

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION

SHORELINE TOWERS CONDOMINIUM	)	
ASSOCIATION, et al.,	)	
	)	
Plaintiffs,	)	No. 07 CH 06273
	)	
v.	)	Hon. Kathleen Pantle
	)	
DEBRA GASSMAN	)	
	)	
Defendant.	)	

**ORDER**

This matter comes before the court on Defendant, Debra Gassman's ("Gassman"), Motion to Dismiss, pursuant to 735 ILCS 5/2-619. Gassman is a former resident of Shoreline Towers Condominiums, located at 6301 North Sheridan Road in Chicago, a twin-tower condominium consisting of commercial and residential units. (Complaint, ¶¶ 1 & 7). In or about 2004, when defendant was still a resident, a dispute arose between her and Shoreline Towers Condominium Association ("Association") regarding an Association rule that prohibited unit owners from placing personal objects of any sort in the common elements, including common hallways and doorways.. (Complaint, ¶¶ 13, 15, 16). Gassman, who is of the Jewish faith, took issue with the rule because it prohibited her ability to display a mezuzah on her doorway. A mezuzah is commanded by Jewish law to be placed on every door in a home or business owned by a Jewish person. 14 *Encyclopedia Judaica 2<sup>nd</sup> Edition*, 156-57. In an attempt to remedy the effects of this rule, Gassman filed several suits alleging religious discrimination.

On March 15, 2006, Gassman filed a religious discrimination claim with the Illinois Department of Human Rights, which was dismissed on January 29, 2007 for lack of substantial

evidence. (Complaint, ¶¶ 22-24). Then, in May 2005, she filed a religious discrimination complaint with the Office of the Attorney General of the State of Illinois. This action was closed on November 28, 2005 pursuant to the Association's voluntary amendment of its rules on September 12, 2005. (Complaint, ¶¶ 20-21). The amendment states "the display of any religious symbol is limited to one per unit; is limited to display on the door or doorframe of the resident's unit..." (Complaint, Exhibit 1). On May 20, 2005, Gassman filed a religious discrimination complaint with the City of Chicago Commission on Human Relations, an action that is still pending. (Complaint ¶¶ 18-19). Finally, on September 16, 2005, she filed a religious discrimination claim against the Association in the United States District Court for the Northern District of Illinois. On August 7, 2006, the Association prevailed on partial summary judgment and on November 2, 2006, the Association prevailed after a jury trial. (Complaint, ¶¶ 26-29).

It is plaintiffs' contention that defendant began a campaign of harassment and intimidation against plaintiffs and used her position as a Public Defender to conspire with members of the Cook County Sheriff's Department ("Sheriff") and the Chicago Police Department ("CPD") to further her purpose. (Complaint, ¶¶ 31-33). Plaintiffs allege this behavior interfered with the day-to-day operations of the Association to such an extent that it is unable to allocate sufficient resources for the proper administration of the property. (Complaint, ¶ 34).

Beginning in July, 2005, plaintiffs claim Gassman began supplying inaccurate and damaging information to the Jewish Star, a publication geared primarily to the Jewish community. Based on the information provided by the defendant, the Jewish Star referred to the Association's rule as a "Mezuzah Ban" and plaintiffs contend this characterization essentially labeled them as anti-Semitic. (Complaint, ¶¶ 36-39).

On October 20, 2005, the Association had arranged for a charter bus to take residents to attend a harbor meeting regarding the development of a local harbor marina located directly to the east of Shoreline Towers. Residents were notified of this meeting by flyers that were handed out and posted in the common areas. Plaintiffs allege defendant began tearing down the signs in the lobby and screaming that the Association shouldn't be having the meeting. She then approached Edward Frischholz ("Frischholz"), the president of the Board of Directors of the Association and a plaintiff in the instant action, and began an argument. This argument was witnessed by at least five people and culminated in accusing him of threatening her with bodily harm. None of those who allegedly witnessed the incident corroborated defendant's version of the argument. Immediately following the argument, Gassman called the CPD and officers arrived to investigate. These officers went into defendant's unit to speak with her and when the Association's property manager knocked on the door to check on the status of the investigation she saw multiple wine glasses on the coffee table where the police had been sitting with defendant. No charges were ever filed. (Complaint, ¶¶ 71-83). On the same day, Defendant spoke with four Association employees and asked if Frischholz had ever discriminated against them, to which they gave a negative response. (Complaint, ¶ 62).

