No. 126852

IN THE

SUPREME COURT OF ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS, Plaintiff-Appellee, -vs- SERVETUS BROWN, Defendant-Appellant.	)))))))))))	Appeal from the Appellate Court of Illinois, No. 1-18-0826. There on appeal from the Circuit Court of Cook County, Illinois , No. 17 CR 10469. Honorable Neera Lall Walsh, Judge Presiding.

REPLY BRIEF FOR DEFENDANT-APPELLANT

JAMES E. CHADD
State Appellate Defender

DOUGLAS R. HOFF
Deputy Defender

KIERAN M. WIBERG
Assistant Appellate Defender
Office of the State Appellate Defender
First Judicial District
203 N. LaSalle St., 24th Floor
Chicago, IL 60601
(312) 814-5472
1stdistrict.eserve@osad.state.il.us

COUNSEL FOR DEFENDANT-APPELLANT

E-FILED
12/10/2021 3:14 PM
CYNTHIA A. GRANT
SUPREME COURT CLERK

ARGUMENT

Servetus Brown was denied his rights to be present and to the effective assistance of counsel where the circuit court had the parties select jurors during off-the-record sidebar conferences for which Mr. Brown was not present and where his attorney failed to object to this improper procedure.

Servetus Brown has argued before this Court, and in the appellate court below, that he was denied his right to be present and his right to the effective assistance of counsel. This claim arose from the circuit court's decision to have the attorneys select the jurors in Mr. Brown's case off the record and without Mr. Brown present, as well as counsel's acquiescence to that decision.

Mr. Brown further argued that, under the unique circumstances of this case, prejudice from the denial of his right to be present should be presumed. Because this portion of Mr. Brown's trial was held both out of his presence and off the record, he lacks any basis on which he could ever show prejudice, because he does not know, and cannot know, what happened during this part of his trial. Failure to presume prejudice here would result in a denial of Mr. Brown's right to a direct appeal of his conviction and would, for all intents and purposes, place this important portion of the proceedings in his case beyond any conceivable review.

The State responds by arguing that counsel performed adequately and that Mr. Brown cannot show prejudice even if error did occur. Many of the State's arguments rely upon its repeated invocation of a presumption of regularity in the proceedings below. Put simply, the State asks this Court to presume that everything that happened off the record in this case happened

properly and that, despite the errors that are plain on the face of the record, both court and counsel cured any possible prejudice during proceedings off the record. Because this argument reappears in various guises throughout the State's response brief, Mr. Brown will reply to the various iterations of it all together here at the beginning of his reply, before turning to address the remainder of the State's arguments.

A. The State's "presumption" argument.

As noted above, the State repeatedly invokes a single, well-worn principle of appellate law: in the absence of evidence to the contrary, reviewing courts will presume that the proceedings below were conducted appropriately. (State's Brief at 6, 10, 17-18) This basic principle is applied in the form of various presumptions. As relevant to this case, it is well established that, absent evidence to the contrary, the trial court will be presumed to know and to have followed the law. *In re Jonathon C.B.*, 2011 IL 107750, ¶72. Similarly, where the adequacy of counsel's representation is put into question, reviewing courts will presume that counsel acted reasonably absent evidence of record showing deficient performance. *People v. Manning*, 241 Ill. 2d 319, 326-27 (2011) (quoting *People v. Smith*, 195 Ill. 2d 179, 188 (2000)).

The State repeatedly invokes these presumptions throughout its arguments addressing both prongs of the *Strickland* standard in this case. However, the State neglects to address a key component of that presumption: "[t]his court presumes that a trial judge knows and follows the law *unless the record affirmatively indicates otherwise."* (St. Br. at 17) (quoting *C.B.*, 2011

IL 107750, ¶72) (emphasis added). In this case, the record clearly and unequivocally demonstrates that neither the trial court nor counsel followed the law as it relates to this issue.

In *People v. Bean*, 137 Ill. 2d 65, 84 (1990), this Court established that a defendant has a right to be present "throughout the jury selection process," but, in this case, half of that process, the actual selection of the jurors, was held by the court and counsel without Mr. Brown present. This Court's Rules establish that the jury selection proceedings are required to be recorded, but in this case, the court and counsel conducted half of that process without the court reporter present. Ill. S. Ct. R. 608(a)(7). The summary of these off-the-record proceedings that took place in Mr. Brown's absence was also incorrect, omitting any account of the dismissal of one juror. There is no basis to presume that court and counsel followed the law in the face of direct evidence of record that they did not.

