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# Local Government Law

The newsletter of the Illinois State Bar Association's Section on Local Government Law

## Walking a tightrope: Navigating panhandling regulation in light of *Reed v. Gilbert*

BY DONNA J. PUGH & HAYLEY L. ALTABEF, FOLEY & LARDNER LLP

**Springfield, Illinois, is a special place.** Most people first hear of Springfield in passing, while furiously memorizing all fifty state capitols for their middle school social studies exam. But Springfield is much more than that to many Americans. People associate it with Abraham Lincoln, the Illinois lawyer who navigated the country through its only civil war. Nine years ago, people again recognized Springfield's historical significance when then-Senator Barack Obama announced his candidacy at the same spot Lincoln had denounced slavery 150 years earlier.

Now, Springfield is making headlines for a different reason: its panhandling ordinances. In 2014, the Seventh Circuit upheld a Springfield panhandling ordinance that outlawed oral pleas for immediate donations in the city's historic downtown district. Then, months later, the Supreme Court changed the landscape of free-speech laws in *Reed v. Town of Gilbert*. The Seventh Circuit has since reversed its decision, and Springfield finds itself seeking a new solution to its panhandling challenges.[1]

The debate over panhandling is complicated. Those who favor fewer panhandling regulations often emphasize the constitutional right to panhandle. Mark Weinberg, an Illinois lawyer who has dedicated his life to representing the homeless, embodies this mindset. When he first saw Chicago's panhandling ordinance, he immediately viewed it as "the city denying beggars free-speech rights."[2] On the other hand, community members and local business owners underscore the economic effects of panhandling. Donning nineteenth century garb, Garret Moffatt pretends to be Lincoln's old friend and bodyguard as he leads tourists through Springfield every day.[3] While sympathetic to peaceful panhandlers, Moffatt takes issue with some of the more aggressive beggars in Springfield. He sees it as "harassment," which creates a public safety issue, discouraging visitors from learning about the town.[4]

This piece focuses on how Illinois municipalities can regulate panhandling while still respecting people's constitutional right to panhandle. Part II of this article



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## Walking a tightrope

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discusses panhandling as non-commercial speech distinct from peddling and aggressive panhandling. Part III explains the Court's decision in *Reed*, and outlines the new standard for content-based speech. Part IV discusses how the Seventh Circuit used *Reed* to overturn its own decision in a panhandling case. Part V examines pre-*Reed* Illinois decisions that upheld panhandling laws, and addresses the possible impact of *Reed* upon these cases. Finally, Part VI suggests ways in which Illinois municipalities can balance their competing obligations to panhandlers and to the larger communities they represent.

### What is Panhandling?

At its core, a person who panhandles stops people on the street to ask for something, usually food or money.[5] There are many ways to panhandle: people can orally ask for help, they can hold up a sign and remain silent, or they can do both. Because this article discusses signage laws, our analysis will focus on people who panhandle using signs.

Panhandling is not peddling.[6] While it is not entirely clear, courts consider peddling—people selling goods or services on the sidewalk or street for money—to be closer to commercial speech, and thus, subject to a lower level of protection.[7] In contrast, courts classify panhandling as protected speech, and the First Amendment guarantees panhandlers' rights "to be there, to deliver their pitch and ask for support."[8]

Most municipalities also treat aggressive panhandling differently from normal panhandling. While each aggressive panhandling ordinance is different, many of these ordinances consider intimidation or physical contact to cross the line. Despite this common theme, municipalities' aggressive panhandling ordinances differ in what they consider aggressive.

Evanston, for instance, has an extensive aggressive panhandling ordinance. It treats panhandling as aggressive when a person touches or follows someone without his or her consent.[9] Repeating a request for money to someone who is purposefully standing still (like when waiting for the bus or sitting in a car) also counts as aggressive.[10] Finally, Evanston's ordinance includes a catchall provision, which outlaws any behavior that "would cause a reasonable person to feel harassed, intimidated, or compelled to contribute."[11]

Similarly, Chicago's aggressive panhandling ordinance includes specific examples of forbidden activities and a general standard against aggressive behavior. Like Evanston, Chicago prohibits touching, following, or blocking passersby without permission.[12] But unlike Evanston, Chicago considers panhandling in groups as inherently aggressive.[13] Finally, Chicago generally defines aggressive panhandling as panhandling "in a manner that a reasonable person would find intimidating."[14]