Plaintiffs also contend in December, 2005, defendant used her influence with the Congregation of Beth Shalom of East Rogers Park ("Congregation") to publicly provoke an altercation between the congregation and Frischholz during a meeting in Shoreline's hospitality room. Apparently, following the amendment to the rules, Frischholz chose to display a crucifix on the door outside his unit and a member of the Congregation covered it up with a garbage bag. (Complaint, ¶¶ 84-87).

In March, 2006, Gassman approached the front desk clerk, LaVelle Barnett ("Barnett"), and attempted to gain access to confidential information, such as employee timecards and guest sign-in sheets. In April, 2006, after looking at the sign-in sheets, defendant told Barnett that she thought Frischholz was getting drug deliveries from the employees of Granville Liquors. She said Granville Liquors was allegedly tied to drug trafficking activities. She also told him she had friends on the "police force" and would be monitoring Frischholz and his guests for suspicious behavior. A few days after this exchange Barnett noticed an unmarked police car in front of the property. (Complaint, ¶¶ 42-47).

On April, 16, 2006, defendant told Boyan Ferouw, an employee, that she was being harassed. (Complaint, ¶ 63). She also told him about the pending litigation and that he should stay away from Frischholz because he was a "bad person." The following day, on April 17<sup>th</sup>, she accused Carlos Reyes, another employee, of desecrating her mezuzah. (Complaint, ¶ 65).

In the summer of 2006, defendant began to question Barnett about employees whose names were on the timecards at the front desk. She asked him why Edward Rakauskas, an Association employee, was coming from one of Frischholz's units and proceeded to opine that it was because he was his homosexual lover. She also told Barnett that Frischholz was involved in a lawsuit related to alleged misconduct with one of his patients. She also asked if he was aware of any sexual and/or medical relationship with another board member, Jan Treptow. She further inquired whether Frischholz had after-hours access to the Association's management office and whether this access included the lock box that contained the Association's emergency keys to all units. She questioned on numerous occasions if he and other employees felt their jobs were at risk if they spoke out against Frischholz and mentioned she was trying to figure out why former employees had stopped working for the Association. (Complaint, ¶¶ 48-53).

On November 7, 2006, election day, the building's lobby served as a polling place for the 2<sup>nd</sup> precinct. During this time the Assistant Building Manager observed Gassman pull up to the main entrance of the building in an unmarked police car with an unidentified sheriff, who was later recognized as having visited her on several other occasions. According to Connie Watkins, a front desk employee, she had heard this individual referred to by defendant as her "spy cop". After some time, the defendant and sheriff entered the building and while defendant was starting to vote the sheriff went into the management office and began asking people, including an elderly resident, if they had a problem with "this woman". It was soon determined "this woman" was the defendant and the reason for the sheriff's inquiry was because defendant thought she was being "starred down". These questions were not related to any official investigation. (Complaint, ¶¶ 88-112).

On January 10, 2007, defendant claimed her laptop had been stolen from her unit by someone using the Association's emergency keys. She asked the doorman if he had seen a black kid and he responded that he had seen an African American man who asked about a wireless connection, but who didn't have a computer. He indicated this man told him his attorney had informed him the building had a wireless connection. The Association thinks this was one of Gassman's clients. Later that evening defendant came back with a CPD officer who told the Association not to let the surveillance tapes disappear. Defendant was later contacted by an Association employee to see if there was any more information surrounding the theft of the computer. This employee also told her the tapes had been secured, but there might be copying fee. Gassman told this person the Association could face civil and criminal charges for assessing a fee. (Complaint, ¶¶ 113-131).

Finally, on January 25, 2007, defendant entered the management office and complained that a potential purchaser of her condominium had backed out because he/she was told there was going to be a special assessment and certain window replacements would be occurring. This exchange created enough of a commotion that employees that were outside of the office heard it and came in to investigate. (Complaint, ¶¶ 133-138).

Based on these alleged facts plaintiffs have filed a ten Count Complaint.

