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THE PUBLIC SERVANT

The newsletter of the Illinois State Bar Association's Standing Committee on Government Lawyers

The new age of privacy: A surprising amount of personal information may already be available to prosecutors

By Patrick T. Driscoll and Douglas N. Marsh

Within the past week, you have likely told somebody what time you leave home in the morning, what route you take to get to work, how long it takes you to arrive, and how long you stay. If you took an extra long lunch break one day, sent a few text messages to friends or family, or made a quick stop somewhere on the way home, you probably told somebody about that, too, even if you never actually said a word about any of that to anybody. Thanks to the staggering amount of information your cell phone generates, collects, stores, and transmits, even when you aren't using it, silence has never been more deafening.

What's more, depending on how courts respond to these new ways of gathering information, any of this information could be used against you in a court of law.

Modern phones not only connect callers, but transmit and store information in the form of text messages and e-mails. Social media applications tell anonymous data compilers about your interests and identify your friends and family. By analyzing data transmitted to nearby cell phone towers, law enforcement officials can locate a cell phone and trace its movements over time, and more recent GPS technology, which has become increasingly commonplace, has further refined location capabilities to pinpoint accuracy.

These recent technological innovations have already proven to be a boon for prosecutors. In *People v. Leak*, 398 Ill.App.3d 798 (2010), for example, the prosecuting State's Attorney confronted a defendant who claimed that he had been at his girlfriend's home, 50 blocks away from the scene of the crime, with cell site records showing

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Did you get a new iPhone or iPad for Christmas?

By Honorable Steven L. Nordquist

Hey -- did you get that new iPhone or new iPad that you've been longing for? If you did, there's an application or program (referred to as an "app") for just about anything you can dream of that you can install on your device. Because cost is a factor for many government lawyers, young lawyers, or any of us really, it is important to know that there are many "free" apps available that can be downloaded and installed on your device. These apps include, but are not limited to: navigation, fitness, sports, entertainment, books, education, medical, food and drink, games, music, and legal applications.

Because lawyers are interested in legal research, I can recommend two free legal research apps for the iPhone or iPad devices. The first one is WestlawNext, which you can install on your device. You must, however, have a WestlawNext subscription to use this app. Assuming you have a subscription, the app works just like the program on your desktop computer, but it properly sizes and formats it for your device. This app al-

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The new age of privacy: A surprising amount of personal information may already be available to prosecutors

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that the defendant's cell phone was hitting a cell tower in the area where the victim was murdered. In *People v. Reno*, 2011 Ill.App. Unpub. LEXIS 2189 (2nd Dist. 2011), prosecutors used a detailed call log containing cell tower information, later admitted as exhibits under the business records hearsay exception, to identify the defendant's location to within a five-mile radius. In both cases, the defendants were convicted, and both convictions were upheld on appeal, demonstrating the potential utility of this new source of data for prosecutors and law enforcement officials.

While the use of cell phone surveillance in cases such as *Leak* and *Reno* may be significant and helpful, it is hardly novel. In response to a congressional inquiry, cell phone carriers reported that in 2011, they responded to 1.3 million law enforcement demands seeking text messages, caller locations, and other information. These requests came not only from federal and state prosecutors investigating large-scale financial crimes, but also from "run-of-the-mill street crimes" handled by local police departments.[1] With this exponential increase in reliance upon cellular data, cell phone surveillance is rapidly becoming one of the more useful—and used—tools in the prosecutor's arsenal.

Whether such practices are constitutionally acceptable, however, remains a matter of contention in the legal arena. The modern understanding of the privacy interests protected under the Constitution is largely a product of cases from decades ago, involving technology that is just as old. In *Katz v. U.S.*, 389 U.S. 347 (1967), the Supreme Court decided that after shutting the door to a private telephone booth, an individual was entitled expect that "the words he utters into the mouthpiece will not be broadcast to the world," and that law enforcement officials were therefore required to obtain a warrant before using wiretap devices. In *Smith v. Maryland*, 442 U.S. 735 (1979), on the other hand, the Court held that the warrantless use of a device which recorded the numbers dialed from a particular phone in no way offended any constitutional interests, reasoning that individuals have no expectation of privacy in the numbers that they knowingly convey to the phone company. Years later, in *U.S. v. Knotts*, 460 U.S. 276 (1983), the Court approved of the warrantless use of a "beeper" device which allowed a following car to track the beeper from a short distance, reasoning that a person travelling in public has no legitimate expectation of privacy in his movements. The Court nevertheless declined to extend that reasoning further in a case it heard the next year, *U.S. v. Karo*, 468 U.S. 705 (1984). There, the Court held that the use of a beeper device on an item stored within a private residence not opened to visual surveillance violated the Fourth Amendment because it violated the expectation of privacy an individual enjoys in the confines of his own home.