Some Illinois municipalities, however, consider these behaviors to be part of the general prohibition against panhandling, and not specific to the aggressive panhandling ordinance. Unlike Evanston and Chicago, Carbondale outlaws behavior other municipalities consider aggressive—like panhandling in groups and soliciting money from people in lines, cars, or ATMs—in its general panhandling provision, not under its aggressive panhandling ordinance.[15] In addition, Carbondale does not allow panhandlers to solicit donations from anyone in a line. Evanston and Chicago only forbid this when the passersby do not consent to speak to the panhandler.[16] But, similar to the other Illinois municipalities profiled in this article, Carbondale outlaws any behavior that "would cause a reasonable person to feel threatened, fearful, or compelled."[17] It also prohibits touching, intentionally blocking, or following passersby.[18]

### Understanding *Reed v. Gilbert*

Courts traditionally use a two-step test to determine whether the state can legally limit constitutionally-protected speech. First, courts classify speech as either content-based or content-neutral. Before

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*Reed*, courts often defined content-based laws as laws that discriminated among viewpoints on a particular topic.[19] To guide their analysis, courts considered "whether the government…adopted a regulation of speech *because of* disagreement with the message it convey[ed]."[20] A town that regulated pro-choice signs more strictly than pro-life signs, for example, enforced content-based speech laws.[21] But subjecting abortion-related signage generally to stricter standards would not be content-based regulation.[22]

Second, after determining whether the law is content-neutral or content-based, courts apply the relevant level of scrutiny. If the speech is content-based, it is subject to strict scrutiny, a high bar. Under this standard, the state can only regulate speech if it can show that "regulation is necessary serve a compelling state interest and that it is narrowly drawn to achieve that end."[23] On the other hand, if the speech is content-neutral, courts apply a more relaxed intermediate scrutiny test, which allows the state to limit content-neutral speech as long as the regulation is narrowly tailored to serve a "significant government interest."[24]

Before *Reed*, courts often considered anti-panhandling ordinances to be content-neutral laws that passed intermediate scrutiny.[25] They reasoned that anti-panhandling laws limited expression on one topic, rather than prohibiting a particular perspective on it.[26] What's more, most anti-panhandling laws simply narrowed the time, place and manner that people could panhandle, leaving room for people to panhandle in some areas of the city during some parts of the day.[27] As discussed below, *Reed* changed this free-speech landscape.

Even though *Reed v. Gilbert* broadened courts' understanding of constitutionally-protected panhandling, the case itself had nothing to do with begging for money. Gilbert, Arizona's sign code treated ideological and political signs more favorably than temporary signs that directed people to community events.[28] A local church posted temporary signs to tell its congregation where to gather for services each weekend.[29] But, when it left the signs up for more than one hour after the service, it violated the town's temporary-event sign law.[30] After receiving two citations, the church sued the town under the First Amendment, arguing that the town's laws were content-based, and thus, subject to strict scrutiny.[31]

The town in *Reed* claimed that its laws were content-neutral because they applied irrespective of viewpoint.[32] It argued that even though the sign laws categorized signs by content (political, ideological, or temporary event-based), they did not discriminate based on different perspectives within each category.[33] A sign endorsing one candidate, for example, would receive the same treatment as a sign supporting the opponent.

But the *Reed* Court rejected the town's limited understanding of content-based law. Instead, the Court found that discrimination by topic, rather than just discrimination by viewpoint within a topic, created content-based law.[34] It reasoned that how the town treated a sign "depend[ed] entirely on the communicative content of the sign."[35] Because the town regulated ideological and political signs less harshly than temporary event-based signs, its laws policed signs based on content.

After deciding that the sign code was content-based law, the Court easily found that the law did not pass the strict scrutiny test. The town argued that aesthetic appeal and traffic safety were compelling state interests that justified the law.[36] The Court didn't even bother to examine whether those interests were compelling enough. Instead, it quickly found that the current sign code's distinctions "fail[ed] as hopelessly underinclusive" because event-based signs were not inherently more unattractive or distracting than any other type of sign.[37]

## *Reed's* Impact on Illinois Law

Although *Reed* never mentioned panhandling, its holding clearly reaches municipal panhandling ordinances. Eleven days after deciding *Reed*, the Supreme Court remanded a panhandling case to the First Circuit "for further consideration," signaling to municipalities that they should re-evaluate their panhandling ordinances "in light of *Reed*."[38]

