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ILLINOIS STATE BAR ASSOCIATION

Criminal Justice

The newsletter of the Illinois State Bar Association's Section on Criminal Justice

Editor's note

By Hon. Gregory Paul Vazquez, Fourth District Municipal Court of Cook Count

We would like to thank our council members Hon. Donald Bernardi, Mark Kevin Wykoff, Sr., Diana Lesik, and Prof. Kim D. Chanbonpin and Blair J. Pooler for their contributions to this issue. In this issue we have included Case Notes discussing *People v. Aguilar* and *People v. Burns,* regarding the Aggravated Unlawful Use of Weapons statute. We will continue to follow the appellate decisions in order to provide guidance as to future issues that may arise in this area of the law. ■

Case notes

Class 4 form of aggravated unlawful use of weapons is ruled unconstitutional on its face. Possession of handguns by minors falls outside of the scope of second amendment protection

In *People v. Aguilar*, 2013 IL 112116, the Illinois Supreme Court considered Second Amendment challenges to two statutes: (1) the Class 4 form of the aggravated unlawful use of a weapon (AUUW) statute under 720 ILCS 5/24-1.6(a)(1), (a)(3)(A), (d) (West 2008); and (2) the unlawful possession of a firearm (UPF) by minors under 720 ILCS 5/24-3/1(a)(1) (West 2008).

At trial, the evidence showed that the defendant was seventeen years old when the police arrested him in the backyard of a friend's house. The arresting officer testified that he watched the defendant walk into the backyard and saw a gun in the defendant's right hand. The defendant then dropped the gun to the ground. The loaded gun was recovered and the serial number had been scratched off. The defendant testified that he had not been carrying a gun, but in weighing the credibility of the witnesses, the trial court found the defendant guilty of both charges. The appellate court affirmed the conviction, with one dissent. The Illinois Supreme Court granted leave to appeal.

A. Standing

First, the Court addressed the State's argument that the defendant did not have standing to raise the Second Amendment challenge. The Court held that, because the defendant was arguing that the statutes as a whole were facially invalid, he was not required to demonstrate that he had a personal right to possess the illegally modified handgun on another person's property to have standing.

B. Class 4 form of AUUW

After addressing the standing issue, the Supreme Court concluded that the AUUW statute amounted to a comprehensive ban on carrying guns outside of the home, which, after the United States Supreme Court's decisions in *District of Columbia v. Heller*, 554 U.S. 570 (2008) and *McDonald v. City of Chicago*, 130 S. Ct. 3025 (2010), could not be upheld.

In reaching its decision, the Court addressed the unwavering opinions of the appellate courts of Illinois, which had consistently held that the Class 4 form of AUUW passed constitutional muster. The appellate courts previously reasoned that the core holding of both *Heller* and *McDonald* was that "the Second Amendment protects

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the right to possess a handgun *in the home* for the purpose of self-defense." *Aguilar*, ¶ 18 (quoting *McDonald*, 130 S. Ct. at 3050). Under the reasoning of *Heller* and *McDonald*, because the Class 4 form of AUUW at issue prohibits the possession of operable handguns outside the home, it would not violate the Second Amendment.

The Court found the reasoning of the United States Court of Appeals for the Seventh Circuit in *Moore v. Madigan*, 702 F.3d 933 (7th Cir. 2012) more persuasive. The *Moore* court determined that the Second Amendment "right of the people to keep and bear Arms" recognized under *Heller* and *McDonald* was not limited to the confines of one's home. The right to "keep arms" and the right to "bear arms" are separate and distinct, and to limit the right to bear arms only to one's home would be "awkward usage." In the words of the Seventh Circuit: "A right to bear arms thus implies a right to carry a loaded gun outside the home." *Id.* at 936.

The Illinois Supreme Court left open the possibility, however, that other meaningful regulation of the right to possess and use a firearm outside of the home might survive constitutional scrutiny. Nevertheless, because the Court read the statute as a "wholesale statutory ban on the exercise of a personal right that is specifically named in and guaranteed by the United States Constitution," it had no choice but to find that the statute violated Second Amendment guarantees. Therefore, the Court reversed the defendant's conviction for the Class 4 form of AUUW.

