejudice. This dual role may confuse the jury, which may not understand its own function in evaluating the evidence. See *id.* at 453; see also *Solis*, 923 F.2d at 551; *United States v. de Soto*, 885 F.2d 354, 360 (7th Cir.1989). Special cautionary instructions may be warranted in such a case. See *Foster*, 939 F.2d at 453. We have also noted the importance of a full opportunity for cross-examination to explore the validity of the

profile and to suggest possible legitimate explanations for the defendant's conduct. See *Solis*, 923 F.2d at 551.

Applying these factors, the court determined that the testimony did not unfairly prejudice Doe under Rule 403. The same is true here: Judge Locallo is not performing a “dual role,” the jury will be given instructions on use of expert testimony and law coming from the court, and the government presumably will undertake cross-examination.

D. Hobley’s Obligation to Prove His Case/Materiality

The government offers no authority for excluding Judge Locallo’s putative testimony regarding a plaintiff’s obligation to prove his case, and the role of answers to interrogatories if the plaintiff fails to meet this burden. Judge Locallo’s point is background information about the mechanics of a civil lawsuit, which the government concedes may be a useful subject for expert testimony. While the government ascribes defects in Judge Locallo’s assessments, the place for articulation of those claimed defects is in cross-examination.

Furthermore, Judge Locallo’s testimony is offered to counter and clarify Professor Michael’s putative testimony about how answers to interrogatories can be used. The government proposes to have Professor Michael testify on the essential element of materiality, *i.e.*, if Burge’s answers were false, they could have significantly affected the outcome of Hobley’s suit. The defense is entitled to ask the converse of that question, and air the full circumstances of interrogatory use in a civil case – something the average juror does not know.

E. Burge’s Answers Were Not Used in the *Hobley* Case

The indictment expressly charges that the defendant “did corruptly obstruct, influence and impede an official proceeding, and attempt to do so” by signing allegedly

false statements in Hobley's civil suit. Defendant has a right to show that he "did [not] corruptly obstruct, influence and impede an official proceeding." That goes to the heart of the obstruction charges, and easily meets relevancy standards.

Moreover, expert testimony would be helpful on the subject. The jurors cannot be expected to filter through PACER to determine whether the defendant's alleged answers were used. Again, if the government believes Judge Locallo's point is faulty, it may attempt to demonstrate that on cross-examination.

F. Burge's Lack of Involvement in Hobley's Case

Judge Locallo's putative testimony about Burge's lack of involvement in Hobley's case is bound up with his points about the mechanics of a civil case. If Hobley could not establish that Burge was responsible for causing an injury, then Hobley would not be entitled to a judgment against Burge.

Judge Locallo will testify that he has reviewed certain records, and there is no evidence of Burge's involvement in Hobley's interrogation. Again, the jury cannot be expected to sift through the various court opinions, police reports and so on in litigation relating to Hobley. Summary review of this material would be helpful.

G. William Murphy

William Murphy was a defense lawyer for Anthony Holmes, one of the persons listed on the government's list of cases.⁵ Testimony about whether Attorney Murphy would have brought a motion to suppress statements if his client had informed him that he had been tortured may become relevant depending on the content of the government's case. Recently tendered 3500 material includes statements of Holmes' other attorney (Larry Sufferdin), who says that the Special Prosecutor got his statements wrong and that he now remembers Holmes making allegations about police abuse and that a motion to suppress statements may have been brought. If this witness does give such testimony, then Judge Locallo's putative testimony would be relevant. If the government does not offer this testimony, then we will not seek to question Judge Locallo on this subject.

II. Agent O'Brien

A. Qualifications

The government challenges Agent O'Brien's qualifications to testify as an expert. Under Rule 702, a "witness [is] qualified as an expert by knowledge, skill, experience, training, or education." "All you need to be an expert witness is a body of specialized knowledge that can be helpful to the jury." *United States v. Williams*, 81 F.3d 1434, 1441 (7th Cir. 1996). Prior qualification is not a prerequisite, or else no expert could ever be qualified. See *United States v. Locascio*, 6 F.3d 924, 937 (2nd Cir. 1993) ("Although he had never before been qualified as an expert witness, even the most qualified expert must have his first day in court.").

⁵ Defendant's notice mistakenly stated that Murphy represented Leonard Hinton.

Agent O'Brien is qualified to give opinion testimony. He served as an ATF agent for over 30 years. Prior to his stint with the ATF, he was an IRS agent, assigned to the Criminal Investigation Division. He has previously testified in district court, although not as an expert. In the 1980s, he supervised gang-related wiretaps.

