



ILLINOIS STATE BAR ASSOCIATION

ADMINISTRATIVE LAW

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

Chair's column: Words matter

By Carl R. Draper, Springfield, IL, cdraper@feldman-wasser.com

In my final Chair's Column for this newsletter, I started reflecting on what I have learned in my career in the practice of administrative law. Recently, newsletter topics have included important cases that focused on the strict compliance requirements of the Administrative Review Law. In just the last issue, articles were written analyzing the appellate court decision that found that the 2008 amendments to the Administrative Review Law did not provide an avenue for relief for a party who misnamed the administrative agency in a complaint for administrative review. *Mannheim School Dist. #83 v. Teachers' Retirement*

System of Illinois, 2015 IL App (4th) 140531 - analyzed in the May 2015 Newsletter. Earlier articles analyzed the need to fully exhaust administrative remedies including pursuit of any available motion for reconsideration as a prerequisite to seeking judicial review. *Burns v. Department of Insurance*, 2013 IL App (1st) 122449. By contrast, however, administrative agencies have recently been given some wide latitude in meeting statutory deadlines. *Sloper v. City of Chicago*, 2014 IL App (1st) 140712. This stands in contrast to a Su-

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Case summaries

By Hon. Edward J. Schoenbaum

Illinois Supreme Court

Pensions

***In re Pension Reform Litigation*, 2015 IL 118585 (May 8, 2015) Sangamon Co. (KARMEIER) Circuit court affirmed**

Public Act 98-599 amends Illinois Pension Code by reducing retirement annuity benefits for persons who first became members of four of Illinois' five-State-funded pension systems prior to 1/1/11. Annuity reduction provisions of Public Act 98-599 violate pension protection clause (article XIII, section 5) of Illinois constitution, and those provisions are void and unenforceable. As annuity reduction provisions are core purpose of the Public Act, to leave remaining provisions standing would yield legislation package that no longer reflects legislature's intent. Thus, Public Act 98-599 is void and unenforceable in its entirety. (GARMAN, FREEMAN, THOMAS, KILBRIDE, BURKE, and THEIS, concurring).

Illinois Appellate Court

Abuse and Neglect 3d Dist.

***In re S.W. and S.W.*, 2015 IL App (3d) 140981 (May 26, 2015) Peoria Co. (SCHMIDT) Affirmed**

After court found Respondent mother's two minor children neglected, court within its discretion in denying Respondent mother's motions to continue, and in proceeding with fitness hearing after discharging her final appointed attorney who had stated he was ready to proceed to fitness hearing, and in conducting best interests hearing in Respondent's absence but with prior notice to her. Respondent fired all four of her court-appointed attorneys, each time expressing her dissatisfaction with their representation, and Respondent stated that she would find private counsel but failed to do so. (McDADE and LYTTON, concurring).

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Chair's column: Words matter

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preme Court decision holding DCFS strictly accountable to meeting its deadlines for investigations and the administrative hearing process. *Lyon v. DCFS*, 209 Ill. 2d 264 (2004).

Sometimes, I have found it difficult to reconcile the cases where strict compliance requirements seem harsh when they are applied in a manner that precludes any right to even seek judicial review while sometimes giving latitude to government agencies. In reality, however, I think the lesson to be learned is that words matter.

Administrative law is strictly a statutory process. Administrative agencies or units of government can only conduct administrative investigations or hearings if authorized to do so by law. When they do, compliance with the law is necessary. A fundamental tenet of administrative law is that an agency has only the powers conferred by statute along with the reasonably implied powers that are necessary to carry out statutory mandates. Likewise, the process for any judicial review of administrative action is statutory in its nature, and the courts, therefore, only have power to review decisions when review is sought in conformity with the statutory procedure of all cases covered by the Administrative Review Law.

Not only in administrative law cases, but also election law and other areas, courts have dealt with various requirements and analyzed the statutory requirements as either mandatory or directory. Mandatory provisions carry heavy consequences for noncompliance. Directory requirements are to be followed, but efforts to comply in good

faith may excuse some shortcomings.

