

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MADELINE MENDOZA,)	
)	Case No. 23-cv-2441
Plaintiff,)	
)	Hon. Thomas M. Durkin
v.)	
)	
CITY OF CHICAGO, et al,)	JURY TRIAL DEMANDED
)	
Defendants.)	

MARILYN MULERO,)	
)	Case No. 23-cv-4795
Plaintiff,)	
)	Hon. Thomas M. Durkin
v.)	
)	
REYNALDO GUEVARA, et al,)	JURY TRIAL DEMANDED
)	
Defendants.)	

DEFENDANTS GERI LYNN YANOW, AS SPECIAL REPRESENTATIVE FOR ERNEST HALVORSEN, DECEASED, STEPHEN GAWRYS, AND ANTHONY RICCIO’S ANSWER AND AFFIRMATIVE DEFENSES TO PLAINTIFF’S AMENDED COMPLAINT

Defendants Geri Lynn Yanow, as Special Representative for Ernest Halvorsen (deceased), Stephen Gawrys, and Anthony Riccio (“Defendant Officers”), by their attorneys, The Sotos Law Firm, P.C., in Answer to Plaintiff Madeline Mendoza’s Amended Complaint, state:

1. This is a civil action arising under 42 U.S.C. § 1983. The jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§ 1343 and 1367.

ANSWER: Defendant Officers admit the allegations in Paragraph 1.

2. When she was just 16 years old, plaintiff Madeline Mendoza was framed for murder by notorious Chicago police detectives Reynaldo Guevara and Ernest Halvorsen.

ANSWER: Defendant Officers deny the allegations in Paragraph 2.

3. Mendoza served more than seventeen years of wrongful imprisonment, an injury from which she continues to suffer.

ANSWER: Defendant Officers, on information and belief, admit that Plaintiff served more than seventeen years in prison, and deny the remaining allegations in Paragraph 3.

4. The Chicago Police Department's official policies and customs of failing to discipline, supervise, and control its officers, as well as its code of silence, caused the misconduct of Guevara and Halvorsen.

ANSWER: Defendant Officers deny the allegations in this paragraph to the extent they are directed against them. Defendant Officers lack knowledge or information sufficient to admit or deny the remaining allegations in Paragraph 4.

5. Based on the powerful evidence that has come to light about Guevara and Halvorsen's repeated wrongdoing and evidence of plaintiff's innocence, the Circuit Court of Cook County vacated plaintiff's conviction.

ANSWER: Defendant Officers admit that the Circuit Court of Cook County vacated Plaintiff's conviction. Defendant Officers deny the allegations in this paragraph to the extent they are directed against them. Defendant Officers lack knowledge or information sufficient to admit or deny the remaining allegations in Paragraph 5.

6. Plaintiff brings this lawsuit to secure a remedy for the grievous harms she suffered from her wrongful imprisonment.

ANSWER: Defendant Officers deny that Plaintiff was wrongfully imprisoned and that Plaintiff suffered grievous harms as a result of her imprisonment. Defendant Officers lack knowledge or information sufficient to admit or deny the remaining allegations in Paragraph 6.

I. Parties

7. Plaintiff Madeline Mendoza is a resident of the Northern District of Illinois.

ANSWER: Defendant Officers lack knowledge or information sufficient to admit or deny the allegations in Paragraph 7.

8. Defendant City of Chicago is an Illinois municipal corporation.

ANSWER: Defendant Officers admit the allegations in Paragraph 8.

9. Defendants Reynaldo Guevara, Stephen Gawrys, and Anthony Riccio were, at all relevant times, acting under color of their offices as Chicago police officers. Plaintiff sues these defendants in their individual capacities only.

ANSWER: Defendant Officers admit the allegations directed at them in Paragraph 9, and lack knowledge or information sufficient to admit or deny the remaining allegations in this paragraph.

10. Defendant Geri Lynn Yanow is sued in her capacity as Special Representative of [sic] Ernest Halvorsen, as successor in interest and to defend this action on behalf of Ernest Halvorsen.