The Seventh Circuit quickly took the hint. Not even two months after *Reed*, it reconsidered its own panhandling case, *Otterson v. City of Springfield*.[39] When it first heard *Otterson* a year before *Reed*, the Seventh Circuit upheld Springfield's panhandling ordinance that outlawed oral pleas for immediate donations in the city's historic downtown district.[40] Notably, the law still allowed individuals in the district to carry signs asking for money or request passersby to send money later.[41] The court used this distinction to show that the government didn't restrict speech "because the government disapprove[d] of the *message*;" it merely saw signs and requests for later donations as less aggressive than pleas for immediate donations.[42] What's more, the court categorized oral pleas for immediate assistance as a general topic that didn't favor one side. It noted that if the law forbid oral pleas based on the speaker's perspective—potentially as a homeless or jobless person—it would be content-based.[43]

On remand, the Seventh Circuit reversed. It recognized *Reed*'s seismic effect on panhandling and free speech: no longer did "the absence of an effort to burden unpopular ideas impl[y] the absence of content discrimination."[44] Content neutrality required more. Because Springfield's law regulated speech based on the topic of panhandling, it was not content-neutral, regardless of whether it discriminated among individual panhandlers' views.[45] That Springfield's law only applied to immediate requests no longer affected its content-neutrality. Rather, the law's scope could only help the city argue that the law was narrowly tailored enough to pass strict scrutiny.[46]

Since the Seventh Circuit's verdict, Springfield has tried to reverse the tide. First, it filed a writ of certiorari, which the United States Supreme Court rejected.[47] Then, Springfield aldermen approved a new law requiring panhandlers to be at least five feet away from the people they were asking for money.[48] But the city will not enforce the law until the U.S. District Court examines its constitutionality, currently set for a hearing in 2017.[49]

## Illinois Cases Before *Reed*

In 2015, the United States Supreme Court's unanimous decision in *Reed* dramatically expanded First Amendment protections for panhandlers. Although the expansion of free speech protections for panhandlers took effect at a national level just last year, the decisions from Illinois cases on the constitutionality of panhandling ordinances have foreshadowed the shift towards expansion throughout the last decade. Prior to 2002, it was not uncommon for the City of Chicago to arrest homeless persons for panhandling under section 8-4-010(f) of the Chicago Municipal Code.[50] For example, Jessie Thompson, Ronald Davis, and Nadine Buchanan were repeatedly given tickets or arrested pursuant to section 8-4-010(f) for panhandling on public sidewalks around the City of Chicago.[51] Consequently, in *Thompson v. City of Chicago*,[52] Mr. Thompson, Mr. Davis and Ms. Buchanan together brought suit against the City of Chicago claiming a violation of their First Amendment rights on the grounds that the prohibition is a broad sweeping ban on any "public ways."[53]

To successfully plead a claim for violation of the First Amendment against a municipality, plaintiffs must "allege that they sustained or are immediately in danger of sustaining a specific, direct injury from a government policy that chills the exercise of their First Amendment rights."[54] The injury caused by the government policy must present an "objective harm or threat" rather than a subjective allegation.[55] Mr. Thompson, Mr. Davis, and Ms. Buchanan alleged that, in addition to the ordinance, the City had a custom and practice of harassing and reprimanding homeless persons for panhandling on public sidewalks in Chicago.[56] Correspondingly, the Northern District of Illinois held that Mr. Thompson, Mr. Davis, and Ms. Buchanan sufficiently alleged an objective barrier – the City's customs and practice of harassing panhandlers – to their First Amendment right to panhandle on public sidewalks.[57] *Thompson* ultimately settled with the City of Chicago paying $99,000 in damages and an additional $375,000 in attorney fees and administrative costs.[58]

Chicagoans who regularly pass through the Daley Plaza located at the heart of downtown Chicago have likely passed by panhandler Kim Pindak at one point or another. Beginning as early as 2009, Mr. Pindak panhandled at the Daley Plaza to supplement the public assistance he was receiving.[59] At the Daley Plaza, Mr. Pindak would stand with a cup in hand and peacefully ask every pedestrian who walked by the same question, "Can you spare some change?"[60] The sheriff's officers repeatedly informed Mr. Pindak that it was illegal to panhandle inside the Daley Plaza, and even once escorted him off the property.[61] In 2010, Mr. Pindak brought suit against the Sheriff of Cook County alleging that his First Amendment rights had been violated.[62]