It might be tempting to characterize some of the various court opinions as unfair when a case is dismissed, keeping in mind that such events sometimes happen to governmental bodies as well as to individuals. The takeaway lesson, however, is to remember that words matter. The courts struggle with the meaning of rules or statutory provisions. At an elementary level, words are ordinarily given their plain meaning and enforced as written whenever possible. The courts seem to be reminding government officials and attorneys that care must be taken in drafting legislation and rules so that the courts can interpret them as they were intended without resorting to rules of statutory construction. This principle applies to lawyers in all fields. We regularly write legal arguments, briefs, agreements, and other documents with legal consequences. When we do, it is important to use as much precision as possible. Perhaps this leads to the temptation of over-writing in order to address all contingencies.

The law requires discipline. Discipline can be as useful in our daily lives as in our careers. After many years of practicing administrative law, I hope to be more mindful of the need to be careful with the things we say and the words we use to convey our meaning. By being clear, objective, and forthright, perhaps we will all lead better lives and be better lawyers. ■

Carl R. Draper is an attorney in Springfield, Illinois practicing administrative law, employment law, and civil rights at the firm FeldmanWasser.



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The articles in this newsletter are not intended to be used and may not be relied on for penalty avoidance.

Postmaster: Please send address changes to the Illinois State Bar Association, 424 S. 2nd St., Springfield, IL 62701-1779.

Case summaries

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Abuse and Neglect 1st Dist.

***In re Marianna F.-M.*, 2015 IL App (1st) 142897 (May 8, 2015) Cook Co., 5th Div. (McBRIDE) Reversed in part and vacated in part; remanded**

Court entered order, after adjudicatory hearing and same-day dispositional hearing, finding that father of minor, then age 6, was fit, willing, and able to parent minor, and returned minor home to him under order of protective supervision. Finding was against manifest weight of evidence, as court concluded that minor was abused due to excessive corporal punishment and substantial risk of physical injury caused by father, based on physician's opinion that her injuries were non-accidental and her bruising was inconsistent with father's explanation for injuries. Father made insufficient progress in therapy to parent minor. (PALMER and GORDON, concurring).

Administrative Review 4th Dist.

***The Sierra Club v. The Office of Mines and Minerals of the Department of Natural Resources*, 2015 IL App (4th) 140405 (March 5, 2015) Sangamon Co. (TURNER) Affirmed**

(Modified upon denial of rehearing 5/15/15). Department of Natural Resources's Office of Mines and Minerals granted permit for open-pit surface mining adjacent to Starved Rock State Park. Plaintiffs filed petition for administrative review, with claims of due process, certiorari, and mandamus based on Department's actions during permit-application process. Plaintiff organizations lack standing as they were not named parties of record during administrative proceeding. Where county board failed to request a public hearing, Mining Act does not provide for involvement of any other parties during permit-application process. (POPE and STEIGMANN, concurring).

Administrative Review 1st Dist.

***Gernaga v. City of Chicago*, 2015 IL App (1st) 130272 (May 8, 2015) Cook Co., 6th Div. (HALL) Reversed**

Plaintiff sought administrative review of decision of City's Department of Administrative Hearings finding him liable for violating Municipal Code ordinance known as "Auto-

mated Red Light Camera Program." Plaintiff's expert testified that short durations of yellow light at intersection were not in compliance with city, state and federal regulations. ALJ's finding of liability was not against manifest weight of evidence. Undisputed photographic and video evidence showed that Plaintiff's vehicle entered intersection after traffic signal turned red, which was prima facie evidence of a red-light traffic violation under Section 9-102-020(d) of Municipal Code. Reliability of expert was called into question by mathematical error and conflict between expert's testimony and affidavit. (HOFFMAN and ROCHFORD, concurring).

Administrative Review 1st Dist.

***Wortham v. The City of Chicago Department of Administrative Hearings*, 2015 IL App (1st) 131735 (May 1, 2015) Cook Co., 5th Div. (PALMER) Affirmed**

City's Department of Administrative Hearings found that three Rottweilers owned by Plaintiff were "dangerous animals" under section 7-12-020 of City Municipal Code. Dogs broke away from Plaintiff while she was walking them, and attacked unleashed pit bull in unfenced portion of yard. Plain language of Code limits provocation to situations where "a person" provokes a dog. Determination of whether a certain animal "is a dangerous animal" depends on all of that animal's behaviors rather than in one instance, and ALJ may consider other incidents involving that animal. (McBRIDE and REYES, concurring).

Collective Bargaining Agreements 1st Dist.