Thus it was on the basis of pen registers, phone booths, and beepers that the Court decided these landmark cases. But technology has made rapid and significant developments since then, rendering the formerly state-of-the-art devices upon which the Court based its decisions obsolete. Given the amount of information that more modern devices generate and transmit—and the potential utility of that information in prosecution—it will likely be necessary to revisit the understanding of what constitutes a reasonable expectation of privacy.

But privacy law governing the prosecutor's use of this new source of data has struggled to keep pace with developing technology. The Supreme Court's most direct recent inquiry on the matter came in *U.S. v. Jones*, 132 S. Ct. 945 (2012), which presented the issue of whether law enforcement officials, without a warrant, could attach a GPS device to a vehicle, trace the vehicle's movements over the course of several weeks, and use the information that the device generated against the individual at his trial. The Court ruled in Jones' favor, finding no justification for the act of attaching the GPS device to the vehicle without a warrant to do so, but in doing so, left open the question of whether law enforcement officials could use GPS data to track individuals without a warrant. As such, *Jones* left the area of law largely unsettled.

What *Jones* left untouched, however, is not likely to remain so for long, as related issues have already begun to percolate through the appellate court system. In *Jayne v. Blunk*, 2012 U.S. App. LEXIS 20724 (9th Cir. 2012), the Ninth Circuit suggested that no warrant would be necessary for law enforcement officials to request cell phone location records from a cellular provider, because the government played no part in the generation or transmission of the GPS cell phone location data which the provider already had.[2] The Sixth Circuit's decision in *United States v. Skinner*, 690 F.3d 772, 778 (6th Cir. 2012), agreed, approving police use of a GPS device on "pay as you go" phone to track its user and finding "no inherent constitutional difference between trailing a defendant and tracking him via such technology." The Second Circuit determined in *U.S. v. Pascual*, 2012 U.S. App. LEXIS 23272 (2nd Cir. 2012), that it was not plain error to admit cell-site records without a warrant or a showing of probable cause, and the Seventh Circuit in *U.S. v. Garcia*, 474 F.3d 994, 996–98 (7th Cir. 2007), held that a warrant was not required to conduct continuous electronic tracking of the defendant's vehicle using a GPS device.

But even though the Seventh Circuit enjoys the support of many other courts in its position, the support for warrantless GPS tracking—at least, without meaningful durational limits—is not unanimous. In *U.S. v. Maynard*, 615 F.3d 544 (D.C. Cir. 2010), the case which would later appear before the Supreme Court as *U.S. v. Jones*, the DC Circuit found that prolonged GPS monitoring, and not only the mere installation of a GPS device, violated the Fourth Amendment. While other courts had approved of surveillance that lasted for only a matter of days, the *Maynard* court found the practically limitless duration of GPS tracking to be constitutionally unacceptable. In ruling for Jones on the issue of the installation of the device, the Supreme Court left the question of the constitutionality of the monitoring itself undisturbed. Several district courts, meanwhile, have also suggested that cell phone location data is protected under the Fourth Amendment.[3] When, whether, and how the Court will resolve the tension between these cases remains to be seen.

Another recent and still-unsettled issue concerns the data found on the cellular device itself, such as text messages and e-mails. In *U.S. v. Butler,* 477 Fed. Appx. 217 (5th Cir. 2012), the Fifth Circuit affirmed that the warrantless search of a cell phone on the person of the defendant upon his arrest offended no constitutional interest, and thus the data obtained through that search, including text messages and call records, was admissible.[4] Similarly, the Seventh Circuit approved of the warrantless search of a cell phone in *U.S. v. Flores-Lopez*, 670 F.3d 803 (7th Cir. 2012).

Though the majority opinion authored by Judge Posner noted the great potential for an invasion of privacy in a warrantless search of a cell phone, the court nevertheless determined that there was no constitutional interest implicated, because the search was limited to finding the phone's number, even though it could "certainly imagine justifications for a more extensive search." *Id.* at 810. The Ohio State Supreme Court and judges in the Northern District of California and the District of Oregon have nevertheless disagreed with the Fifth and Seventh Circuits, citing concerns regarding the large amounts of private data cell phones may contain and ruling instead that upon seizing a phone, police must obtain a warrant to search its contents.[5] Here, too, considerable disparity awaits its ultimate judicial resolution.

