

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

UNITED STATES OF AMERICA)	
)	
vs.)	No. 08 CR 846
)	Judge Joan Humphrey Lefkow
JON BURGE)	

**DEFENDANT’S MOTION FOR CHANGE OF VENUE
DUE TO PREJUDICIAL PRETRIAL PUBLICITY**

Defendant JON BURGE, by his attorneys, pursuant to Rule 21(a) of the Federal Rules of Criminal Procedure, and the Fifth and Sixth Amendments to the United States Constitution, respectfully moves this Honorable Court to enter an order changing the venue to a district outside the Northern District of Illinois. In support of this motion, the following is offered:

1. Venue should be changed to a district outside the Northern District of Illinois due to the pervasive, prejudicial pretrial publicity about Defendant Jon Burge.
2. In support of this motion, the attached memorandum of law is offered.

Respectfully submitted,

/s/ Marc W. Martin

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