Furthermore, the State's presumption arguments sweep far too broadly. Much of the State's argument boils down to the claim that it is possible, despite the total absence of any evidence, that the court and counsel discussed all of these issues with Mr. Brown somewhere off the record and that he (presumably) consented to the process. (St. Br. at 10) Having hypothesized the existence of these off-the-record proceedings, the State then declares that Mr. Brown cannot prevail on his claim now because he cannot prove that such off-the-record proceedings *did not happen*. (St. Br. at 10)

The State attempts to flip the arguments in this case on their head, claiming that Mr. Brown has inverted the traditional presumption and relied

upon assumptions without evidence. (St. Br. at 10) To the contrary, Mr. Brown argued what the record in this case actually shows. That record shows that there was no discussion about holding jury strikes at sidebar prior to the beginning of the selection process and that no jurors were actually dismissed until the entire selection process was complete. (R. 24-55, 84, 98, 131, 150, 151, 157, 160) Therefore, Mr. Brown had no way to know that selection was going to take place at sidebar and had no way to infer as much even during the proceedings. That record shows that no recesses were taken during the selection process to give Mr. Brown a chance to consult with his attorney. (R. 58-160) Therefore, Mr. Brown had no chance to participate in the selection of the jury, because he could not have known beforehand and he was not given an opportunity during the proceedings.

The State, however, would have this Court speculate that, despite the absence of any evidence on the record, all of these things actually occurred during some unknown, off the record proceeding. (St. Br. at 10) It is the State, not Mr. Brown, that would have this Court speculate as to matters that are nowhere shown of record. What the record shows is that Mr. Brown had no opportunity to participate in the selection of his jury and the State has presented nothing that shows otherwise.

There are few, if any, appellate claims that would be immune to challenge on the basis that *something* could have happened off the record that would have resolved the issue. As a ready example, it is hard to imagine an error more plain on the face of the record than the circuit court failing to question the jury properly according to Rule 431(b). However, following the

State's argument here, it could always be hypothesized that the judge did actually fully and properly question the jury off the record, rendering any violation harmless. It would be hard to imagine any claim that could survive against such wanton speculation.

Mr. Brown need not speculate here as to whether, under different circumstances, the record in a different case might provide sufficient indication of off-the-record proceedings to warrant consideration of this issue or to argue in favor of resolving the matter via post-conviction proceedings. (St. Br. at 10-11) In this case, there is literally no evidence suggesting that the cure-all proceedings the State hypothesizes actually happened and the State has not pointed to any. The State's argument would transform the well-established presumption of regularity into an invitation to engage in wild speculation about what kind of off-the-record proceedings could possibly have occurred, and to then use that speculation to defeat nearly any appellate claim.

The State again employs this presumption when it argues that the record in this case is sufficient to show that Mr. Brown was not prejudiced by the errors by both court and counsel. (St. Br. at 17-18) To that end, the State argues that the brief summary of proceedings that the trial court provided after the jury selection was over was sufficient to protect Mr. Brown's right to be present as well as his right to appellate review. (St. Br. at 14-15, 17-18) It acknowledges that the record in fact shows that the trial court's summary was *not* complete, as the court omitted any mention of one juror who the record shows was excluded. (St. Br. at 18) However, it finds that omission

unproblematic because the remainder of the record provides evidence as to why that juror was excluded. (St. Br. at 18)

The State's argument here misses the point. The State argued below, and continues to argue now, that Mr. Brown suffered no prejudice from his exclusion from the selection of his jury and from the failure to hold those proceedings on the record, because the judge gave a full account of everything that happened during those off-the-record proceedings afterwards. (St. Br. at 14-15) Once again, the State asks this Court to presume, in the absence of any support in the record, that everything went fine and that the trial judge acted appropriately. Specifically, the State asks this Court to presume that the judge gave a full and proper accounting of all of the proceedings. (St. Br. at 14-15)

However, as with the other matters the State would have this Court resolve by irrebuttable presumption, the record here undermines the basis for the presumption in question. It makes no sense to ask this Court to presume that the judge gave a full and accurate accounting of the proceedings in the face of evidence of record proving that she did not. The record may allow this Court to determine the reason why one particular juror was removed, despite the absence of a record of the actual strike *or* an explanation by the trial court. However, the very existence of that omission undermines the presumption that the State would have this Court rely on to resolve this case. Any number of other facts could have also been omitted in the trial court's summary, it just so happens that only one of those omissions is clearly shown by the rest of the record. Where the record is clear that the trial court omitted

some important facts, there is little reason to presume it did not omit others.