ANSWER: Defendant Officers admit that Plaintiff named Geri Lynn Yanow (“Yanow”) as a Defendant as special representative for deceased Defendant Ernest Halvorsen. Answering further, Defendant Officers admit that this Court granted Plaintiff’s motion to appoint Yanow as special representative for Ernest Halvorsen, deceased, for the purpose of defending this lawsuit. Defendant Officers, upon information and belief, deny that Yanow is a “successor in interest” to Ernest Halvorsen, and lack knowledge or information sufficient to admit or deny the remaining allegations in Paragraph 10.

11. Ernest Halvorsen was, at all relevant times, acting under color of his office as a Chicago police officer.

ANSWER: Defendant Officers admit the allegations in Paragraph 11.

12. Plaintiff refers to Ernest Halvorsen, Reynaldo Guevara, Stephen Gawrys, and Anthony Riccio as the “individual officer defendants.”

ANSWER: Defendant Officers admit the allegations in Paragraph 12.

II. False Arrest and Unreasonable Prosecution of Plaintiff

13. On May 12, 1992, Jacqueline Montanez shot and killed Jimmy Cruz and Hector Reyes in Humboldt Park on the West Side of Chicago.

ANSWER: Defendant Officers, on information and belief, admit that Jacqueline Montanez shot and killed Hector Reyes on May 12, 1992 in Humboldt Park on the West Side of Chicago, and, on information and belief, deny the remaining allegations in Paragraph 13.

14. At the time of the killings, plaintiff was with Montanez, Cruz, Reyes, and another woman, Marilyn Mulero.

ANSWER: Defendant Officers, on information and belief, admit the allegations in Paragraph 14.

15. Plaintiff did not have any prior knowledge of any plan to kill Cruz or Reyes and she did not in any way aid, abet, facilitate, or participate in the homicides.

ANSWER: Defendant Officers, on information and belief, deny the allegations in Paragraph 15.

16. Defendants Guevara and Halvorsen were assigned to investigate the murders.

ANSWER: Defendant Officers admit the allegations in Paragraph 16.

17. Defendants Guevara and Halvorsen conspired, confederated, and agreed to fabricate a false story that plaintiff had participated in the murders.

ANSWER: Defendant Halvorsen denies the allegations in Paragraph 17. Defendants Gawrys and Riccio, on information and belief, deny the allegations in Paragraph 17.

18. Defendants Guevara and Halvorsen concocted the false story that Montanez shot Reyes, she then gave the gun to Mulero, and then Mulero shot Cruz after plaintiff signaled Mulero to shoot.

ANSWER: Defendant Halvorsen denies the allegations in Paragraph 18. Defendants Gawrys and Riccio, on information and belief, deny the allegations in Paragraph 18.

19. The acts of Guevara and Halvorsen in furtherance of their scheme to frame plaintiff include the following:

- a. They caused Montanez to make a statement falsely implicating plaintiff in the murders;

- b. They caused Mulero to make a statement falsely implicating plaintiff in the murders;
- c. They caused Yvette Rodrigues to provide a false statement that she had heard plaintiff, Montanez, and Mulero each bragging about the shootings;
- d. They caused Jackie Serrano to provide a false statement that she had witnessed plaintiff participate in the shooting of Cruz from her apartment; and
- e. They caused Joan Roberts, a jailhouse informant, to provide a false statement that plaintiff had admitted to participating in the murders.

ANSWER: Defendant Halvorsen denies the allegations in Paragraph 19 and all its subparts. Defendants Gawrys and Riccio, on information and belief, deny the allegations in Paragraph 19 and all its subparts.

20. The acts of Guevara and Halvorsen in furtherance of their scheme to frame plaintiff also include the following:

- a. They prepared police reports containing the false story;
- b. They attested to the false story through the official police reports; and
- c. They communicated the false story to prosecutors.