Rather than wait for courts to resolve the questions, some states have begun attempts to address these issues by legislative enactment, but without much result to speak of as of yet. Delaware, Maryland, and Oklahoma, for example, have all proposed legislation that would require police to obtain a warrant before demanding location records from cell phone carriers.[6] Similar bills passed through the state legislatures of both California and Rhode Island, but in both states, the bills were struck down by gubernatorial veto before becoming law.[7] Senator Patrick Leahy of Vermont also has proposed changes to the 1986 Electronic Communications Privacy Act which, among other things, would require law enforcement officials to obtain warrants before they can access mobile data such as e-mails and cell phone data.[8] These proposed changes will merit further attention as they are discussed in committee and as they potentially make their way through the legislative process.

As these and other related issues await their resolution, whether in the courts or in the legislatures, law enforcement officials and prosecutors would do well to note the instability in this area of law, particularly as cellular surveillance becomes an increasingly indispensible tool. At present, the Seventh Circuit has looked favorably upon both the warrantless search of cell phones that lawfully come into the hands of law enforcement officials and the use of GPS tracking devices, provided compliance with *U.S. v. Jones.* Challenges to these positions, however, have already seen some degree of success in other courts and legislatures, and even the Seventh Circuit itself has hinted at as-of-yet undiscovered limits to its holdings. Rather than test the limits of these principles or wait and watch as support for these positions erodes beneath their feet, prosecutors and law enforcement officials may be better served by staying on more solid ground by obtaining warrants whenever they seek cellular data. Where there is no time to obtain a warrant, prosecutors may be able to use data collected over a short-term period of a few days, but warrants may be necessary as the accumulation of data becomes more extensive.

In any event, it will be necessary to watch as courts and legislatures continue their attempts to keep pace with developing technological advances. After all, the law can only lag so far behind technology for so long. ■

Patrick T. Driscoll is a Deputy State's Attorney and Chief of the Civil Actions Bureau of the Cook County State's Attorney's Office in Cook County, Illinois. Douglas N. Marsh is a Special Assistant State's Attorney in the Cook County State's Attorney's Office.

1. Eric Lichtblau, "More Demands on Cell Carriers in Surveillance," *N.Y. Times*, June 8, 2012; available at: <http://www.nytimes.com/2012/07/09/us/cell-carriers-see-uptick-in-requests-to-aid-surveillance.html?pagewanted=all> (accessed November 27, 2012).

2. See also *U.S. v. Pineda-Moreno*, 591 F.3d 1212 (9th Cir. 2010) (finding no constitutional violation in either the attachment of a mobile tracking device to a vehicle or its use in monitoring the defendant's movements).

3. See, e.g., *In re Application of the United States of America*, 727 F. Supp. 2d 571, 582 (W.D. Tex. 2010); *In re United States Order Authorizing the Release of Historical Cell-Site Info.*, 736 F. Supp. 2d 578, 596 (E.D.N.Y. 2010); *In re United States ex rel. an Order Authorizing Disclosure of Location Info. of a Specified Wireless Tel.*, 849 F. Supp. 2d 526, 585 (D. Md. 2011).

4. See also *U.S. v. Finley*, 477 F.3d 250, 260 (5th Cir. 2007).

5. *State v. Smith*, 920 N.E.2d 949, 954 (Ohio 2009); *U.S. v. Park*, 2007 U.S. Dist. LEXIS 40596 (N.D. Cal. 2007); *United States v. Hill*, 2011 U.S. Dist. LEXIS 4104 (N.D. Cal. 2011); *Schlossberg v. Solesbee*, 844 F. Supp. 2d 1165, 1168 (D. Or. 2012).

6. Somini Sengupta, "Courts Divided over Searches of Cell Phones," *N.Y. Times*, Nov. 25, 2012; available at: <http://www.nytimes.com/2012/11/26/technology/legality-of-warrantless-cellphone-searches-goes-to-courts-and-legislatures.html?_r=0&adxnnl=1&smid=tw-share&adxnnlx=1354039567-32bn+WWdCGdce6GEK44kDw> (accessed November 27, 2012).

7. *Id.*

8. "Senate to Reconsider Warrantless Cell Phone Searches," *Government Technology,* Nov. 26, 2012, available at: <http://www.govtech.com/public-safety/Senate-to-Reconsider-Warrantless-Cell-Phone-Searches.html> (accessed November 27, 2012).