To summarize, the record in this case shows without question that neither the trial judge nor trial counsel followed the applicable law in this case where the jury strikes were held out of Mr. Brown's presence and off the record. *Bean*, 137 Ill. 2d at 84; Ill. S. Ct. R. 608(a)(7). The State's repeated insistence that this Court should presume otherwise flies in the face of both well-established precedent and basic common sense. The State's attempt to resolve this case via speculation should be rejected.

B. The right to be present for all critical stages includes the right to be present for the actual selection of the jury and counsel performed unreasonably by acquiescing in the circuit court's improper procedure.

As an initial matter, the State suggests in a footnote that this Court has implicitly overruled its well established holding in *People v. Mallet*, 30 Ill. 2d 136, 141-42 (1964), that a defendant's right to be present is a personal one that cannot be waived by counsel. (St. Br. at 8, fn. 4) It claims that this Court overruled that decision in *People v. Campbell*, 208 Ill. 2d 203 (2003). (St. Br. at 8, fn. 4) However, *Campbell* had literally nothing to do with this issue, never mentioned *Mallet*, and has no relevance to this case. *Campbell* held that an attorney may agree to a stipulation without first consulting with their client. 208 Ill. 2d at 217. *Campbell* had nothing to do with, and did not discuss, jury selection, a defendant's right to be present at critical portions of his trial, or the right to a full and fair direct appeal. The State's attempt to overturn binding precedent by way of a footnote should be rejected.

The State argues, again via footnote, that neither *Bean* nor *People v. Oliver*, 2012 IL App (1st) 102531, support Mr. Brown's contention that he had

a right to be present for the selection of his jury. (St. Br. at 6-7, fn. 2-3) However, that contention is belied by the plain language of both decisions. *Bean* stated, simply and without restriction, that a defendant has a right to be present "throughout the jury selection process." *Bean*, 137 Ill. 2d at 84. The actual acceptance and striking of jurors is unquestionably a part of the "jury selection process."

Following this Court's clear language in *Bean*, *Oliver* held that the defendant made an arguable claim that his counsel's performance was deficient when that counsel failed to protect the defendant's right to be present for the actual jury strikes. *Oliver*, 2012 IL App (1st) 102531, ¶¶5, 22. Such a holding would be literally impossible if the defendant had no right to be present in the first place. Both *Bean* and *Oliver* clearly support Mr. Brown's argument here.

Moreover, as discussed in Mr. Brown's opening brief, granting the defendant the right to be present for only half of the jury selection proceedings would be a futile gesture. (Opening Brief at 8-9) A defendant who was not present for the questioning of the potential jurors cannot meaningfully assist counsel in determining which jurors should be struck. Just the same, granting the defendant a right to be present for the questioning of the potential jurors becomes meaningless if the defendant will not have an opportunity to participate in the striking and accepting of those jurors. Even the *Spears* line of cases seemed to recognize this fact, as each of those decisions discussed the fact that, in those cases, the record demonstrated that the defendant *did* have an opportunity to assist counsel in

the selection of the jury. See *People v. Spears*, 169 Ill. App. 3d 470, 482-83 (1st Dist. 1988); *People v. Beachem*, 189 Ill. App. 3d 483, 491-92 (1st Dist. 1989); *People v. Gentry*, 351 Ill. App. 3d 872, 882-84 (4th Dist. 2004).

For these same reasons, the State's argument that counsel could not have performed deficiently by following "binding precedent," fails. (St. Br. at 7) *Spears*, *Beachem*, and *Gentry* were not binding precedent at the time that counsel failed to protect Mr. Brown's rights. To the contrary, the holding in those decisions had been disagreed with by both this Court and the First District. *Bean*, 137 Ill. 2d at 84; *Oliver*, 2012 IL App (1st) 102531, ¶¶5, 22. Counsel can most certainly be found to have performed deficiently for failing to follow precedent from this Court and the District of the appellate court which had jurisdiction over the case at issue.