ANSWER: Defendant Halvorsen denies the allegations in Paragraph 20 and all its subparts. Defendants Gawrys and Riccio, on information and belief, deny the allegations in Paragraph 20 and all its subparts.

21. Defendants Gawrys and Riccio either participated in the above described acts or knew of them and failed to intervene to prevent the violation of plaintiff's rights.

ANSWER: Defendants Gawrys and Riccio deny the allegations in Paragraph 21. Defendant Halvorsen, on information and belief, denies the allegations in Paragraph 21.

22. The individual officer defendants committed the above-described wrongful acts knowing that the acts would cause plaintiff to be held in custody and wrongly prosecuted.

ANSWER: Defendant Officers deny the allegations in Paragraph 22 to the extent they are directed against them. Defendant Officers lack knowledge or information sufficient to admit or deny the remaining allegations in Paragraph 22.

23. Plaintiff was charged with murder because of the wrongful acts of the individual defendants.

ANSWER: Defendant Officers deny the allegations in Paragraph 23 to the extent they are directed against them. Defendant Officers lack knowledge or information sufficient to admit or deny the remaining allegations in Paragraph 23.

24. Plaintiff knew that it would be impossible to prove that the individual officers had concocted the evidence against her.

ANSWER: Defendant Officers deny that they “concocted” evidence against Plaintiff, and lack knowledge or information sufficient to admit or deny the remaining allegations in Paragraph 24.

25. Accordingly, even though plaintiff was innocent, she pleaded guilty to the murder of Cruz and to conspiracy to commit the murder of Reyes on September 22, 1993, and she was sentenced to 35 years for murder concurrent to 7 years for conspiracy.

ANSWER: Defendant Officers deny that Plaintiff was innocent and that she pleaded guilty despite her purported innocence. Defendant Officers, on information and belief, admit that on September 22, 1993, Plaintiff pleaded guilty to the murder of Cruz and to conspiracy to commit the murder of Reyes, and was sentenced to 35 years for murder concurrent to 7 years for conspiracy.

26. Plaintiff served her sentence and was released from prison in 2009.

ANSWER: Defendant Officers, on information and belief, admit the allegations in Paragraph 26.

27. Plaintiff was deprived of liberty because of the above-described wrongful acts of the individual officer defendants.

ANSWER: Defendant Officers deny the allegations in Paragraph 27.

III. Plaintiff's Exoneration

28. Plaintiff challenged the above-described wrongful conviction after learning that lawyers for other wrongfully convicted individuals had discovered repeated misconduct by Guevara

and Halvorsen.

ANSWER: Defendant Officers deny that Plaintiff was wrongfully convicted and that Defendant Halvorsen engaged in “repeated misconduct” that led to the purported wrongful convictions of other individuals. Defendant Officers lack knowledge or information sufficient to admit or deny the remaining allegations in Paragraph 28.

29. On January 3, 2023, the Circuit Court of Cook County vacated plaintiff’s convictions and granted the State’s request to *nolle prosequi* the case.

ANSWER: Defendant Officers admit the allegations in Paragraph 29.

**IV. Official Policies and Customs of the Chicago
Police Department Were the Moving Force for Defendants’ Misconduct**

30. At all relevant times, the Chicago Police Department maintained official policies and customs that facilitated, encouraged, and condoned the misconduct of the individual officer defendants.

ANSWER: Defendant Officers deny the allegations in Paragraph 30 to the extent they are directed against them, and further deny that they acted pursuant to the policies and/or customs as alleged. Defendant Officers lack knowledge or information sufficient to admit or deny the remaining allegations in Paragraph 30.

A. Failure to Discipline

31. At all relevant times, the Chicago Police Department maintained a policy or custom of failing to discipline, supervise, and control its officers. By maintaining this policy or custom, the City caused its officers to believe that they could engage in misconduct with impunity because their actions would never be thoroughly scrutinized.

ANSWER: Defendant Officers deny the allegations in Paragraph 31 to the extent they are directed against them, and further deny that they acted pursuant to the policies and/or customs as alleged. Defendant Officers lack knowledge or information sufficient to admit or deny the remaining allegations in Paragraph 31.