C. UPF conviction

Next, the Court considered the defendant's argument that "because Illinois' ban on handgun possession by 17-year-olds regulates conduct that traditionally falls within the protection of the second amendment, the validity of the law depends on the government's ability to satisfy heightened scrutiny." *Aguilar*, ¶ 25. The defendant argued that, at the nation's founding, many colonial militias required those as young as fifteen to bear arms. Because of this history, the defendant argued, Illinois's flat ban on the ability of individuals under 18 years of age to possess any firearms was violative of the Second Amendment. The Court rejected the defendant's argument.

The Court reasoned that, contrary to the defendant's history-based argument, "laws banning the juvenile possession of firearms have been commonplace for almost 150 years and both reflect and comport with a 'longstanding practice of prohibiting certain classes of individuals from possessing firearms—those whose possession poses a particular danger to the public.'" *Aguilar*, ¶ 27 (quoting *United States v. Rene E.*, 583 F.3d 8, 15 (1st Cir. 2009)). The right to keep and bear arms is not an unlimited right, and the age restriction imposed by the UPF statute is a reasonable regulation of that right.

Therefore, the Court affirmed the defendant's conviction under the UPF statute.

D. Dissenting opinions

The Illinois Supreme Court's decision in *Aguilar* was modified upon a denial of the State's motion to rehear the case, and both Chief Justice Garman and Justice Theis filed separate dissenting opinions upon the denial of rehearing.

Chief Justice Garman would have preferred to rehear the case to allow the State to brief arguments regarding the constitutionality of the remaining sub-sections of the AUUW statute, in particular those sub-sections limiting the ability of convicted felons to carry firearms.

Justice Theis disagreed with the majority's holding that the AUUW statute is facially unconstitutional as it applies to the Class 4 form of the offense. She expressed concern that this holding wrongly conflated the concept of the elements of an offense with the factors relevant to sentence enhancement. *Aguilar*, ¶ 45. When a court declares a statute facially unconstitutional, this means that it is unconstitutional in all its applications, not merely for a "Class 4 form" of the offense. Justice Theis feared that this distinction will prove cumbersome, and wondered how law enforcement will "handle a situation where an offense has been found to be unconstitutional, but only as to a particular class of the offense[.]" *Id.* at ¶ 46. Based on the majority's holding, Justice Theis said that the Class 2 form of AUUW could potentially remain enforceable.

—Prof. Kim D. Chanbonpin
and Blair J. Pooler
The John Marshall Law School
Cook County

The offense of aggravated unlawful use of a weapon by a felon (class 2) is constitutional

In *People v. Edward Burns, 2013 IL App (1st) 120929,* the First District of the Illinois Appellate Court considered the constitutionality of the aggravated unlawful use of a weapon statute found at 720 ILCS 5/24-1.6(a)(1),(a)(3)(A). (Hereafter AUUW). Chicago police officers were on patrol when they were dispatched to a report of gunfire near 73rd street and Blackstone. The officers found three people entering a Nissan Maxima in the vicinity of the gunfire location and parked their squad in front of the car. As officers exited their car, the defendant Edward Burns left the Nissan holding a handgun. Burns ignored an order to put his hands up and ran, after tossing the handgun into the car. The officers chased Burns and recovered a magazine clip that he dropped while fleeing. The officers then recovered the gun from the Nissan. The clip fit the gun recovered from the Nissan. At trial, the state introduced two certified copies of convictions for Burns, one for possession of a controlled substance and one for AUUW. The defendant was thereafter convicted of AUUW, a class 2 offense, based on a prior felony conviction, and sentenced as a class X offender. The defendant appealed.