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Did you get a new iPhone or iPad for Christmas?

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lows you to do your work at any comfortable location, *i.e.* Starbucks, McDonalds, etc. If you are a Lexis subscriber, Lexis has an app called "Lexis Advance," which operates similarly.

However, if you do not have a paid subscription to either WestlawNext or Lexis, fear not. There is a free app for legal research that the ISBA has, in fact, endorsed. That research program is "Fastcase." From your new device, go to the "App Store" icon and hit the search button. Then type in "fastcase." Once you see the "Fastcase" icon, hit the install button. This takes a few minutes to install on your device. Once it's on your device, you're ready to use it. The program allows you to have at your disposal case law from all 50 states and the federal courts. As with other legal research computer programs, one can search by case citation, keyword (Boolean or natural language), or by statute citation. Fastcase for the iPhone or iPad allows the user to sort the most relevant results to the top of the list and customize the search results. If you download and use this app you'll be surprised at how easy it is to use and it really produces fast results. Hence, the name. Try it, you'll like it!!

Lastly, there are two other apps that I recommend that are non-law related. How many times have you left your office or home at night and you could use a flashlight? How many times have you been seated in a dimly lit restaurant and can't read the menu without a flashlight? How many times have you been at a concert or play and can't read the program without a light? So you could use a flashlight, right? Thus, this first app I recommend is for a flashlight app. From the App Store, go to the search button and type in "flashlight." There are a number of free apps that all are good. The one that I have used is "Flashlight." It is easy to use and the light is incredibly bright.

Finally, the second non-law related app that should be considered, and that I recommend, is described in this scenario: How many times in the restaurant after the bill comes, do you have trouble calculating the "tip" for the server. Further, in a party of five, how do you split the bill? Does it include a split of the tip? Well, you guessed it, there's an app for that, too. From the App Store icon, access the search button and key in "tip calculator." You should find a lot of apps, including the free ones. The one I use (it's a fee one) is called "Checkplease." The app calculates the tip according to the percentage you want used and provides for the tip to be rounded or not, and also allows the total bill to be rounded. Further, this app allows you to divide the total bill, including the tip between the number of diners in your party. I love this app as I always want to round the total bill to even dollars and this app allows me to calculate the tip and the total in seconds.

The apps discussed in this article are just a few examples of the hundreds of thousands of apps that are available for your device. Because many of those apps are for purchase, I have focused on the "free apps" for this article. If you have recently received an iPhone or iPad, or have an older generation of these devices, try some of these free apps. It will make your life easier and more enjoyable!! ■

Save the Date!

Ethics Extravaganza Live in Chicago 2013

Presented by the ISBA's Standing Committee on Government Lawyers

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You can close the door, but...

By Thomas L. Ciecko

When a public body meets, that meeting must be open to the public. We know, however, a public body may close its meeting to the public to discuss certain things. One of the subjects that may be discussed by a public body behind closed doors involves litigation. The Open Meetings Act provides, in part, that a public body may hold closed meetings to consider:

> Litigation, when an action against, affecting or on behalf of the particular public body has been filed and is pending before a court or administrative tribunal, or when the public body finds that an action is probable or imminent, in which case the basis for the finding shall be recorded and entered into the minutes of the closed meeting.
>
> 5 ILCS 120/2(c)(11).

There is generally no issue when a public body wishes to discuss litigation where an action has been filed with a court or tribunal against the public body, on behalf of the public body, or concerning the public body. In those instances, an action is pending. A pending matter is one that is begun, within traditional concepts of litigation involving "notice, pleading, trial and appeal." *People ex rel. Hopf v. Barger*, 30 Ill.App.3d 525, 537 (1975) (litigation begun but not completed). If litigation has been filed and is pending, the public body need only announce that in the proposed closed meeting it will discuss litigation that is filed and pending. *Henry v. Anderson*, 356 Ill.App.3d 952, 956 (2005).

It bears noting that a public body may consult with its attorney at any time, and this consultation is not a meeting for the purpose of the Open Meetings Act. *See People ex. rel. Hopf*, 30 Ill.App.3d 538; Ill. Att'y Gen. Op. No. 83-026, issued December 23, 1983, at 7. Consultation may take place on prospective or foreseeable litigation, but may not be used to frustrate the right of the people to be informed as to the conduct of the people's business. *People ex. rel Hopf*, 30 Ill.App.3d 538.