The State also argues that it is somehow unclear whether or not Rule 608(a)(7) requires the actual jury strikes to be recorded. However, that rule plainly requires that "the court reporting personnel as defined in Rule 46 shall take the record of the proceedings regarding the selection of the jury[.]" Ill. S. Ct. R. 608(a)(7). As discussed above, such proceedings consist of two parts: the questioning of the jury and then the striking or accepting of individual jurors. Each of those parts is rendered meaningless without the other. The process of questioning jurors only exists to allow the parties to intelligently exercise challenges, both for cause and peremptory. Similarly, the act of striking or accepting jurors is a meaningless exercise if the parties do not have the basic information necessary to make determinations about those jurors' qualifications, which information is obtained during the

questioning.

Any review of the jury selection proceedings requires information obtained from *both* parts of that process. When answering the question "was this jury properly selected," no intelligent decision can be made if the reviewing court does not know both the characteristics of the jurors themselves, as revealed during questioning, and the *reasons* why some jurors were removed and others accepted. The State offers no reason why this Court's Rule, should be arbitrarily limited to requiring recording of one half of the relevant proceedings, particularly in light of the fact that the language of the Rule itself contains no such restrictions. To the contrary, such a holding would eviscerate the purpose of the rule itself.

The State bemoans the consequences of requiring every "sidebar" to be held on the record and in the defendant's presence. (St. Br. at 9) Leaving aside any question as to whether having all "sidebars" recorded, or held in the defendant's presence, would be a good and valuable thing for the appellate process, that is not what has been argued in this case. The mere fact that a matter may be dealt with at "sidebar," which is to say out of the jury's hearing, has nothing to do with the issue at hand here.

The State seeks to evade that issue by simply labeling a portion of the proceedings as a "sidebar," and then dismissing them as unimportant. (St. Br. at 9) What happened here was that the circuit court conducted the juror strikes off the record and without Mr. Brown present. These proceedings were an integral part of the jury selection process and Mr. Brown had a right to be present for them. *Bean*, 137 Ill. 2d at 84; *Oliver*, 2012 IL App (1st) 102531,

¶¶5, 22. They were also, as an integral part of the jury selection process, required to be recorded. Ill. S. Ct. R. 608(a)(7). That remains the case whether they occurred at sidebar, in the judge's chambers, or anywhere else. The State's suggestion that Mr. Brown should have simply been told that these sidebars were legal in nature and "d[id] not concern him," demonstrates the absurdity of its attempt to avoid the issue at hand with nothing more than the label "sidebar." (St. Br. at 9) (quoting 1A Criminal Defense Techniques § 24A.06 (Matthew Bender & Co. 2021). The selection of the jury that would decide his guilt or innocence clearly "concerned" Mr. Brown very much.

Mr. Brown has not argued, and need not argue, that every sidebar conference that occurs during a criminal trial requires the presence of the defendant and the court reporter. However, the actual selection of the jury that will decide the defendant's guilt or innocence is a critical portion of that defendant's trial and one which this Court's precedent and Rules require to be performed in the defendant's presence and on the record. *Bean*, 137 Ill. 2d at 84; *Oliver*, 2012 IL App (1st) 102531, ¶¶5, 22; Ill. S. Ct. R. 608(a)(7). Other conceivable "sidebar" conferences are entirely irrelevant to the issue before this Court.

C. Because the court's decision to hold the jury selection conferences off the record, and counsel's acquiescence in that decision, make it impossible for Mr. Brown to show prejudice, prejudice should be presumed in this case in order to preserve Mr. Brown's right to an appeal.

Much of the State's argument on the issue of prejudice relies upon the presumption of regularity discussed above. Those arguments have been

sufficiently addressed and need not be revisited. However, the State makes several other arguments that do require some comment.