Prior to *Reed*, any law that did not ban all panhandling could arguably be understood as a "time, place, or manner regulation," and as such, the enforcement of such law did not violate the First Amendment.[63] In *Pindak v. Dart*, Mr. Pindak claimed that his First Amendment rights were violated on the grounds that the ban on panhandling imposed a "blanket prohibition on peaceful panhandling" within the Daley Plaza.[64] In 2011, in denying the City's motion to dismiss, the Illinois Northern District Court held that whether the prohibition was a "time, place, or manner regulation" was a question of fact for the jury.[65] The distinction prior to *Reed* was that if the policy behind the ordinance addressed the *type* of speech, then the policy may be deemed as content-based and presumptively in violation of First Amendment.[66] On the other hand, even if a policy was content-neutral, the court may still require proof of evidence that the law is "'narrowly tailored to serve a significant government interest' and 'leaves open ample alternative channels of communication.'"[67] In 2015, post-*Reed*, the City of Chicago filed for summary judgment and the Illinois Northern District Court had a chance to reexamine the case under the expansion of free speech protections offered to panhandlers.[68] However, since "the right must have been "clearly established at the time of the defendant's alleged misconduct" and *Reed* was decided after Mr. Pindak's complaint, the court did not conduct an analysis under *Reed*'s new rule.[69] The case ultimately went to trial and the jury awarded Mr. Pindak $1,500 in damages.[70] Before *Reed*, Illinois courts were already taking steps towards offering greater protections for panhandlers.

## Advice to Illinois Municipalities

Even though *Reed* limits how municipalities can control panhandling, it does not erase regulation all together. Municipalities can still monitor panhandling while respecting the individual's right to panhandle by (1) structuring panhandling ordinances in anticipation of strict scrutiny analysis, namely by targeting aggressive panhandling, and (2) limiting signage by form, rather than substance.

First, municipalizes should expect Illinois courts to likely see all panhandling laws as content-based. Instead of claiming that the laws are content-neutral, municipalities should focus on justifying these laws under the strict scrutiny standard. In *Norton v. Springfield*, the Seventh Circuit pushed municipalities toward this analysis. There, Springfield argued that, because its prohibition only applied to oral requests for immediate donations, the law was not content-based.[71] After *Reed*, the Seventh Circuit rejected this. It found that Springfield's attempt to narrow the ordinance's scope "now pertain[ed] to the justification stage of the analysis rather than the classification stage."[72] Since Springfield didn't use the law's limited application as evidence that it was narrowly tailored, the court didn't consider it.

To avoid this is the future, municipalities should draft panhandling ordinances with strict scrutiny analysis in mind. Principally, they should tailor their anti-panhandling ordinances to regulate aggressive panhandling. Since *Reed*, at least one federal court has found public safety to be a compelling state interest that justifies outlawing this type of panhandling.[73] In that case, the court struck down the city's restrictions on when and where panhandlers could solicit donations because

the city did not show that panhandlers who violated these rules threatened public safety.[74] But not even the panhandler-plaintiffs dared challenge the prohibition on aggressive panhandling.[75] Similarly, after the *Reed* decision, the ACLU challenged another city's general panhandling ban, but did not attack the sections prohibiting aggressive and menacing panhandling.[76] Together, these strategic decisions suggest that everyone involved in this discussion, even panhandlers and the lawyers advising them, believe aggressive panhandling laws will remain constitutional.

But just labeling an existing ordinance as "aggressive panhandling" isn't enough to pass strict scrutiny. Municipalities should narrowly tailor the ordinances to specific types of aggressive behavior. For example, municipalities should look to municipalities like Evanston and Chicago, whose panhandling ordinances detail the specific ways in which a panhandler might be threatening.[77] In so doing, municipalities can show that their laws are narrowly tailored to the government's interest in public safety. Casting a broad prohibition over all aggressive panhandling likely won't pass strict scrutiny.

Outside of enacting aggressive panhandling ordinances, municipalities may consider developing a comprehensive legislative history to document the process by which they create these laws. If municipalities face a law suit, they will be able to rely upon these records to show that they drafted the ordinance as narrowly as possible. If available, municipalities could even use data from police departments to learn what types of aggressive behaviors occur most often. If they ever faced litigation later on, they could point to the data as a justification for why the law was necessary.