While the appeal was pending, the Illinois Supreme Court decided *People v. Aguilar,* 2013 IL 112116, 2013 WL 6798167, holding that the class 4 version of the AUUW statute is in violation of the Second Amendment and unconstitutional. The defendant then raised the unconstitutionality of his conviction for AUUW when the appellate court permitted supplemental briefing regarding the impact of *Aguilar.*

In its decision, the First District of the Illinois Appellate Court, noted that the sole issue in the case was whether or not 720 ILCS 5/24-1.6(a)(1),(a)(3)(A), (d) violates the second amendment of the United States Constitution. The defendant relied on the *Aguilar* ruling suggesting that his conviction was also unconstitutional. The State argued that *Aguilar* does not apply because he was found guilty of the class 4 offense and Mr. Burns was convicted of the class 2 offense which was enhanced for having a prior conviction.

The First District noted that the Supreme Court has modified the *Aguilar* decision. In the modified decision, the Court repeatedly referred to the "class 4 form of the offense" as unconstitutional. The modified ruling thus left open the issue that the class 2 form of the offense could remain enforceable. In order to resolve the constitutionality of the class 2 form of the offense the Illinois Appellate Court once again reviewed

the *Aguilar* decision. The court noted that in *Aguilar* the Supreme Court noted that regulations regarding the second amendment may include, "longstanding prohibitions on the possession of firearms by felons and the mentally ill…"*Aguilar,* 2013 IL 112116, *¶ 26 (quoting District of Columbia v. Heller,* 554 U.S. 570, 626–27, 128 S.Ct. 2783, 171 L.Ed.2d 637 (2008)). In addition, the appellate court noted that the Supreme Court recognized as well the longstanding prohibition of the possession of handguns in public buildings like schools, and the ban on the possession of such weapons by juveniles. These restrictions on the use of firearms are part of the history noted by the Supreme Court which has been recognized by the United States Supreme Court. Accordingly, the first district concluded that the AUUW statute charged in this case is indeed "outside the scope of the second amendment's protection." Therefore, the decision of the Circuit Court of Cook County finding the class 2 form of the AAUW statute constitutional was affirmed.

—Hon. Donald Bernardi
McLean County

Criminal act was the product of tourette's syndrome and thus involuntary

In *People v. Nelson,* 2013 IL App (3d) 120191 (December 19, 2013), Defendant Robert Nelson, who had been diagnosed with Tourette's syndrome and obsessive compulsive tendencies decades earlier was charged with four counts of telephone harassment. He proceeded to a bench trial, at which he presented uncontroverted expert testimony that he made the phone calls as part of a complex "tic" due to his Tourette's syndrome and that he had no ability to control these tics. The trial judge found defendant guilty and sentenced him to three concurrent six-year terms in the Department of Corrections. Defendant appealed, arguing that the evidence was insufficient to prove beyond a reasonable doubt that he performed a voluntary act sufficient to result in criminal liability or to prove that he had the mental state required to commit the offense. The Third District Appellate Court agreed with the defendant on appeal, and reversed.

The pertinent facts were as follows: on the evening of March 27, 2010, Nelson made a telephone call to Lois Miller, an 84-year-old resident of Sterling, Illinois. Nelson and Miller had never met, Nelson having picked her name and number out of the phone book at random. When Miller answered the phone, Nelson said "Lois, what are you doing?" She did not recognize his voice, but asked him what he was doing. He said, "[O]h, I'm just sitting here pulling it off." The call frightened and offended her, so she hung up the phone.

On the morning of April 11, 2010, Nelson called Miller again. When she answered, she recognized the voice from the previous call. Nelson said that he "was Ted Long calling from Victoria's Secret." He said that Miller had "won a prize," and "that the prize was a beautiful padded *** bra and panty set." Nelson asked for her underwear sizes so he could send the right-sized prize. Miller, again finding the call embarrassing and offensive, hung up. Miller then contacted the police department. An officer advised her to set up a "trap and trace" to discover the caller's phone number if he called again. Miller then contacted her phone provider to do just that.

Nelson called Miller once again on the evening of April 26, 2010. She recognized the voice as the same as the one as the previous two calls. Nelson asked Miller to go out on a date with him. She refused and slammed the phone down, but he immediately called back and told her his name was Rob. He said, "Lois, I'm going to level with you. A friend of mine gave me your picture, and I thought you were the most beautiful woman in Sterling, and I want to get a date around May 7th or 8th." Miller stayed on the phone long enough to trace the number, and then hung up.