With the litigation exception, questions regarding the propriety of entering closed session under this provision usually arise when the public body seeks to close its meeting to the public to discuss "probable or imminent" legal action against, affecting, or on behalf of the public body. If litigation against, affecting, or on behalf of the public body has not yet been filed with a court or the tribunal, the public body must both find that: (1) the litigation is probable or imminent; and (2) record and enter into the minutes of the closed session the basis for that finding. *Henry*, 356 Ill.App.3d 956 - 57; 5 ILCS 120/2(c)(11).

For litigation to be "probable or imminent," the public body must have reasonable grounds to believe that litigation is, more likely than not, to be commenced, or that such commencement is close at hand. Ill. Att'y Gen. Op. No. 83-026, at 10. For the public body to make the determination that litigation is probable or imminent, the surrounding circumstances must be examined in light of logic, experience, and reason. *Id.* A basis for finding litigation probable or imminent must be explicitly found and expressed. *Henry*, 356 Ill.App.3d 957.

In one case, a school board entertained a motion to go into Executive Session to discuss a "contested litigation matter." Initially, the school board president characterized the litigation as "potential litigation." The Illinois Appellate Court found that the board never explicitly found the litigation was probable or imminent or expressed any basis for such a finding. The court noted that in citing a "contested litigation matter" it was unclear whether "contested" modified "litigation" or "matter." The court found that a violation of the Open Meetings Act had occurred because of the board's failure to state on the record that litigation was probable or imminent and the basis for such a finding. *Henry*, 356 Ill.App.3d 954, 957.

In another instance, an attorney spoke in opposition to action by a city council on behalf of a client and even told the city council that litigation was not contemplated at the time. Nevertheless, the city council closed the meeting to "discuss pending, probable, or imminent litigation." The Illinois Attorney General opined that there were insufficient grounds for the city council to believe litigation was probable or imminent. Ill. Att'y Gen. Op. No. 83-026, at 2-3, 11.

More recently, the finance committee of a county board met in closed session after receiving a letter in opposition to a proposed ordinance which stated, in part, "…[i]f we are unable to resolve this matter…[we] will proceed to file an appropriate legal action…" Based on that letter, the finance committee found litigation to be probable or imminent. The Illinois Attorney General, in a Public Access opinion, found no reasonable basis to believe a lawsuit was imminent or more likely than not to be filed. The opinion found it of note that the letter was sent by a non-attorney, three months prior to the meeting. Ill. Att'y Gen. PAC Op. No. 12-013, issued November 5, 2012, at 4-5.

Once the public body finds an action is probable or imminent and records and enters into its minutes the basis for that finding, the only matters it may discuss in closed session are the strategies, posture, theories, and consequences of the litigation itself. The public body cannot use the closed session to conduct deliberations on the merits of the matter under consideration, no matter how sensitive or controversial the subject matter, nor use the closed session to discuss taking an action or to make a decision on the underlying issue that is likely to be the subject of the litigation. *Id* at 4.

Public bodies can close the door to discuss litigation, but the procedure in 5 ILCS 120/2 must be followed, as the exceptions to having a meeting open to the public are strictly construed against closed meetings. 5 ILCS 120/1(2). ■

Thomas L. Ciecko is currently General Counsel for the Suburban Bus Division of the Regional Transportation Authority. He is a former Assistant Illinois Attorney General, former Chief of the Organized Crime Division of the Will County's State's Attorney's Office, and former Special Assistant United States Attorney. The opinions expressed in this article are his alone and do not necessarily reflect the opinions of the Suburban Bus Division of the Regional Transportation Authority.

Upcoming CLE programs

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May

Thursday, 5/2/13 - Chicago, ISBA Regional Office—Medical Malpractice. Presented by ISBA Tort Law Section. 8:30 am - 5:00 pm.

Friday, 5/3/13 - Moline, Stoney Creek Inn—Civil Practice and Procedure Update - 2013. Presented by the ISBA Civil Practice and Procedure Section. All Day

Saturday, 5/4/13 – Oak Brook, The Hyatt Lodge at McDonald's Campus—DUI, Traffic, and Secretary of State Related Issues. Presented by the ISBA Traffic Laws/Courts Section Council. All Day.

Tuesday, 5/7/13 - Chicago, ISBA Regional Office—Legal Considerations for Entrepreneurs, Founders and Startups. Presented by the ISBA Intellectual Property Section. 8:30 AM – 4:30 PM.

Tuesday, 5/7/13 - Live Webcast—Legal Considerations for Entrepreneurs, Founders and Startups. Presented by the ISBA Intellectual Property Section. AM Session 8:30 AM – 12:00 PM. PM Session 1:00 - 4:30 PM.