- (1) Count I requests an Injunction on behalf of the Association seeking to enjoin Gassman from interfering with the day to day operations of the Association. (Complaint, ¶ 150).
- (2) Count II is Defamation (Association) relating to the incidents involving allegations of using the emergency keys to steal defendant's laptop, when defendant told Belinda Collins the Association was engaged in misconduct that could result in criminal and civil liability and for telling an employee that the Association had interfered with the sale of her unit by giving false information to a potential buyer. (Complaint, ¶¶ 139-164).
- (3) Count III requests an Injunction (Defamation-Association) enjoining defendant from defaming the Association's character and reputation. (Complaint, p. 27).
- (4) Count IV is Defamation (Frischholz) and relates to defamation about Frischholz regarding alleged misconduct with one of his patients, being involved in drug trafficking and for defendant telling the Jewish Star that he was anti-Semitic. (Complaint, p. 29).
- (5) Count V seeks an Injunction (Defamation-Frischholz) enjoining Gassman from defaming Frischholz's character and reputation. (Complaint, p. 32).
- (6) Count VI is Intentional Infliction of Emotional Distress (Frischholz) for incidents in which Defendant told Barnett Frischholz was getting illegal drug deliveries, that one of the Association employees was his homosexual lover, for telling him there was misconduct with one of his patients, asking if he had access to the Association's emergency keys and if employees felt their jobs were at risk for speaking against him. (Complaint, p. 34).
- (7) Count VII asks for an Injunction (Emotional Distress-Frischholz) enjoining defendant from inflicting emotional distress upon Frischholz.
- (8) Count VIII is Civil Conspiracy alleging defendant used her position as a Public Defender to conspire with members of the Sheriff's Department and the CPD. (Complaint, p. 39).
- (9) Count IX is Malicious Prosecution (Association and Frischholz) for filing all of the suits even after the Association prevailed. (Complaint, p. 42).
- (10) Count X is a Civil Rights Claim (Frischholz) claiming defendant used her position as a Public Defender in violation of §1983 of the *Civil Rights Act*.

Defendant filed a Motion to Dismiss ("Motion") plaintiffs' complaint, pursuant to §2-619. Plaintiffs responded to this motion, defendant replied and the Anti-Defamation League ("ADL") filed an *Amicus Curiae* Brief ("Brief"). For a motion to dismiss under 735 ILCS 5/2-619, all well-pleaded facts and reasonable inferences are accepted as true for the purpose of the motion and the motion should be granted only if the plaintiff can prove no set of facts that would support a cause of action. *Feltmeier v. Feltmeier*, 207 Ill.2d 263, 277-78 (2003).

Defendant argues the entire Complaint should be dismissed pursuant to the Illinois Anti-Strategic Lawsuits Against Public Participation Act ("Anti-SLAPP"), which was enacted on August 28, 2007 and entitled the Citizen Participation Act ("Act"). IL ST CH 735 ILCS 110/1-110-99. The public policy behind the Act states that "the constitutional rights of citizens and organizations to be involved and participate freely in the process of government must be encouraged and safeguarded with great diligence...it is in the public interest and it is the purpose of this Act to strike a balance between the rights of person to file lawsuits for injury and the constitutional rights of persons to petition, speak freely, and otherwise participate in government. 735 ILCS 110/5. Gassman contends she brought her original claims against plaintiffs because she believed she had been the victim of religious discrimination by the plaintiffs when they repeatedly removed her mezuzah from the doorpost of her condominium. (Motion, ¶ 6). As a result, in part, of her actions to challenge the Association's rule, the City of Chicago passed an amendment to the City's Fair Housing Ordinance, making it illegal for condominium associations to interfere with the religious observances of building tenants. The State of Illinois also enacted a similar law. (Motion, ¶ 7). Also, the complaint to the Illinois Attorney General caused the Association to amend their rules to permit the display of religious objects outside owners' doors. (Motion, ¶ 8). It is defendant's contention that it was in the wake of these

lawsuits and her success in getting the Association to amend their rules that plaintiffs filed their complaint. (Motion, ¶ 9).