The next day, the police received information from Miller's phone provider regarding the number from which Miller was called. They discovered the number belonged to Nelson. Miller was asked to come to the police station and a call was then placed to Nelson's number from the station. The man who answered identified himself as Nelson. Miller recognized Nelson's voice as that of the man who had called her on the prior occasions. Nelson was asked to come to the police station, and when he did so, he was arrested. On April 30, 2010, the State charged Nelson with four counts of telephone harassment.

At trial, Nelson testified on his own behalf. He was 37 years old, lived with his parents. He was unemployed and collecting disability. He had been diagnosed with Tourette's syndrome and obsessive compulsive disorder (OCD) when he was around 10 years of age. One of the manifestations of these disorders was that he obsessed with certain actions,

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such as repetitively locking doors or using the telephone. He also experienced motor tics, over which he had no control. Some of his motor tics were simple, such as kicking his arms or legs. Others were complex, such as touching a hot stove or locking a door. Nelson experienced verbal tics as well, which he stated were also involuntary. One verbal tic was simple: Nelson would say "feet" repeatedly. (Throughout the trial, the court reporter transcribed many instances of Nelson saying feet, both while other witnesses were testifying and while he was testifying himself. Nelson's outbursts occurred with varying frequency throughout the trial and were reflected on numerous pages of the trial transcript.) He also testified that he would involuntarily utter obscenities and racial slurs, and that he would even speak full sentences as part of his complex vocal tics. Nelson also stated that he experienced "premonitory urges," related to his OCD, which were urges to perform a motor activity. If he did not then perform the activity related to the premonitory urge, he would experience anxiety and panic, sometimes to the point of throwing up. Nelson also testified that he was taking medication for his OCD, and that it was helping, although it did not completely eliminate his symptoms. While he was on medication during the trial, he had ceased taking it at the time of the offenses at dispute. Nelson further admitted that he made the phone calls to Miller, having picked her name and number out of the phone book at random. He denied that he called her with the intent to offend, abuse, or harass her, but admitted during cross-examination that he knew the statements would scare or offend an elderly woman. He testified he felt awful after making the calls, and he knew it was not right to say what he said, but that he could not control his behavior.

Doctor Martin Fields, who had been Nelson's treating psychiatrist since 2009, testified as an expert in the field of psychiatry. He stated that Nelson's predominant diagnosis was for Tourette's disorder with obsessive compulsive symptoms. Dr. Fields testified that Nelson was prescribed a number of medications for his disorders. Dr. Fields stated that Nelson, due to his Tourette's with obsessive compulsive symptoms, experienced both simple and complex motor tics. Dr. Fields further testified that it was common for patients with Tourette's disorder to perform complex actions under the influence of the tic, stating that the tics resulted in a "complex action that occurs as a result of some kind of *** brain activation that we don't yet understand." One action that Nelson performed frequently was making phone calls, and he was obsessed with the phone. Dr. Fields opined that Nelson's behavior in calling Miller would be part of a tic action called coprolalia related to his Tourette's. According to Dr. Fields, calling a victim and saying "I'm just sitting here pulling one off" would be due to coprolalia, as would calling her and saying that he was a representative of Victoria's Secret, or calling to ask for a date. On subsequent cross-examination, Dr. Fields stated that, for Nelson, picking up the phone and dialing it, or even looking up a person's phone number in the phone book, were due to uncontrollable tics. He also testified that it would be part of the coprolalia for Nelson to call the same person on multiple occasions; saying that it was common for patients with Tourette's to repeat the same type of action under similar circumstances, although he could not explain why. According to Dr. Fields, Nelson was not capable of controlling his tics without medication. After Nelson was arrested, however, he told Dr. Fields that he was not taking his medication at the time he made the phone calls to Miller.

After Dr. Fields testified, the defense rested. The State did not present any rebuttal evidence. The State argued the evidence was sufficient to demonstrate that Nelson knowingly made the phone calls to Miller, and did so knowing it was wrong. The State further argued that Nelson's disease did not constitute an excuse for his criminal behavior; rather, he was similar to a drug addict who argues that he or she should be excused because of their addiction.