***AFSCME Council 31 v. The State of Illinois*, 2015 IL App (1st) 133454 (May 19, 2015) Cook Co., 2d Div. (SIMON) Affirmed**

Section 6.1 of Illinois Public Labor Relations Act narrowed class of state employees who could be considered "public employees," and set up process for Governor to designate certain number of positions as excluded from collective bargaining units, and exempted certain positions from designation. Section 6.1 is efficient tool to give Governor authority to reassign employees whose positions were incompatible with collective bargaining unit membership, which is a reasonable method to achieve direct objective of Act. State has legitimate interest in efficiency of state gov-

ernment and rational basis for treating some top-level managers differently than other managerial-type workers, and thus Section 6.1 does not violate individuals' equal protection rights, and it does not constitute impermissible impairment of contract. (NEVILLE and PIERCE, concurring).

Disability Benefits 1st Dist.

***Majid v. The Retirement Board of the Policemen's Annuity and Benefit Fund of the City of Chicago*, (May 22, 2015) Cook Co., 6th Div. (HALL) Affirmed**

Retirement Board terminated Plaintiff's disability benefit. Plaintiff had been police officer until he was injured and awarded line-of-duty disability benefit, and was later convicted of a felony (possession of unregistered firearm). Section 5-227 of Illinois Pension Code does not deny Plaintiff his constitutional right to equal protection. As a police officer receiving disability benefits, Plaintiff is not similarly situated to a person retired from police force. Forfeiture of benefits required of police officers receiving disability benefits upon conviction of any felony without requiring that felony relate to, arise out of or in connection with officer's police service is rationally related to and furthers the purpose of Section 5-227. (LAMPKIN and ROCHFORD, concurring).

Election Code 1st Dist.

***Williams v. Cook County Officers Electoral Board*, 2015 IL App (1st) 150568 (May 13, 2015) Cook Co., 3d Div. (LAVIN) Affirmed**

Petitioner's prior Indiana conviction for aiding and abetting a forgery is considered an infamous crime, rendering him ineligible to hold office of school board member. As Petitioner was ineligible to serve as school board member at time he filed his nomination papers, Electoral Board properly removed his name from ballot. Evidentiary hearing on objections to petition was not required, as argument related to question of law, not a factual dispute. (PUCINSKI and HYMAN, concurring).

Foreclosure 1st Dist.

***Baker v. The Forest of Preserve District of Cook County*, 2015 IL App (1st) 141457 (May 18, 2015) Cook Co., 1st Div. (CONNORS) Affirmed**

Forest Preserve District of Cook County

has statutory authority, under Cook County Forest Preserve District Act, to acquire property in foreclosure by purchasing mortgage note and subsequently bidding on property at foreclosure sale. Ultimate purpose of Forest Preserve District's purchase of mortgage note was creation of a forest preserve, not acquired for profit but for a public purpose. (DELORT and CUNNINGHAM, concurring).

Ordinances 5th Dist.

***Carter v. The City of Alton*, 2015 IL App (5th) 130544 (May 4, 2015) Madison Co. (CHAPMAN) Reversed and remanded**

Municipal ordinances in four Illinois cities allow local police departments to charge vehicle owners "administrative fee" when their vehicles are impounded or towed. Plaintiffs filed complaints against cities, arguing that ordinances are invalid as fees charged do not bear reasonable relationship to cities' actual administrative costs. Court erred in dismissing cases, as cities failed to assert affirmative matter to preclude cases from going forward; and taking allegations as true, complaints each state basis upon which relief can be granted. (SCHWARM, concurring; MOORE, specially concurring).

Pension Code 2d Dist.

***Bremer v. City of Rockford*, 2015 IL App (2d) 130920 (April 27, 2015) Winnebago Co. (BURKE) Affirmed in part, reversed in part, and vacated in part; remanded**

(Court opinion corrected 5/5/15). City firefighter suffering from heart condition obtained occupational disease disability pension under Section 4-110.1 of Illinois Pension Code, and court ruled that pension qualified him for benefits under Section 10 of Benefits Act. Plaintiff is not entitled to recover attorney fees under Wage Actions Act, because even if he prevails on his claim for post employment health care benefits under Benefits Act, those benefits would not qualify as "wages earned and due and owing according to terms of the employment." Plaintiff's claim for unpaid health insurance premiums and medical expenses is not ripe for adjudication, as there is no longer a judgment requiring City to pay health insurance premiums for Plaintiff or his wife. "Catastrophic injury" in Section 10(a) of Benefits Act is "synonymous" with injury or disease resulting in pension under Section 4-110.1 of Pension Code. (JORGENSEN, concurring; McLAREN, concurring in part and dissenting in part).