The first thing that must be determined is whether the plaintiff's complaint is in fact a SLAPP lawsuit. There is no distinct formula for determining whether a SLAPP lawsuit lies, but there are some allegations that frequently appear:

*Libel and slander, tortious interference with contract or business advantage, conspiracy...are only the most frequent claims alleged in SLAPP complaints. Additionally, process violations of malicious prosecution; judicial or administrative abuse of process; constitutional and civil rights violations; and other violations of the law such as trespass, nuisance, emotional harms... The SLAPP action may encompass allegations of a myriad number of claims, and "shotgun" pleading is frequent. Most cases are filed in state rather than federal courts and, in fact, the disputes are essentially local in nature.*

(emphasis added) Dacrr-Bannon, 22 Causes of Action 317, §3. See also Tate, 33 Loy. L.A. L. Rev. at 804-05 ("The most frequent type of SLAPP suit is for defamation, but the causes of action are myriad."). Illinois case law on this subject is scarce, but some guidance may be found in the cases decided in California, where courts have recognized the existence of SLAPP suits in a number of contexts. *Briggs v. Eden Council for Hope and Opportunity*, 969 P.2d 564 (Cal. 1999) (public organization assisting tenants to pursue legal claims against landlord falls under anti-SLAPP statute); *Walsh v. Peskin*, No. A097306, 2002 WL 1897986, at \*2-\*3 (Cal. Ct. App. 2002) (condominium association board member's act of encouraging tenants to file an action for wrongful eviction was in furtherance of the constitutional right of petition and, therefore, was protected by the anti-SLAPP statute); *Dowling v. Zimmerman*, 85 Cal. App. 4<sup>th</sup> 1400, 1418-20 (Cal. Ct. App. 2001) actions conducted by lessees and lawyer in defense of condominium owner's forcible detainer actions protected by anti-SLAPP statute; *Foothills Townhome Ass'n v. Christiansen*, 65 Cal. App., 4<sup>th</sup> 688, 694-95 (Cal. Ct. App. 1998) (suit in retaliation for

homeowner challenging assessment involved matters of sufficient public interests to invoke the protections of the anti-SLAPP statute). These cases serve to show the method to determine if a complaint is a SLAPP suit is not a bright line test, but rather a case by case analysis to determine if the suit is ultimately directed at conduct falling within the defendant's rights of petition, speech, association or participation.

Clearly, based on the statutory language, examples of common SLAPP allegations and using a case by case analysis, the complaint filed by plaintiffs, at least in regards to the Counts involving the Association, is a SLAPP suit. Plaintiffs attempt to avoid the characterization of their complaint as being a SLAPP suit by arguing that it was not filed in an attempt to quell or stop Gassman from further demonstration or outcry because all claims have already been raised by defendant and have been dismissed or tried to verdict in plaintiffs' favor (Response, p. 8). The fact that defendant's claims have all been adjudicated does not prevent the instant action from being characterized as a SLAPP suit. "The Act applies to any motion to dispose of a claim in a judicial proceeding on the grounds that the claim is based on, relates to, or is *in response to* any act or acts of the moving party in furtherance of the moving party's rights of petition, speech, association, or to otherwise participate in government." (emphasis added) 735 ILCS 110/15. The statutory language clearly demonstrates that the statute does not require there be pending attempts to further the moving party's rights. Plaintiffs also seek to have their complaint disqualified as a SLAPP suit by arguing that defendant's suits were based on a dispute between a unit owner and an association on a personal issue to Gassman regarding personal concerns, not issues of major public concerns. This argument truly lacks merit when viewed in conjunction with all of the changes that were made, in part, because of defendant's claims. As was

previously mentioned, not only did the Association change its rules, but the City of Chicago and State of Illinois passed laws as well.

The next issue which must be addressed is plaintiffs' argument that the Act is not retroactive and, even if it was, defendant's behavior is not the type contemplated to be covered. (Response, p. 1). Their argument is based on the fact that plaintiffs filed the instant action against Gassman on March 7, 2007 and the Act was enacted over five months later on August 28, 2007.

In determining whether a statute applies retroactively the seminal case is *Commonwealth Edison Co. v. Will County Collector*, 196 Ill.2d 27 (2001), where the Court concluded that the principles discussed in the United States Supreme Court decision in *Landgraf v. USI Film Products*, 511 U.S. 244 (1994), were the appropriate means for resolving retroactivity under Illinois law. Among the principles stated in *Landgraf* are the following: (1) Legislative intent controls (Id. at 280); (2) "A statute does not operate 'retrospectively' merely because it is applied in a case arising from conduct antedating the statute's enactment." (Id. at 269); (3) "When the intervening statute authorizes or affects the propriety of prospective relief, application of the new provision is not retroactive." (Id. at 273); (4) "Because rules of procedure regulate secondary rather than primary conduct, the fact that a new procedural rule was instituted after the conduct giving rise to the suit does not make application of the rule at trial retroactive." (Id. at 275), and; (5) "We sometimes said that new 'remedial' statutes like new 'procedural' ones, should presumptively apply to pending cases." (Id. at 265). Plaintiffs argue there was no legislative intent that this statute be applied retroactively because there is not language in the Act itself and there is no discussion regarding the issue in the legislative history. (Response, p. 5).