The defense, on the other hand, argued that the State failed to prove beyond a reasonable doubt that Nelson intended to harass or offend Miller, and that the calls resulted from involuntary actions.

The trial court ruled that the State proved, beyond a reasonable doubt, that Nelson made the calls and that the statements he made contained indecent, lewd, harassing, or abusive language. The question for the court then became whether the nature of Nelson's disability precluded a finding that he made the calls intentionally, or whether Nelson's actions were "under his control." The court stated that it was "incredible for this court to understand" that Nelson's behavior of choosing a number, dialing the phone, and making the lewd statements was all part of a complex tic action, however, "[a]s incredible as that seems to the Court, I do have to accept it because it came from the expert testimony of our expert***. I don't have any expert from the State saying well that isn't part of a complex tic." On the other hand, the court pointed out that despite the fact that his medication seemingly stopped the tics, Nelson stopped taking his medication prior to making the calls. The court stated that Nelson "cannot rely upon his disease as an excuse for his uncontrolled or involuntary acts," because Nelson knew that he had problems with tics and making phone calls, but he did not take medication to prevent them. It concluded that Nelson's "failure without excuse to remain on his treatment does not rise to the level of a defense." Accordingly, the court found Nelson guilty of telephone harassment. The court then sentenced Nelson to three concurrent terms of six years in the Department of Corrections.

Nelson filed a timely notice of appeal and raised two arguments challenging his conviction. First, he argued that the evidence presented at trial did not support a finding, beyond a reasonable doubt, that he performed voluntary acts when he made the phone calls to Miller. Second, he argued that the evidence did not support the conclusion that he intended to offend or harass, abuse, or threaten Miller by making the calls.

In analyzing those contentions, the appellate court noted that as with common law crimes, in Illinois, a criminal offense requires that the defendant perform a prohibited act (the *actus reus*) with the prescribed mental state (*mens rea*), except for certain absolute liability offenses, which require no mental state.

The court also reasoned that in addition to proving that the defendant performed the *actus reus* with the requisite *mens rea*, the State is also required to prove beyond a reasonable doubt that the defendant engaged in a voluntary act, for it is a fundamental principle that a person is not criminally responsible for an involuntary act.

The court then noted that in *People v. Grant*, 71 Ill.2d 551 (1978), the Illinois Supreme Court previously discussed the voluntary act requirement in the context of the defense of automatism. The *Grant* court stated: "Certain involuntary acts, *i.e.*, those committed during a state of automatism, occur as bodily movements which are not controlled by the conscious mind. A person in a state of automatism lacks the volition to

control or prevent the involuntary acts. Such involuntary acts may include those committed during convulsions, sleep, unconsciousness, hypnosis or seizures. [Citations.] A cornerstone of the defense of involuntary conduct is that a person, in a state of automatism, who lacks the volition to control or prevent his conduct, cannot be criminally responsible for such involuntary acts." *Grant*, 71 Ill. 2d. 558.

Now guided by the above, and turning to the case at bar, the appellate court agreed with Nelson's argument that the uncontroverted evidence presented at trial could not support a conclusion that he acted voluntarily when he made the phone calls to Miller. It was undisputed that Nelson actually made the calls in question, but the expert testimony of Dr. Fields, along with Nelson's own testimony, demonstrated that the phone calls were not acts done under Nelson's conscious control. Moreover, and significant was the fact that the State did not present a rebuttal expert to testify that Nelson's actions were voluntary, or to otherwise refute any of Dr. Fields' testimony. Thus, the evidence in the instant cause demonstrated that Nelson acted pursuant to an involuntary tic when he made the calls in question, thereby absolving him of criminal liability.

The Court, however, was keen to admonish that its holding should not be interpreted as stating that as a matter of law acts performed pursuant to complex tics by persons with Tourette's disorder are always involuntary. Whether an act is voluntary should be determined based on the facts of each particular case and the evidence presented at trial.