Tuesday, 5/7/13 – Webinar—Intro to Legal Research on Fastcase. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 1:30 – 2:30 p.m. CST.

Tuesday, 5/7/13- Teleseminar—Choice of Entity for Service-based and Professional Practice Business. Presented by the Illinois State Bar Association. 12-1.

Wednesday, 5/8/13 - Chicago, ISBA Regional Office—Settlement in the Federal Courts. Presented by the ISBA Federal Civil Practice Section. 12:00 Noon – 4:30 PM.

Wednesday, 5/8/13- Teleseminar—Ethics and the Use of Metadata in Litigation and Law Practice. Presented by the Illinois State Bar Association. 12-1.

Thursday, 5/9/13 - Webinar—Advanced Tips for Enhanced Legal Research on Fastcase. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 1:30 – 2:30 p.m. CST.

Friday, 5/10/13 - Chicago, Bilandic Building—Ethics Extravaganza - Chicago Live 2013. Presented by the ISBA Standing Committee on Government Lawyers. 12:45-5pm.

Friday, 5/10/13 - Lincolnshire, Lincolnshire Marriott—General Practice Update 2013: Suburban Regional Event. Presented by the ISBA General Practice, Solo & Small Firm Section. 8:45 a.m. – 5:00 p.m. CLE Program. 5:30 p.m. – 7:00 p.m. Complimentary Reception Following (RSVP required).

Monday 5/13/13 – Chicago, ISBA Regional Office—Achieving Diversity in Your Law Firm: Business Advantage and Best Practice. Presented by the ISBA Racial and Ethnic Minorities Section; Co-sponsored by the ISBA Sexual Orientation and Gender Identity Section; the ISBA Business and Securities Law Section; the ISBA Diversity Leadership Council; ISBA Standing Committee on Women and the Law Chicago Committee on Minorities in Large Law Firms and the Chinese American Bar Association. 12:30 pm. – 4:30 pm. 4:30 – 6:00 Reception.

Tuesday, 5/14/13- Teleseminar—Estate Planning for Education and Gifts to Minors. Presented by the Illinois State Bar Association. 12-1.

Wednesday, 5/15/13 - Springfield, INB Conference Center—More Issues for the Local Government Attorney. Presented by the ISBA Local Government Law Section. 8:30-1:00.

Wednesday, 5/15/13 – Chicago, ISBA Regional Office—Staying Out of Trouble: Avoiding Sexual Misconduct and Mismanagement of Client Money. Presented by the ISBA Standing Committee on the Attorney Registration and Disciplinary Commission (ARDC). 9:00 – Noon.

Wednesday, 5/15/13 – Live WEBCAST—Staying Out of Trouble: Avoiding Sexual Misconduct and Mismanagement of Client Money. Presented by the ISBA Standing Committee on the Attorney Registration and Disciplinary Commission (ARDC). 9:00 – Noon.

Thursday, 5/16/13 – Chicago ISBA, Regional Office—ISBA's Reel MCLE Series – Flight – Ethical Dilemmas. Master Series Presented by the ISBA. 1:00 – 5:15 pm.

Thursday, 5/16/13- Teleseminar—Attorney Ethics in Adding Lawyers to a Firm. Presented by the Illinois State Bar Association. 12-1.

Friday, 5/17/13 - Chicago, ISBA Regional Office—Mental Health Law- Some Basics and All That's New. Presented by the ISBA Standing Committee on Mental Health Law. 9:00 – 4:00.

Friday, 5/17/13 - Live Webcast—Mental Health Law- Some Basics and All That's New. Presented by the ISBA Standing Committee on Mental Health Law. AM Session 9-1; PM Session 1:30- 4:00.

Tuesday, 5/21/13- Teleseminar—Real Estate Development Agreements, Part 1. Presented by the Illinois State Bar Association. 12-1.

Wednesday, 5/22/13- Teleseminar—Real Estate Development Agreements, Part 2. Presented by the Illinois State Bar Association. 12-1.

Wednesday, 5/22/13 - Webinar—Introduction to Boolean (Keyword) Search. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 1:30 – 2:30 p.m. CST.

Thursday, 5/23/13 - Chicago, ISBA Chicago Regional Office—More Issues for the Local Government Attorney. Presented by the ISBA Local Government Law Section. 9:00 – 1:30 (half day).

Friday, 5/24/13- Teleseminar—Independent Contractor Agreements- Live Replay from 1/11/13. Presented by the Illinois State Bar Association. 12-1. ■