B. Content of Testimony

The reality of this case is that some of the government's witnesses were affiliated with gangs around the time of their interrogations. Agent O'Brien's testimony is simple: it was part of gang methods and operations that arrested persons should fabricate allegations about police officers to get out from under criminal charges, and enrich themselves through civil cases. Agent O'Brien's testimony is based on personal knowledge, having supervised a wiretap in which this edict was discussed. (Defendant will also connect certain government witnesses to knowledge of this directive.)

The subject matter of Agent O'Brien's testimony is uncontroversial in terms of expert testimony. In case after case, the Seventh Circuit has approved expert testimony about criminal operations and methods.⁶ As stated in *United States v. Mansoori*, 304

⁶ See, e.g., *United States v. Are*, 590 F.3d 499, 511-15 (7th Cir. 2009) (even though government agent/expert's testimony about coded language was strong circumstantial proof of the defendants' *mens rea*, it did not violate Rule 704(b)); *United States v. Winbush*, 580 F.3d 503, 511-12 (7th Cir. 2009) (expert may testify about facts permitting the inference that the defendant intended to distribute drugs without violating Rule 704); *United States v. Morris*, 576 F.3d 661, 673-75 (7th Cir. 2009) (surveying cases and law regarding expert testimony and finding no error in the admission of the government's expert's testimony in a drug case); *United States v. Blount*, 502 F.3d 674, 679-80 (7th Cir. 2007) (district court did not plainly err in allowing expert to testify that gun found on defendant's bed was used to further illegal drug activities); *United States v. Glover*, 479 F.3d 511 (7th Cir. 2007) (expert's testimony about practices of street-level drug dealers did not run afoul of Rule 704); *United States v. Love*, 336 F.3d 643, 646-47 (7th Cir. 2003) (expert properly testified to role of third parties at drug transactions); *United States v. Romero*, 189 F.3d 576, 582-87 (7th Cir. 1999) (expert's testimony about characteristics and methods of child molesters did not violate expert witness rules); *United States v.*

F.3d 635, 654 (7th Cir. 2002), “The average juror is unlikely to be familiar with the operations of ... street gangs.” This case is no different. Surely the standards for admission of expert testimony cannot be different when the defendant is the proponent of the evidence.

Finally, the subject matter of Agent O’Brien’s testimony does not require a hearing pursuant to *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 F.3d 579 (1993). The Seventh Circuit has rejected the proposition that gang expert testimony requires a *Daubert* hearing. *Williams*, 81 F.3d at 1441-42 (“This is not a case in which scientific evidence is tendered, and the question is whether it is real science or junk (courtroom) science ... You don't have to be a scientist or use the methodology of science, or even be an honest, decent, law-abiding citizen, in order to possess specialized knowledge about a criminal activity.”).

III. The Government’s Motion Should Be Denied Outright, Or, In The Alternative, A *Voir Dire* Should Be Held

For the reasons stated above, the government has failed to make a case for excluding the expert testimony proposed by the defense. If the government’s present

Hubbard, 61 F.3d 1261, 1274 (7th Cir. 1995) (expert’s testimony about cocaine trade in Chicago and drug dealer methods never came close to constituting opinions on ultimate issue); *United States v. Willis*, 61 F.3d 526, 532-33 (7th Cir. 1995) (testimony of expert that he had never participated in a case in which a drug courier did not know what he was carrying did not violate Rule 704(b)); *United States v. Lipscomb*, 14 F.3d 1236, 1241-43 (7th Cir. 1994) (expert’s testimony that cocaine found in the defendant’s possession was a distribution amount did not invade the province of the jury); *United States v. Brown*, 7 F.3d 648, 652 (7th Cir. 1993) (same; surveying the wide array of subjects that law enforcement experts have testified about); *United States v. Foster*, 939 F.2d 445, 451 (7th Cir. 1991) (“[t]his circuit ... is quite familiar with the use during trial of expert testimony as the methods used by drug dealers”).

motion is not denied outright, then the Court should conduct a *voir dire* for any expert called by either side.

IV. Motion to Exclude Professor Michael's Testimony

If the Court excludes Judge Locallo's testimony, then Defendant objects to, and moves to preclude, the following testimony from Professor Michael:

- If defendant's answers to the interrogatories identified in the indictment were false, the false nature of these answers could have significantly impacted the course of the civil lawsuit in *Hobley v. Burge, et al.*, 03 C 3678.
- Any statements sworn to be true and signed before a notary public in a civil proceeding are valid, sworn statements of the individual for purposes of that proceeding. Thus, defendant Burge's sworn answer to the interrogatory as alleged in Count Two of the indictment is a sworn statement of the defendant in *Hobley v. Burge et al.*, 03 C 3678.

Respectfully submitted,

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