Second, municipalities can regulate panhandling signs by making rules about their physical format. Both the majority and Alito's concurrence in *Reed* acknowledged that municipalities still have the power to oversee these content-neutral aspects of signage. The majority, for example, noted that codes can still regulate signs by size, building materials, lighting, moving parts, and portability.[78] The concurrence highlighted even more options: a municipality can distinguish between written and electronic signs, on-premises and off-premises signs, and signs for one-time events.[79]

To curb panhandling using these format-based laws, municipalities should impose restrictions on all personal signs on sidewalks, not just on signs asking for donations. While these blanket regulations will affect panhandlers, they will also apply to protestors and anyone else looking to hold up a sign on the sidewalk. Since a regulation can be content-neutral "even if it has an incidental effect on some speakers or messages," these laws would not be subject to strict scrutiny.[80] But, municipalities should be careful not to be too heavy-handed with their regulations. As discussed above, content-neutral laws must still pass intermediate scrutiny.[81] A law banning all hand-held signs, for instance, would likely fail this test.

## Conclusion

*Reed* affirmed what some Illinois courts predicted more than a decade before: the Constitution collided with anti-panhandling ordinances, and the Constitution won. Anti-panhandling laws used to easily pass intermediate scrutiny. After *Reed*, very few of them will survive the new strict scrutiny test. In the wake of this shift, Illinois municipalities need to change their strategy for addressing panhandling. Walking the tightrope between an individual's right to panhandle and the municipality's obligation to respond to community needs is challenging. *Reed* has made it even more difficult. To balance these competing interests, municipalities should (1) create panhandling ordinances that comply with strict scrutiny, principally by drafting aggressive panhandling ordinances; and (2) regulate all free-speech signs by format. ■

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4. *Id.*
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7. *Gresham v. Peterson*, 225 F.3d 889, 904 (7th Cir. 2000) (opining that commercial speech is "lower on the First Amendment food chain, somewhere between political speech and pornography."); *Peterson v. Vill. Of Downers Grove,* No. 14 C 9851, 2015 U.S. Dist. LEXIS 167483, at *35-36 (N.D. Ill. Dec. 14, 2015) (finding that *Reed* does not apply to commercial speech).
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10. *Id.*
11. *Id.*
12. Chicago, Il., Code §8-4-025(b) (2004).
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14. *Id.*
15. *Id.*
16. *See* Evanston, Il., Code §9-5-25(c) (2016) and Chicago, Il., Code §8-4-025(b) (2004).
17. *Id.*
18. Carbondale, Il., Code §14/4/10(A) (2012).
19. *See e.g., Ward v. Rock Against Racism*, 491 U.S. 781, 791 (1989).
20. *Id.* (emphasis added).
21. *Norton v. City of Springfield*, 806 F.3d 411, 413 (7th Cir. 2015) (Manion, concurring).
22. *Id.*
23. *Perry Educ. Ass'n v. Perry Local Educators' Ass'n*, 460 U.S. 37, 45 (1983) (citing *Carey v. Brown*, 447 U.S. 455, 461 (1980)).
24. *Id.* (citing *United States Postal Service* v. *Council of Greenburgh Civic Assns*., 453 U.S. 114, 132 (1981); *Consolidated Edison Co. v. Public Service Comm'n*, 447 U.S. 530, 535-536 (1980); *Grayned v. City of Rockford*, 408 U.S. 104, 115 (1972); *Cantwell v. Connecticut*, 310 U.S. 296 (1940); *Schneider v. State*, 308 U.S. 147 (1939)).
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30. *Id.* at 2225.
31. *Id.* at 2226.
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36. *Id.* at 2231-32.
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38. *Thayer v. City of Worcester*, 135 S. Ct. 2887, 2887 (2015).
39. *Otterson v. City of Springfield*, 768 F.3d 713 (7th Cir. 2014). Note that when *Otterson* returned to the Seventh Circuit, it had been renamed, "*Norton v. City of Springfield*."
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41. *Id.*
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45. *Id.*
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79. *Reed,* 135 S. Ct. 2233 (Alito, concurring).
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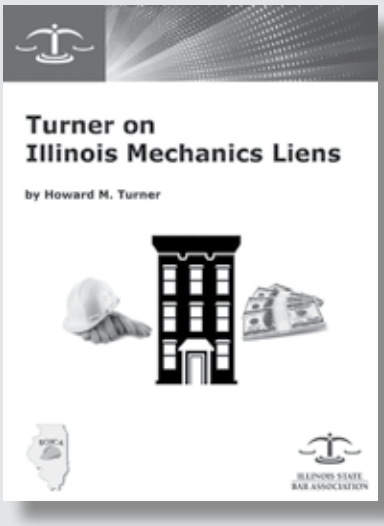


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## September

**Thursday, 09/01/16- Webinar**—Introduction to Legal Research on Fastcase. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 12:00- 1:00 pm.