The Act applies to any claim that is “based on, relates to, or is in response to any act or acts of the moving party in furtherance of the moving party’s rights of petition, speech, association, or to otherwise participate in government.” 735 ILCS 110/15. The synopsis of the Bill (Response, Exhibit C) states: “Applies to motions in cases concerning SLAPP lawsuits that *have been filed* to discourage citizen participation in government. The statute “shall be construed liberally to effectuate its purposes and intent fully.” (emphasis added) 735 ILCS 110/30(b). Although there is no discussion in Illinois courts regarding retroactivity under this Act, the First District Illinois Appellate Court has held:

Statutes and amendatory acts are presumed to operate prospectively unless the statutory language is so clear as to admit of no other construction. One of the exceptions to this general rule is that statutes or amendments which relate only to remedies or forms of procedure are given retrospective application.

People v. Theo., 133 Ill. App. 2d 684, 687 (Ill. App. Ct. 1971). Also, California courts again offer guidance. “The anti-SLAPP statute is a procedural statute, the purpose of which is to screen out meritless claims. It is well settled that applying changed procedural statutes to the conduct of existing litigation, even though the litigation involves an underlying dispute that arose from conduct occurring before the effective date of the new statute, involves no improper retrospective application.” *Soukup v. Law Offices of Herbert Hafif*, 39 Cal. 4<sup>th</sup> 260, 280 (Cal. 2006). “The new [anti-SLAPP] statute applies to lawsuits brought before its effective date because it constituted a procedural change regulating the conduct of ongoing litigation and thus triggered no retroactivity concerns.” *Ingels v. Westwood One Broad. Servs., Inc.*, 129 Cal. App. 4<sup>th</sup> 1050, 1065 (Cal. Ct. App. 2005).

Using the retroactivity standards announced by the Illinois Courts and examining the reasoning used by the California courts, this court finds the Act is procedural in nature and

applies to the instant SLAPP suit. Clearly, the suits brought by Gassman in the original litigation were an attempt to exercise her constitutional rights and plaintiffs' Complaint, at least with regards to several of the Counts, was in response to Defendant's furtherance of said rights, therefore, the Act mandates dismissal of Counts I, II, III, VIII, IX and X.

There is an additional reason to dismiss Count X. Count X is brought by Frischholz and pleads an alleged civil rights violation. He pleads in a conclusory manner that Gassman "used her position as a Public Defender" to conspire with members of the Cook County Sheriff's Department and the Chicago Police Department to violate Frischholz's rights. Generally, public defenders (and their assistants such as Gassman) do not act under color of state law when performing a lawyer's traditional functions as counsel to a defendant in a criminal proceeding. *Polk County v. Dodson*, 454 U.S. 312, 325 (1981). A person acts under color of state law only when exercising power "possessed by virtue of state law and made possible only because the wrongdoer is clothed with the authority of state law." *Dodson*, 454 U.S. at 317 quoting *United States v. Classic*, 313 U.S. 299, 326 (1941). Count X contains no factual allegations to support the claim that Gassman, by virtue of her employment with the Cook County Public Defender's Office, was clothed with the authority of state law. Thus, she has the status of a private party.

Though, under Section 1983, a private party who conspires with one or more public officials to deprive another of a right secured by the Constitution and laws of the United States is acting "under color of law" within the terms of Section 1983, this construction of Section 1983 does not provide a cause of action for conspiracy *per se*. *Lesser v. Braniff*, 518 F.2d 538, 540 (1975). An actual denial of due process is required before a cause of action under Section 1983 arises. *Id.* Frischholz has pleaded no facts in support of an allegation that his constitutional rights were actually violated.