The State cavalierly declares that showing prejudice from a claim of ineffective assistance is always difficult and urges this Court to find Mr. Brown's situation no different than any other defendant's. (St. Br. at 15-16) However, the State's argument ignores several of the most important facts about this particular case. Although the State argues that Mr. Brown should be required to "investigate" this matter and then present evidence in a post-conviction petition, it offers no clue as to what such "investigation" might entail. (St. Br. at 15-16) Mr. Brown was not present for the jury strikes and, consequently, has no idea what happened. The court reporter was not present for the jury strikes and so no record of them exists. The only people who could offer any information about what happened during these proceedings are the judge, defense counsel, and the prosecutor. The State has not argued that any of these are plausible sources of evidence to support a post-conviction petition. (St. Br. at 15-16)

These facts distinguish Mr. Brown's case from *People v. Johnson*, 2021 IL 126291. In *Johnson*, there was physical evidence that either existed or did not exist, that being DNA from a swab taken from a firearm. *Johnson*, 2021 IL 126201, ¶58. Such physical evidence can be, and in *Johnson* had been, identified. *Id*. If DNA existed in that sample, it could be tested. *Id*. There are statutory procedures available by which a defendant can investigate and obtain this information. See 725 ILCS 5/116-5 (2021).

The fundamental problem with the State's argument here is that it

ignores the one thing that distinguishes Mr. Brown from Johnson, and most other defendants who find themselves faced with an inadequacy in their record: Mr. Brown himself does not and cannot know what happened and there is no source to which he can turn to obtain that information. There is no swab to be tested here. In fact, there is no objective source of evidence on this subject at all. This is due to no fault of Mr. Brown's, instead it is a direct result of the errors at issue.

The State's discussion of whether or not Mr. Brown enjoys a constitutional right to a verbatim transcript of his jury selection is irrelevant. (St. Br. at 14) As discussed above, Mr. Brown unquestionably did enjoy a right to such a transcript under this Court's Rules, which have the effect of law. Counsel is no less ineffective for sacrificing a defendant's rights at trial when those rights are statutory than when they are constitutional. Moreover, Mr. Brown unquestionably *does* enjoy a constitutional right to a full and fair appeal. *People v. Stark*, 33 Ill. 2d 616, 620-23 (1966); *see also People v. Ramos*, 295 Ill. App. 3d 522, 526-27 (1st Dist. 1998); *People v. Seals*, 14 Ill. App. 3d 413, 413-14 (1st Dist. 1973). Where the lack of a complete record prevents him from receiving such, and where the lack of such a record is not due to any fault of his, that right is violated.

The State attempts to distinguish Mr. Brown's case from *Stark* because the error at issue here was not preserved and because, according to the State, the record in this case "does not provide any reason to suspect that he was prejudiced[.]" (St. Br. at 18-19) To take the second point first, the record gives every reason to presume that Mr. Brown was prejudiced by the

errors of court and counsel. He was excluded from a critical part of his own criminal trial, had no opportunity to participate in the selection of the jury that decided his guilt, and those proceedings have been insulated from review by being held off the record. See *People v. Lindsey*, 201 Ill. 2d 45, 55 (2002) (defendant has a right to be present at every critical stage of trial); *Bean*, 137 Ill 2d at 84 (jury selection is critical stage of trial). And despite the State's bald assertion that Mr. Brown has not shown that a record of those proceedings is "essential" to his appeal, the only substitute it is able to propose is the summary given by the trial court, which the State itself admits is incomplete. (St .Br. at 18-19) At present, Mr. Brown is being completely denied any opportunity to have review of a critical portion of his trial. That is prejudicial in and of itself. See *Ramos*, 295 Ill. App. 3d at 526-27 (reversing and remanding for new trial due to incomplete record, where that incompleteness made it impossible to determine the merits of the defendant's claims).

The State's issue preservation argument is even more flawed. First, *Stark* does not actually note whether the defendant preserved the suppression issue for review or not. *Stark*, 33 Ill. 2d at 620-22. Although there was a pre-trial motion filed, *Stark* makes no mention as to whether or not that issue was raised in a post-trial motion. *Id*. Given that this Court did not even address whether or not the error at issue was preserved, preservation was clearly not a basis for its holding.

Second, the State's argument on this point begs the question and is contrary to well established precedent. The issue under consideration here is

whether or not counsel was ineffective for failing to protect Mr. Brown's right to be present. The State would have this Court rule that Mr. Brown cannot litigate that issue now, because counsel did not litigate the *underlying issue* below. However, as this Court has long acknowledged, these are precisely the circumstances in which many ineffective assistance of counsel claims are appropriately raised: when counsel failed to properly raise an issue below. See e.g. *People v. Simpson*, 2015 IL 116512, ¶¶35-39 (counsel ineffective for failing to properly object to inadmissible evidence); *People v. Pegram*, 124 Ill. 2d 166, 174 (1988) (counsel ineffective for failing to tender appropriate jury instruction).