—Mark Kevin Wykoff, Sr.
Wykoff Law Office, LLC
Springfield

Trial court not required to admonish defendant on right to bench trial and statement by child victim was admissible because it was made during an ongoing emergency

In *People v. James J. Brown*, 2013 IL App (2d) 110327, the Second District of the Illinois Appellate Court, upheld the conviction of James J. Brown, who was convicted of two counts of felony domestic battery. One of those counts alleged he committed the offense by throwing milk in the face of his five year old stepson, and the other count alleged he pushed over a chair in which the stepson was sitting.

On appeal, Brown alleged that the trial court made two errors.

The first error he alleged was that he did not specifically waive his right to a bench trial. He argued that waiver of a bench trial should be given the same stature as waiver of a jury trial, which must be knowingly, intelligently and voluntarily done on the record and in writing.

The appellate court stated that there was no rule, case or statute supporting his argument, and decided that Defendant's analogy to the procedure used to waive a jury trial was not compelling because "a jury trial is the norm for a felony case and a bench trial is the exception; therefore a defendant who wished a bench trial instead of a jury trial must make his position known to the trial court if his attorney fails to do so," citing *People v. Powell*, 281 Ill.App.3d 68, 72-73 (1996).

The Second District quoted the Illinois Supreme Court case of *People v. Smith*, 176 Ill. 2d. 217, 235 (1997), in which that court discussed why a trial court need not admonish a defendant regarding his right to testify, and concluded that some of those reasons apply to this situation as well—such as, if the court advised the Defendant that he has the right *to* testify, it might influence him to waive his right *not* to testify, or the possibility that such advice would impinge upon the attorney—client relationship or introduce error into the trial.

Defendant's second argument was that the trial court had violated *Crawford v. Washington*, 541 U.S. 36 (2004). The rule in *Crawford* is that testimonial hearsay is not admissible unless the declarant is unavailable and the defendant had a previous opportunity to cross–examine the declarant. The question then becomes what is a "testimonial" statement. "Generally a statement is considered testimonial if it is solemn and intended to establish some fact, like the testimony of a witness at trial who is recounting past events." (*Brown, supra* at 7)

Defendant's wife testified that she was not in the room when Defendant pushed over the child's chair, but she heard a "thump" sound and when she went into the room, the child said that daddy pushed him. This statement was made to her while all involved were at the home and immediately after the mother heard the noise. She also established that the child considered Defendant to be his "daddy."

Defendant objected to this testimony on the grounds that it was hearsay, however, the trial court ruled otherwise and found the statements admissible. Because the child's statement was intended to meet an ongoing emergency, namely; whether two incidents of domestic battery were committed, it did not meet the hearsay criteria of solemnity and establishment of a fact. As a result, on appeal, the appellate court affirmed the ruling of the trial court.

—Diana Lenik
Law Office of Diana Lenik
Champaign County ■

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Tuesday, 3/4/14- Live Studio Webcast—Criminal Dispositions Without a Conviction! Presented by the ISBA Committee on Corrections and Sentencing. 3:30-4:30.

Tuesday, 3/4/14- Teleseminar—Employment Agreements, Part 1. Presented by the Illinois State Bar Association. 12-1.

Wednesday, 3/5/14- Teleseminar—Employment Agreements, Part 2. Presented by the Illinois State Bar Association. 12-1.

Thursday, 3/6/14- Webinar—Advanced Tips to Fastcase Legal Research. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 1:00.

Thursday, 3/6- Friday, 3/7/14- Chicago, ITT Chicago-Kent School of Law—13th Annual Environmental Law Conference. Presented by the ISBA Environmental Law Section. 8:30-4:45 with reception from 4:45-6; 8:30-1:30.

Tuesday, 3/11/14- Webinar—Boolean (Keyword) Searches on Fastcase. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 1:00

Tuesday, 3/11/14- Live Studio Webcast—Game On- What's Happening in the Illinois Gaming World. Presented by the ISBA Local Government Section. 11-1.

Tuesday, 3/11/14- Live Studio Webcast—Municipal Animal Ordinances. Presented by the ISBA Animal Law Section. 2-4.