**Thursday, 09/08/16- Webinar—**Advanced Tips for Enhanced Legal Research on Fastcase. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 12:00- 1:00 pm.

**Thursday, 09/08/16- Webcast**—Monetizing Intellectual Property. Presented by IP. 12:30 p.m. – 2:15 p.m.

**Friday, 09-09-2016- Webcast**—Telemedicine: Diagnosing the Legal Problems. Presented by Health Care. 9:00 a.m. – 11:00 a.m.

**Wednesday, 09/14/16- Webcast**—Hot Topic: Union Dues/Fair Share—Friedrichs v. California Teachers Association. Presented by Labor and Employment. 10:00 a.m. – 12:00 p.m.

**Wednesday, 09-14-16—Webinar**—2016 Military Law Overview. Presented by Military Affairs. 12:00 p.m. – 1:15 p.m. (maybe later).

**Thursday, 09/15/16- CRO**—Family Law Table Clinic Series (Series 1). Presented by Family Law. 8:30 am – 3:10 pm. Vid: NONE THESE WILL NOT BE RECORDED OR ARCHIVED.

**Friday, 09-16-06- CRO and Live Webcast**—The Fear Factor: How Good Lawyers Get Into (and avoid) Bad Ethical Trouble. Master Series Presented by the ISBA—WILL NOT BE RECORDED OR ARCHIVED. 9:00 a.m. – 12:15 p.m.

**Wednesday, 09-21-16—Webcast**—Restorative Practice in Illinois: Practical and Creative Alternatives to Resolve Civil and Criminal Matters. Presented by Human Rights. Part 1- 10:00 a.m. – 12:00 p.m. Part 2- 1:00 p.m. – 3:00 p.m.

**Thursday, 09-22-16- Webcast**—Family Law Changes and Mediation Practice. Presented by Women and the Law. 11:00 a.m. – 12:00 p.m.

**Thursday, 09/22/16- CRO and Webcast**—Recent Developments in E-Discovery in Litigation. Presented by Antitrust. 1:00- 5:15 pm.

**Thursday, 09/22/16- Webinar**—Introduction to Boolean (Keyword) Searches for Lawyers. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 12:00- 1:00 pm.

**Monday, 09/26/16- Friday, 09/30/16—CRO**—40 Hour Mediation/Arbitration Training Master Series. Presented by the ISBA. 8:30 am – 5:45 pm each day. MASTER SERIES WILL NOT BE ARCHIVED.

**Friday, 09-30-16—DoubleTree Springfield**—Solo and Small Firm Practice Institute Series. A Balancing Act: Technology and Practice Management Solutions. Presented by GP, SSF. 8:00 a.m. – 5:10 p.m.

## October

**Wednesday, 10-05-16—CRO—**Cybersecurity: Protecting Your Clients and Your Firm. Presented by Business Advice and Financial Planning; co-sponsored by IP (tentative). 9:00 a.m. – 5:00 p.m.

**Thursday, 10/06/16- Webinar—**Introduction to Legal Research on Fastcase. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 12:00- 1:00 pm.

**Thursday, 10-06-16—Webcast—**Nuts and Bolts of EEOC Practice. Presented by Labor and Employment. 11:00 a.m. – 12:30 p.m.

**Monday, 10-10-16—CRO and Fairview Heights, Four Points Sheraton**—What You Need to Know to Practice before the IWCC. Presented by Workers Compensation. 9:00 a.m. – 4:00 p.m.

**Thursday, 10/13/16- Webinar—**Advanced Tips for Enhanced Legal Research on Fastcase. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 12:00- 1:00 pm.

**Thursday, 10-13-16—IPHCA, Springfield**—Open Meetings Act: Conducting the Public's Business Properly. Presented by Government Lawyers. 12:30 – 4:00 p.m. This program will not be recorded and put in the archives.

**Thursday, 10-13-16—CRO and webcast**—Limited Scope Representation: When Less is More. Presented by Delivery of Legal Services. 1:00 p.m. – 5:00 p.m.

**Wednesday, 10-19-2016**—Webcast—Tips for Combating Compassion Fatigue. Presented by Women and the Law. 10 a.m. – 11 a.m.

**Wednesday, 10-19-16- CRO and Live Webcast**—From Legal Practice to What's Next: The Boomer-Lawyer's Guide to Smooth Career Transition. Presented by Senior Lawyers. 12:00 p.m. to 5:00 p.m.

**Thursday, 10/20/16- Webinar—**Introduction to Boolean (Keyword) Searches for Lawyers. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 12:00- 1:00 pm. ■

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