Preemption 1st Dist.

***Durica v. Commonwealth Edison Company*, 2015 IL App (1st) 140076 (March 30, 2015) Cook Co., 1st Div. (CUNNINGHAM) Reversed and remanded**

(Court opinion corrected 5/15/15). Court erred in dismissing complaint per Section 2-619(a)(1), in finding that Illinois Commerce Commission (ICC) had exclusive jurisdiction over their claims against ComEd and tree service company, for removing several 25-foot pine trees from their property, which they had planted to reduce noise and dust from freight train traffic abutting their property. Although ICC has sole authority to hear complaints for violation of Section 8-505.1(a) of Public Utilities Act, that Act does not preempt property owners' rights to assert independent tort claims arising from same conduct, and does not preclude common law remedy of monetary damages otherwise available. (CONNORS and HARRIS, concurring).

Public Utilities Act 2d Dist.

***Citizens Utility Board v. Illinois Commerce Commission*, 2015 IL App (2d) 130817 (May 14, 2015) ICC (SCHOSTOK) Affirmed**

(Court opinion corrected 5/21/15). After review of alternative rate regulation program pursuant to Section 9-244(c) of Public Utilities Act, Illinois Commerce Commission ordered Nicor Gas to refund \$72.14 million to its customers based on certain improprieties during program. Citizens Utility Board appealed arguing that Commission applied improper standard of proof and that customers are entitled to additional \$155 million in damages. A general allegation about proper standard of proof and general allegation that Commission was acting arbitrarily and capriciously were not sufficient to put Commission on notice of contention on appeal that it applied improper standard of proof. Commission's decision as to Nicor's storage withdrawal activity was supported by substantial evidence. (HUTCHINSON and BURKE, concurring).

Unemployment Insurance 1st Dist.

***Weinberg v. The Department of Employment Security*, 2015 IL App (1st) 140490 (May 11, 2015) Cook Co., 1st Div. (CUNNINGHAM) Reversed**

IDES Board of Review properly found that Plaintiff, an equity sales representative who had become a principal in the company, was ineligible for unemployment benefits, because his compensation as a partner did

not constitute wages as defined by Section 5009(E) of the Unemployment Insurance Act. Record contains much evidence of Plaintiff's partnership status, including partnership agreement he signed, compensation includes guaranteed payment derived from partnership profits, and monthly amount based on client base, and tax reporting. (DELORT and HARRIS, concurring).

Unemployment Insurance 1st Dist.

***L.A. McMahon Building Maintenance, Inc. v. Department of Employment Security*, 2015 IL App (1st) 133227 (May 7, 2015) Cook Co., 4th Div. (FITZGERALD SMITH) Affirmed**

IDES properly determined that window washers who performed services for Plaintiff company were employees for purposes of Unemployment Insurance Act. Only the elements of Section 212 of that Act, rather than fact of independent contractor agreements between company and window washers, dictate whether relationship is that of employer-employee or that of employer and independent contractor. Inability to satisfy any one Section 212 condition will defeat company's claim for independent-contractor exemption. Although they were not required to wear company uniform, window washers represent company's interests when they provide services at customers' homes, provide customers with company business cards and invoices, and provide window washing services to customers' and company's specifications. (HOWSE and COBBS, concurring).

Workers' Compensation 1st Dist.

***Steel & Machinery Transportation, Inc. v. Illinois Workers Compensation Commission*, 2015 IL App (1st) 133985WC (May 1, 2015) Cook Co., WC Div. (HUDSON) Affirmed**

Illinois Workers' Compensation Commission properly awarded benefits to claimant, an over-the-road truck driver who owns a tractor-trailer, and in finding that an employer-employee relationship existed. Claimant was in accident in Illinois while transporting load of machinery and metal products, having been dispatched by Respondent to transport shipment from Indiana to Wisconsin. Claimant's ownership of tractor-trailer was in name only, and control Respondent had over equipment is indicative of an employment relationship. "Independent Contractor Agreement" signed by parties indicated that Claimant's ability to haul for another carrier was subject to many conditions; Claimant

hauled exclusively for Respondent from hire date to accident date; and Respondent had sole discretion to interchange equipment Respondent leased from Claimant to other authorized carriers. (HOFFMAN, HARRIS, and STEWART, concurring).