32. Before plaintiff's arrest, policymakers for the City of Chicago knew that the Chicago Police Department's policies or customs for disciplining, supervising, and controlling its officers were inadequate and caused police misconduct.

ANSWER: Defendant Officers lack knowledge or information sufficient to admit or deny the allegations in Paragraph 32.

33. Despite their knowledge of the City's failed policies and customs for disciplining, supervising, and controlling its officers, the policymakers failed to take action to remedy these problems.

ANSWER: Defendant Officers lack knowledge or information sufficient to admit or deny the allegations in Paragraph 33.

34. As a direct and proximate result of the Chicago Police Department's inadequate policies or customs for disciplining, supervising, and controlling its officers and the policymakers' failure to address these problems, the individual officer defendants engaged in misconduct, including but not limited to the wrongful arrest, detention, and prosecution of plaintiff, as described above.

ANSWER: Defendant Officers deny the allegations in Paragraph 34 to the extent they are directed against them, and further deny that they acted pursuant to the policies and/or customs as alleged. Defendant Officers lack knowledge or information sufficient to admit or deny the remaining allegations in Paragraph 34.

B. Code of Silence

35. At all relevant times, the Chicago Police Department maintained a "code of silence" that required police officers to remain silent about police misconduct. An officer who violated the code of silence would be penalized by the Department.

ANSWER: Defendant Officers lack knowledge or information sufficient to admit or deny the allegations in Paragraph 35.

36. At all relevant times, police officers were trained at the Chicago Police Academy not to break the code of silence. Officers were instructed that "Blue is Blue. You stick together. If

something occurs on the street that you don't think is proper, you go with the flow. And after that situation, if you have an issue with that officer or what happened, you can confront them. If you don't feel comfortable working with them anymore, you can go to the watch commander and request a new partner. But you never break the code of silence.”

ANSWER: Defendant Officers lack knowledge or information sufficient to admit or deny the allegations in Paragraph 36.

37. This “code of silence” facilitated, encouraged, and enabled the individual officer defendants to engage in egregious misconduct for many years, knowing that their fellow officers would cover for them and help conceal their widespread wrongdoing.

ANSWER: Defendant Officers deny the allegations in Paragraph 37 to the extent they are directed against them, and further deny that they acted pursuant to the policies and/or customs as alleged. Defendant Officers lack knowledge or information sufficient to admit or deny the remaining allegations in Paragraph 37.

38. In the case of *Obrycka v. City of Chicago et al.*, No. 07-cv-2372 (N.D. Ill.), a federal jury found that, as of February 2007, “the City [of Chicago] had a widespread custom and/or practice of failing to investigate and/or discipline its officers and/or code of silence.”

ANSWER: Defendant Officers lack knowledge or information sufficient to admit or deny the allegations in Paragraph 38.

39. In December 2015, Chicago Mayor Rahm Emanuel acknowledged the continued existence of the code of silence within the Chicago Police Department; Emanuel, speaking in his capacity as Mayor, admitted that the code of silence leads to a culture where extreme acts of abuse are tolerated.

ANSWER: Defendant Officers lack knowledge or information sufficient to admit or deny the allegations in Paragraph 39.

40. In April 2016, the City's Police Accountability Task Force found that the code of silence “is institutionalized and reinforced by CPD rules and policies that are also baked into the labor

agreements between the various police unions and the City.”

ANSWER: Defendant Officers lack knowledge or information sufficient to admit or deny the allegations in Paragraph 40.

41. In an official government report issued in January 2017, the United States Department of Justice found that “a code of silence exists, and officers and community members know it.”

ANSWER: Defendant Officers lack knowledge or information sufficient to admit or deny the allegations in Paragraph 41.

42. On March 29, 2019, then-Chicago Police Superintendent Eddie Johnson publicly acknowledged the code of silence, stating that some Chicago police officers “look the other way” when they observe misconduct by other Chicago police officers.