As it did below, the State once again invokes the notion of a bystander's report in an attempt to convince this Court that Mr. Brown has avenues available to him to complete the record. (St. Br. at 15) However, the State makes no attempt to respond to Mr. Brown's arguments on this point. The fact remains that Mr. Brown cannot offer a proposed bystander's report, because he was not present and does not know what happened. Ill. S. Ct. R. 323(c). The fact also remains that Mr. Brown cannot assess the accuracy of any proposed alternative report of proceedings the State might offer, because he was not present and does not know what happened. *Id*. The combination of errors in this case makes it impossible for Mr. Brown to avail himself of a bystander's report or any other alternative report of proceedings provided for by this Court's rules. The State does not offer any meaningful argument to the contrary.

Mr. Brown was denied his right to be present for every critical stage of

his trial when the trial court conducted the selection of the jurors for his case outside of his presence and off the record. He was denied the effective assistance of counsel when his attorney acquiesced in that process. He was denied his right to a full and fair appeal when the appellate court affirmed his conviction due to his inability to show prejudice from counsel's actions, where that inability was itself a direct result of the court and counsel's actions. Therefore, he respectfully requests that this Court reverse the appellate court, reverse his convictions, and remand this case for a new trial.

CONCLUSION

For the foregoing reasons, Servetus Brown, defendant-appellant, respectfully requests that this Court reverse the judgment of the appellate court, reverse his conviction, and remand this case for a new trial

Respectfully submitted,

DOUGLAS R. HOFF
Deputy Defender

KIERAN M. WIBERG
Assistant Appellate Defender
Office of the State Appellate Defender
First Judicial District
203 N. LaSalle St., 24th Floor
Chicago, IL 60601
(312) 814-5472
1stdistrict.eserve@osad.state.il.us

COUNSEL FOR DEFENDANT-APPELLANT

CERTIFICATE OF COMPLIANCE

I certify that this reply brief conforms to the requirements of Rules 341(a) and (b). The length of this reply brief, excluding pages contained in the Rule 341(d) cover, the Rule 341(h)(1) statement of points and authorities, the Rule 341(c) certificate of compliance, and the certificate of service, is 17 pages.

/s/Kieran M. Wiberg
KIERAN M. WIBERG
Assistant Appellate Defender

No. 126852

IN THE

SUPREME COURT OF ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS, Plaintiff-Appellee, -vs- SERVETUS BROWN, Defendant-Appellant.	)	Appeal from the Appellate Court of Illinois, No. 1-18-0826. There on appeal from the Circuit Court of Cook County, Illinois , No. 17 CR 10469. Honorable Neera Lall Walsh, Judge Presiding.

NOTICE AND PROOF OF SERVICE

Mr. Kwame Raoul, Attorney General, 100 W. Randolph St., 12th Floor, Chicago, IL 60601, eserve.criminalappeals@ilag.gov;

Ms. Kimberly M. Foxx, State's Attorney, Cook County State's Attorney Office, 300 Daley Center, Chicago, IL 60602, eserve.criminalappeals@cookcountyil.gov;

Mr. Servetus Brown, Register No. K99176, Lawrence Correctional Center, 10930 Lawrence Road, Sumner, IL 62466

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct. On December 10, 2021, the Reply Brief was filed with the Clerk of the Supreme Court of Illinois using the court's electronic filing system in the above-entitled cause. Upon acceptance of the filing from this Court, persons named above with identified email addresses will be served using the court's electronic filing system and one copy is being mailed to the defendant-appellant in an envelope deposited in a U.S. mail box in Chicago, Illinois, with proper postage prepaid. Additionally, upon its acceptance by the court's electronic filing system, the undersigned will send 13 copies of the Reply Brief to the Clerk of the above Court.

/s/Carol M. Chatman
LEGAL SECRETARY
Office of the State Appellate Defender
203 N. LaSalle St., 24th Floor
Chicago, IL 60601
(312) 814-5472
Service via email is accepted at
1stdistrict.eserve@osad.state.il.us