Workers' Compensation 1st Dist.

***Loyola University of Chicago v. Illinois Workers Compensation Commission*, 2015 IL App (1st) 130984WC (May 1, 2015)**
Cook Co., WC Div. (HUDSON) Affirmed in part and reversed in part

Illinois Workers' Compensation Commission approved settlement contract, and neither party sought judicial review; thus, settlement contract constitutes a final award under Workers' Compensation Act. Claimant thereafter filed petition for penalties pursuant to Sections 19(k) and 19(l) of the Act, and for attorney fees under Section 16 of the Act. Commission correctly concluded that Respondent is liable for reimbursement of overpayment of long-term disability payments made to claimant by CIGNA. Commission was authorized to address claimant's petition, and Commission had jurisdiction to interpret settlement contract in conjunction with deciding claimant's petition for penalties and attorney fees. Commission had jurisdiction to construe settlement contract, and to consider claimant's petition for penalties and attorney fees. Commission properly found that claimant failed to prove that Respondent's interpretation of settlement contract was unreasonable or vexatious. (HOLDRIDGE, HOFFMAN, HARRIS, and STEWART, concurring).

Workers' Compensation 4th Dist.

***Bell v. Illinois Workers Compensation Commission*, 2015 IL App (4th) 140028WC (May 1, 2015)**
Coles Co. (HOLDRIDGE) Reversed and remanded

Clerical worker filed workers' compensation claim for injuries in slip and fall in employer's parking lot. Prior to arbitration hearing, claimant died of caused unrelated to work accident. Claimant's estate may seek and obtain permanent partial disability (PPD) benefits that had accrued and were payable, due, and owing to claimant prior to her death. Benefits that accrue before injured employee's death are payable to estate regardless of dependency. PPD benefits are compensation for diminishment of employee's earning capacity caused by work-related injury. (HOFFMAN, HUDSON, HARRIS, and STEWART, concurring).

Federal Court Cases

7th Circuit

Social Security

***Engstrand v. Colvin*, No. 14-2702 (June 4, 2015) W.D. Wisc. Reversed and remanded**

Record failed to support ALJ's denial of claimant's application for SSI disability benefits based on his pain associated with diabetic neuropathy and osteoarthritis. While ALJ did not find claimant credible with respect to his pain complaints associated with his diabetic neuropathy, ALJ improperly based said finding on claimant's ability to feel 10-gram monofilament, where there was no medical evidence to suggest that said ability would contradict claimant's pain complaints. Fact that claimant used medications sporadically did not require different result where ALJ had failed to inquire why claimant may not have been fully compliant with his medications. Moreover, ALJ wrongly evaluated significance of claimant's ability to perform certain daily tasks.

Aliens

***Habib v. Lynch*, No. 14-3370 (May 29, 2015) Petition for Review, Order of Bd. of Immigration Appeals Petition granted**

Bd. erred in denying alien's motion to reopen his removal proceedings based on claim that his lawyer was ineffective when conceding that alien was not validly married to U.S. citizen at time he had applied to become permanent resident based on alien's marriage to U.S. citizen. Basis for removal was finding that alien had previously obtained immigration benefits through fraud or misrepresentation due to alien's failure to disclose existence of prior marriage to Pakistani woman that had not been dissolved at time of marriage to U.S. citizen, and lawyer's concession precluded alien from establishing (through recently obtained divorce decree) that prior marriage had been dissolved before his marriage to U.S. citizen. Thus, alien was entitled to remand to establish both that his marriage to U.S. citizen was valid, and that his admitted failure to disclose prior marriage on application for permanent resident status was immaterial.

Aliens

***Palma-Martinez v. Lynch*, No. 14-1866 (May 11, 2015) Petition for Review, Order of Bd. of Immigration Appeals Petition denied**

Record contained sufficient evidence to support IJ's order removing alien (native of

Guatemala) on grounds that alien was removable under section 237(a)(2)(A)(i) of INA for having committed crime of moral turpitude arising out of his conviction for conspiracy to transfer false identification document. While alien argued that he was eligible for stand-alone waiver of inadmissibility under section 212(h) of INA, alien was not eligible for said waiver since: (1) section 212(h) limits said waiver to aliens who seek visa, admissions or adjustment of status; and (2) alien was merely attempting to use waiver to avoid his removal.