ANSWER: Defendant Officers, on information and belief, admit that former Chicago Police Superintendent Eddie Johnson was interviewed for a newspaper article in March 2019, and in response to a question, was quoted as stating, “Do I think there might be officers that look the other way? Yeah, I do.” Answering further, Defendant Officers, on information and belief, admit that Mr. Johnson was further quoted as stating that he was “not going to indict the entire department for the acts of certain individuals.” Defendant Officers deny the allegations in Paragraph 42 to the extent they are directed against them, and further deny that they acted pursuant to the policies and/or customs as alleged. Defendant Officers lack knowledge or information sufficient to admit or deny the remaining allegations in Paragraph 42.

43. In October 2020, then-Chicago Police Superintendent David Brown acknowledged in public comments that the “code of silence” continues to exist.

ANSWER: Defendant Officers state that Paragraph 43 does not identify any particular speech or public statement purportedly made by former Chicago Police Superintendent David Brown, such that they can admit or deny the allegations. Defendant Officers deny the allegations in Paragraph 43 to the extent they are directed against them, and further deny that they acted pursuant to the policies and/or customs as alleged. Defendant Officers lack knowledge or information sufficient to admit or deny the remaining allegations in Paragraph 43.

44. The same code of silence in place during the time period at issue in the *Obrycka* case and recognized by the Mayor, Superintendent Johnson, Superintendent Brown, the Task Force, and the Department of Justice was also in place when plaintiff suffered the wrongful arrest, detention, and prosecution described above.

ANSWER: Defendant Officers deny the allegations in Paragraph 44 to the extent they are directed against them, and further deny that they acted pursuant to the policies and/or customs as alleged. Defendant Officers lack knowledge or information sufficient to admit or deny the remaining allegations in Paragraph 44.

45. As a direct and proximate result of the City's code of silence, the individual officer defendants engaged in misconduct, including but not limited to the wrongful arrest, detention, and prosecution of plaintiff, as described above.

ANSWER: Defendant Officers deny the allegations in Paragraph 45.

C. The City's Policies and Customs Have Caused Numerous Other Wrongful Convictions

46. Chicago Police Officers, including the individual officer defendants, acting pursuant to defendant City of Chicago's "code of silence" and defective discipline policy have concocted false stories and fabricated evidence in numerous other cases.

ANSWER: Defendant Officers deny the allegations in Paragraph 46 to the extent they are directed against them, and further deny that they acted pursuant to the policies and/or customs as alleged. Defendant Officers lack knowledge or information sufficient to admit or deny the allegations in Paragraph 46.

47. In each case, the officers concocted false stories and fabricated evidence because they knew that there would be no consequences for their misconduct because of defendant City of Chicago's "code of silence" and defective discipline policy.

ANSWER: Defendant Officers deny the allegations in Paragraph 47 to the extent they are directed against them, and further deny that they acted pursuant to the policies and/or customs as alleged. Defendant Officers lack knowledge or information sufficient to admit or deny the allegations in Paragraph 47.

48. These numerous cases include, but are not limited to, the following:
- a. In August of 1988, defendant Guevara caused Jacques Rivera to be falsely convicted of murder by coercing a witness to falsely identify Rivera;
 - b. In September of 1989, defendant Guevara caused Juan Johnson to be falsely convicted of murder by coercing a witness to falsely identify Johnson;
 - c. In August of 1990, defendant Guevara caused Jose Maysonet to be falsely convicted of murder by coercing him into falsely confessing;
 - d. In January of 1991, defendant Guevara caused Xavier Arcos to be falsely convicted of murder by coercing a witness to falsely identify Arcos;
 - e. In May of 1993, defendants Guevara and Halvorsen caused Armando Serrano and Jose Montanez to be falsely convicted of murder by coercing a witness to falsely testify that Serrano and Montanez admitted to committing the murder;
 - f. In May of 1993, defendants Guevara and Halvorsen caused Robert Bouto to be falsely convicted of murder by coercing two jailhouse informants to falsely testify that Bouto admitted to committing the murder;
 - g. In June of 1993, defendant Guevara caused Gabriel Iglesias to be falsely convicted of murder by coercing two witnesses to falsely identify Iglesias and by coercing a jailhouse informant to falsely testify that Iglesias admitted to committing the murder;
 - h. In September of 1994, defendant Guevara caused Roberto Almodovar and William Negrón to be falsely convicted of murder by coercing a witness to falsely identify Almodovar and Negrón;
 - i. In May of 1995, defendants Guevara and Halvorsen caused Thomas Sierra to be falsely convicted of murder by coercing false testimony from two witnesses; and