Counts IV and V alleging Defamation with regards to Frischholz shall stand. Gassman has accused Frischholz of being involved in unlawful narcotics activity, a felony, which are words which impute a crime. She has also accused him of misconduct with a patient, an allegation which clearly prejudices Frischholz in his profession. The alleged statements of Gassman have nothing to do with the other disputes or her lawsuits, but constitute affirmative statements on her part to damage Frischholz. When considering a motion to dismiss brought pursuant to Anti-SLAPP laws, a court must consider the actual objective of the suit and grant the motion if the true goal is to interfere with and burden the defendant's exercise of his free speech and petition rights. *Ingles v. Westwood One Broadcasting Services, Inc.*, 129 Cal.App.4<sup>th</sup> 1050, 1064 (2005). Anti-SLAPP legislation is intended to protect those who speak out on public or political issues from being sued into silence. Pring and Canan, *SLAPPS: Getting Sued for Speaking Out* 1-3 (1996).

However, Anti-SLAPP legislation is not intended to protect those who actually commit torts. Anti-SLAPP legislation does not permit a person to actually defame another and then seek the protection of the statute. The law is intended to protect those who are in danger of being sued solely because of their valid attempts to petition the government. Mary Dixon and Adam Schwartz, *In Support of Senate Bill 1434 ("The Citizen Participation Act")* (June 18, 2007). Accusing Frischholz of being a narcotics dealer and engaging in misconduct with a patient has nothing to do with Gassman's valid attempts to petition the government. The types of allegations pleaded by Frischholz have been at the heart of many defamation lawsuits, (See *e.g.*, *Tuite v. Corbitt*, 224 Ill.2d 490 (2006) (imputing criminal acts); *Barakat v. Matz*, 271 Ill.App.3d 662 (1995) (imputing an inability to perform or a want of integrity in the performance of professional duties)) and so this Court cannot conclude that the true goal of Frischholz's claims is to interfere

with and burden Gassman's exercise of free speech and petition rights. Most, if not all, reasonable people would file a defamation lawsuit against a defendant who made false accusations of drug dealing and misconduct with a patient. At this stage of the litigation, considering the allegations in the Complaint in the light most favorable to the non-movant, the Court finds that these counts are well-pleaded.

"To make out a claim for defamation, the plaintiff must set out sufficient facts to show that a defendant made a false statement concerning him, that there was an unprivileged publication to a third party with fault by the defendant, which caused damage to the plaintiff." Myers v. Levy, 348 Ill. App. 3d 906, 914 (Ill. App. Ct. 2004). "Defamatory statements may be actionable *per se* or actionable *per quod*. A publication is defamatory *per se* if it is so obviously and naturally harmful to the person to whom it refers that a showing of special damages is unnecessary and extrinsic facts are not needed to explain it." *Id.* "Illinois courts have recognized four categories of statements that are considered defamatory *per se*: (1) words that impute the commission of a crime; (2) words that impute infection with a loathsome communicable disease; (3) words that impute an inability to perform or a want of integrity in the discharge of duties of office or employment; or (4) words that prejudice a party, or impute lack of ability, in his or her trade, profession, or business." *Id.*

Counts VI and VII alleging Intentional Infliction of Emotional Distress with regards to Frischholz shall also stand.

To successfully plead a cause of action for intentional infliction of emotional distress, the plaintiff must allege conduct that goes beyond mere insults, indignities, threats, annoyances, petty oppressions or trivialities. It is not enough that the defendant acts with a tortious or even criminal intent, that he intended to inflict emotional distress, or that his conduct can be characterized by malice. Further, the emotional distress must be so severe that no reasonable man could be expected to endure it. The intensity and

the duration of the distress are factors to be considered in determining its severity.

Lundy v. Calumet City, 209 Ill. App. 3d 790, 793 (Ill. App. Ct. 1991). The facts plead are sufficient for these Counts to survive this Motion to Dismiss and Gassman's alleged behavior is not of the type contemplated to be protected by the Act.

Accordingly, defendant's Motion to Dismiss is granted pursuant to the Citizen Participation Act as to Counts I, II, III, VIII, IX, X and denied as to Counts IV, V, VI, VII.

**DATE:**

Kathleen M. ~~Swatie~~  
**ENTERED**  
MAR 25 2008  
JUDGE KATHLEEN M. SWATIE - 1775  
JURUJIC, SHUMWAY  
CLERK OF THE CIRCUIT COURT  
OF COOK COUNTY, IL  
DEPUTY CLERK