OSHA

***DuKane Precast, Inc. v. Perez*, No. 14-3156 (May 4, 2015) Petition for Review, Order of OSHA Petition denied**

Record contained sufficient evidence to support ALJ's determination that petitioner-employer committed four violations of OSHA rules arising out of workplace accident in which employee was trapped in 18-foot bin containing sand and incurred serious injuries when co-workers could not timely extract him from said bin. One "willful" violation concerned employer's delay in calling 911 and its failure to prevent co-workers from attempting dangerous rescue of employee. In this regard, supervisor acted recklessly and therefore willfully in failing to recognize either danger of trapped employee or applicability of specified safety procedures/plan associated with said bin.

Railroad Retirement Act

***Duncan v. U.S. Railroad Retirement Bd.*, No. 14-2222 (May 20, 2015) Petition for Review, Order of Railroad Retirement Bd. Affirmed**

Record contained sufficient evidence to support Bd's denial of plaintiff's application for disability annuity under Railroad Retirement Act that was based on 2003 workplace injury, even though plaintiff claimed that pain in his back prevented him from working. While plaintiff's treating physicians gave opinions indicating that plaintiff could not perform even sedentary work, Bd. could properly discount said opinions, where vocational consultant testified that plaintiff could perform variety of light or sedentary skilled jobs, and where objective medical evidence indicated that plaintiff's pain improved with medicine, and that plaintiff had normal gait, muscle strength and sensation. Bd. could also discount plaintiff's complaints of disabling pain, where plaintiff gave inconsistent statements regarding improvement he experienced with medicine, and where recent MRIs of plaintiff indicated no abnormalities. ■

Legislation of interest as posted on E-Clips

Open Meetings Act

House Bill 175

(McSweeney, R-Cary; Duffy, R-Barrington) creates what is essentially a statute of repose for requests for review to be filed with the Public Access Counselor. If the facts concern-

ing the violation are not discovered within 60 days of the violation but discovered at a later date by a person using reasonable diligence, the request must be made within two years after the alleged violation. Passed both chambers.

Open Meetings Act

House Bill 1498

(Thomas Bennett, R-Watseka; Koehler, D-Peoria) provides that a public body may hold closed meetings to consider school building safety and security. Passed both chambers. ■

Save the Date!

Anatomy of a Building Code Violation Administrative Hearing: From Inspection to Judgment

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Wednesday, 7/1/15- Teleseminar—Outsourcing Agreements. Presented by the ISBA. 12-1.

Thursday, 7/2/15- Teleseminar—Planning with Life Insurance Trusts. Presented by the ISBA. 12-1.

Tuesday, 7/7/15- Teleseminar—Business Planning with Series LLCs. Presented by the ISBA. 12-1.

Tuesday, 7/7/15- Webinar—Introduction to Legal Research on Fastcase. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 3-4 pm.

Wednesday, 7/8/15- Teleseminar—Ethical Issues When Representing the Elderly—LIVE REPLAY. Presented by the ISBA. 12-1.

Thursday, 7/9/15- Teleseminar—Settlement Agreements in Litigation- LIVE REPLAY. Presented by the ISBA. 12-1.

Thursday, 7/9/15- Webinar—Advanced Tips for Enhanced Legal Research on Fastcase. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 3-4 pm.

Tuesday, 7/14/15- Teleseminar—Tax Planning for Real Estate, Part 1. Presented by the ISBA. 12-1.

Tuesday, 7/14/15- Webinar—Fastcase Boolean (Keyword) Search for Lawyers. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 3-4 pm.

Wednesday, 7/15/15- Teleseminar—Tax Planning for Real Estate, Part 2. Presented by the ISBA. 12-1.

Tuesday, 7/21/15- Teleseminar—Restrictive & Protective Covenants in Real Estate. Presented by the ISBA. 12-1.

Wednesday, 7/22/15- Teleseminar—Fiduciary Duties & Liability of Nonprofit/Exempt Organization Directors and Officers.

Presented by the ISBA. 12-1.

Thursday, 7/23/15- Teleseminar—Ethics and Digital Communications- LIVE REPLAY. Presented by the ISBA. 12-1.

Friday, 7/24/15- Teleseminar—Estate Planning for Farms and Ranches- LIVE REPLAY. Presented by the ISBA. 12-1.