- j. In April of 1998, defendant Guevara caused Gabriel Solache and Arturo Reyes to be falsely convicted of murder and kid- napping by coercing them to give false confessions.

ANSWER: Defendant Officers deny the allegations in Paragraph 48, and all its subparts, directed against them. Defendant Officers lack knowledge or information sufficient to admit or deny the remaining allegations in Paragraph 48, and all its subparts, directed against Defendant Guevara.

V. Claims

49. As a result of the foregoing, defendants caused plaintiff to be deprived of rights secured by the Fourth and Fourteenth Amendments.

ANSWER: Defendant Officers deny the allegations in Paragraph 49.

50. As a supplemental state law claim against defendant City of Chicago only: as a result of the foregoing, plaintiff was subjected to a malicious prosecution under Illinois law.

ANSWER: Defendant Officers deny the allegations in Paragraph 50.

51. Plaintiff hereby demands trial by jury.

ANSWER: Defendant Officers admit that Plaintiff demands trial by jury.

AFFIRMATIVE DEFENSES

First Affirmative Defense

Defendant Officers were government officials, namely police officers, who perform discretionary functions. At all times material to the events alleged in Plaintiff's complaint, a reasonable police officer objectively viewing the facts and circumstances that confronted the Defendant Officers, could have believed their actions to be lawful, in light of clearly established law and the information that the Defendant Officers possessed. Defendant Officers are therefore entitled to qualified immunity as to Plaintiff's federal claims.

Second Affirmative Defense

Defendant Officers are absolutely immune from civil liability for their testimony given in judicial proceedings in Plaintiff's underlying criminal case. *Briscoe v. LaHue*, 460 U.S. 325, 330-31, 103 S.Ct. 1108, 1113 (1983); *Jurgensen v. Haslinger*, 295 Ill.App.3d 139, 141-42; 692 N.E.2d 347, 349-50 (3rd Dist. 1998).

Third Affirmative Defense

Plaintiff's claims are barred by the doctrines of res judicata, collateral estoppel, judicial estoppel, and waiver.

Fourth Affirmative Defense

Plaintiff's claims as alleged in his Complaint are barred in whole or in part by the applicable statute of limitations.

Fifth Affirmative Defense

Plaintiff has a duty to mitigate his damages, and any damages awarded to Plaintiff are required to be reduced by any amount by which the damages could have been lessened by Plaintiff's failure to take reasonable action to minimize those damages.

Sixth Affirmative Defense

Any recovery or award of damages against deceased person Ernest Halvorsen is limited by Illinois law. 735 ILCS 5/13-209(b)(2).

JURY DEMAND

Defendant Officers request a trial by jury.

Dated: May 6, 2024

Respectfully submitted,

/s/ Josh Engquist

JOSH M. ENGQUIST, Attorney No. 6242849
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Representative Yanow*

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CERTIFICATE OF SERVICE

I certify under penalty of perjury pursuant to 28 U.S.C.A. § 1746 that the foregoing is true and correct, that May 6, 2024, I electronically filed the foregoing **Defendants Geri Lynn Yanow, as Special Representative for Ernest Halvorsen, Deceased, Stephen Gawrys, and Anthony Riccio's Answer and Affirmative Defenses to Plaintiff's Amended Complaint** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following CM/ECF participants listed in the below service list.

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