Tuesday, 3/11/14- Teleseminar—Planning with Special Needs Trusts. Presented by the Illinois State Bar Association. 12-1

Thursday, 3/13/14- Chicago, ISBA Chicago Regional Office—Litigating, Defending, and Preventing Employment, Housing and Public Accommodation Discrimination Cases: Practice Updates and Tips Concerning the Illinois Human Rights Act. Presented by the ISBA Human Rights Section; co-sponsored by the ISBA Labor and Employment Section. 9-4.

Thursday, 3/13/14- Live Webcast—Litigating, Defending, and Preventing Employment, Housing and Public Accommodation Discrimination Cases: Practice Updates and Tips Concerning the Illinois Human Rights Act. Presented by the ISBA Human Rights Section. 9-4 (morning, afternoon or full session offered).

Thursday, 3/13/14- Teleseminar—Diligence in Business Transactions. Presented by the Illinois State Bar Association. 12-1.

Friday, 3/14/14- Fairview Heights, Four Points Sheraton—Spring 2014 DUI & Traffic Law Conference. Presented by the ISBA Traffic Law Section. All Day.

Friday, 3/14/14- Chicago, ISBA Chicago Regional Office—Medical Malpractice Seminar. Presented by the ISBA Tort Law Section. 8:30-4:30.

Tuesday, 3/18/14- Live Studio Webcast—City Dogs- Dog Complaints, Shootings & Other Issues Arising in Urban Environments. Presented by the ISBA Animal Law Section. 2-4.

Tuesday, 3/18/14- Teleseminar—"Crowd-funding" in Business Ventures: Raising Capital from the Public. Presented by the Illinois State Bar Association. 12-1.

Thursday, 3/20/14- Teleseminar—Employment Law Torts in the Workplace. Presented by the Illinois State Bar Association. 12-1.

Friday, 3/21/14- DeKalb, Northern Illinois University—From Myra Bradwell to Us: Rise Up and Reach Back. Presented by the ISBA Committee on Women and the Law. 3-5pm program; 5-7 reception.

Tuesday, 3/25/14- Chicago, ISBA Chicago Regional Office—Master Series: The Cybersleuth's Guide to the Internet: Super Search Engine Strategies and Investigative Research. Presented by the Illinois State Bar Association. All day.

Tuesday, 3/25/14- Live Webcast—Master Series: The Cybersleuth's Guide to the Internet: Super Search Engine Strategies and Investigative Research. Presented by the Illinois State Bar Association. 9-4:15

Tuesday, 3/25/14- Teleseminar—Designing and Drafting GRATS in Estate Planning. Presented by the Illinois State Bar Association. 12-1.

Wednesday, 3/26/14- Teleseminar—LIVE REPLAY: Joint Ventures in Business, Part 1. Presented by the Illinois State Bar Association. 12-1.

Thursday, 3/27/14- Teleseminar—LIVE REPLAY: Joint Ventures in Business, Part 2. Presented by the Illinois State Bar Association. 12-1.

Friday, 3/28/14- Chicago, ISBA Chicago Regional Office—Master Series: The Uniform Commercial Code Made Easy: A Groundbreaking Approach to Incorporating the UCC into Your Practice. Presented by the Illinois State Bar Association. All day.

Friday, 3/28/14- Live Webcast—Master Series: The Uniform Commercial Code Made Easy: A Groundbreaking Approach to Incorporating the UCC into Your Practice. Presented by the Illinois State Bar Association. All day.

Friday, 3/28/14- Quincy, Quincy Country Club—General Practice Update 2014: Quincy Regional Event. Presented by the ISBA General Practice Section; co-sponsored by the Adams County Bar Association. 8:15am-5pm.

April

Tuesday, 4/1/14- Teleseminar—Planning and Drafting Revocable Trusts. Presented by the Illinois State Bar Association. 12-1.

Thursday, 4/3/14- Chicago, ISBA Chicago Regional Office—Exempt Offerings: Regulation D to Crowdfunding. Presented by the Business and Securities Law Section. 9-11:30am. ■

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