Tuesday, 7/28/15- Teleseminar—Business Planning with S Corps, Part 1. Presented by the ISBA. 12-1.

Wednesday, 7/29/15- Teleseminar—Business Planning with S Corps, Part 2. Presented by the ISBA. 12-1.

Thursday, 7/30/15- Teleseminar—Eminent Domain, Part 1- LIVE REPLAY. Presented by the ISBA. 12-1.

Friday, 7/31/15- Teleseminar—Eminent Domain, Part 2- LIVE REPLAY. Presented by the ISBA. 12-1.

August

Tuesday, 8/4/15- Teleseminar—Construction Agreements, Part 1. Presented by the ISBA. 12-1.

Tuesday, 8/4/15- Webinar—Introduction to Legal Research on Fastcase. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 11-12.

Wednesday, 8/5/15- Teleseminar—Construction Agreements, Part 2. Presented by the ISBA. 12-1.

Thursday, 8/6/15- Webinar—Advanced Tips for Enhanced Legal Research on Fastcase. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 11-12 pm.

Tuesday, 8/11/15- Teleseminar—Estate Planning with Annuities & Financial Products. Presented by the ISBA. 12-1.

Tuesday, 8/11/15- Webinar—Fastcase Boolean (Keyword) Search for Lawyers. Presented by the Illinois State Bar Association

– Complimentary to ISBA Members Only. 11-12 pm.

Thursday, 8/13/15- Teleseminar—2015 in Age Discrimination Update. Presented by the ISBA. 12-1.

Friday, 8/14/15- Teleseminar—Ethical Issues in Buying, Selling, or Transferring a Law Practice. Presented by the ISBA. 12-1.

Tuesday, 8/18/15- Teleseminar—Business Divorce: When Business Partners Part Ways, Part 1. Presented by the ISBA. 12-1.

Wednesday, 8/19/15- Teleseminar—Business Divorce: When Business Partners Part Ways, Part 2. Presented by the ISBA. 12-1.

Thursday, 8/20/15- Teleseminar—Easements in Real Estate. Presented by the ISBA. 12-1.

Monday, 8/24/15- Teleseminar—Like-Kind Exchanges of Business Interests- LIVE REPLAY. Presented by the ISBA. 12-1.

Tuesday, 8/25/15- Teleseminar—Estate Planning for Guardianship and Conservatorships. Presented by the ISBA. 12-1.

September

Tuesday, 9/1/15- Teleseminar—Estate & Trust Planning With the New 3.8% on Income. Presented by the ISBA. 12-1.

Wednesday, 9/2/15- Teleseminar—Drafting Service Agreements in Business. Presented by the ISBA. 12-1.

Thursday, 9/3/2015- CRO and LIVE WEBCAST—The Basics of LLC Operating Agreements. Presented by the ISBA Business and Securities Section. 1:00-4:45 pm.

Thursday, 9/3/15- Teleseminar—Drafting Effective Employee Handbooks- LIVE REPLAY. Presented by the ISBA. 12-1.

Friday, 9/4/15- Teleseminar—Rights of First Refusal/Rights of First Offer in Transactions. Presented by the ISBA. 12-1. ■

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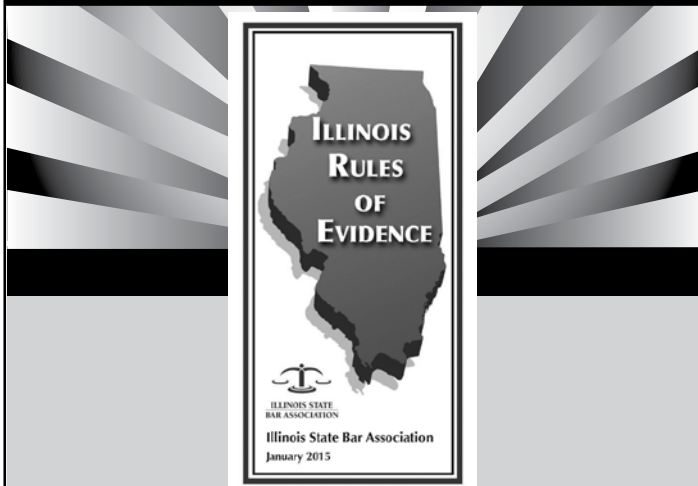
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