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IN THE SUPREME COURT
OF THE STATE OF ILLINOIS

PIASA ARMORY, LLC, Plaintiff-Appellee, v. KWAME RAOUL, in his official capacity as Attorney General of the State of Illinois, Defendant-Appellant,	) Appeal from the Circuit Court of the) Third Judicial Circuit, Madison County,) Illinois.)) No. 2023-LA-1129))) The Honorable) RONALD J. FOSTER, JR.,) Judge Presiding)

BRIEF OF PLAINTIFF-APPELLEE PIASA ARMORY, LLC

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Thomas G. Maag
Peter J. Maag
Maag Law Firm, LLC
22 West Lorena Avenue
Wood River, IL 62095
618-216-5291
tmaag@maaglaw.com
maaglawoffice@gmail.com

Attorneys for Appellee Piasa Armory LLC

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FACTS

Plaintiff Piasa Armory, LLC, is an Illinois Limited Liability Company, with its only place of business in Madison County, Illinois. Piasa is a federally and state licensed firearms manufacturer and retailer. All but one of its employees are residents of Madison County.

The bulk of the complaint in this case alleges constitutional challenges to the so called Firearms Industry Responsibility Act, Pub. Act No. 103-559 (eff. Aug. 14, 2023). Under the traditional Illinois general venue statute, there would be no issue with filing this action in Plaintiff's home county, Madison, the sole location that Illinois is violating Plaintiff's rights.

The general venue statute, which is not challenged here, provides that venue is proper, in a civil case, in the defendant's county of residence or in the county in which "the transaction or some part thereof occurred out of which the cause of action arose." 735 ILCS 5/2-101 (2022). Other statutes exist setting forth appropriate venues in certain circumstances. All of these have one thing in common, they set venue in counties in which the parties, the subject of the litigation or the witnesses exist.

In 2023, the General Assembly amended the Code of Civil Procedure to restrict venue for constitutional challenges to state statutes, regulations, and executive orders in Sangamon and/or Cook County. See Pub. Act No. 103-5, § 2 (eff. June 6, 2023) (to be codified at 735 ILCS 5/2-101.5).

The rationale of that decision is somewhat unclear, with different persons offering differing explanations.

The General Assembly thus determined that these cases should be brought in the first instance in Sangamon or Cook County, no matter the facts or evidence, or its location.

Plaintiff challenged the amended venue statute, section 2-101.5, on the ground that it violates its "federal due process rights," as well as the rights of all those who reside in or were injured in counties other than Sangamon and Cook. C13-17. This is an *as applied* challenge.

Plaintiff contended that section 2-101.5 was invalid on due-process grounds because it "deprive[s] . . . litigant[s] of the opportunity to use the courts," thus making their legal rights "worthless." C15.

The Attorney General moved to transfer venue to Sangamon County pursuant to section 2-101.5. C73. In response, plaintiff opposed transfer and submitted two declarations (one from plaintiff's owner and one from its

counsel). C168. No contradictory affidavits or filings were made by Defendant.

The circuit court denied the Attorney General's motion to transfer venue and granted plaintiff's motion for partial summary judgment. A1. The court held that section 2-101.5 violated the federal due-process rights of Plaintiff also argued, as a defense to transfer, that the amended venue statute could not be enforced because it violated article IV, section 8, of the Illinois Constitution, in that it was not "read by title on three different days in each house." C138. But plaintiff did not allege a claim in its complaint that the amended venue statute was unconstitutional on this ground and did not seek summary judgment on that theory, and the circuit court specifically disclaimed it in its opinion.

In doing so, the court relied on this Court's opinion in *Williams v. Illinois State Scholarship Comm'n*, 139 Ill. 2d 24 (1990), which held that venue statutes are generally constitutional, but recognized an exception for statutes "so arbitrary and unreasonable," id. at 42, as to deprive a litigant of access to the courts. A5. The circuit court also held that plaintiff had shown that section 2-101.5violated its own due-process rights, in that plaintiff had "presented evidence" showing that litigating its challenge to the Act in Sangamon County would be "inconvenien[t]," whereas the Attorney General

had not shown that it would suffer any inconvenience from presenting his defense in Madison County. A5-6. In the end, the court declared the new venue statute unconstitutional, as applied.

ARGUMENT

Never before in history has the Illinois General Assembly sought to limit where the most important cases that could be filed, are in fact able to be filed, in such a limited fashion. After literal centuries of allowing constitutional cases to be filed in a broad array of fora, depending on the facts and the parties of the cases, the Illinois General Assembly took the broad and unprecedented step of requiring all constitutional based lawsuits involving the State of Illinois, to be filed, not necessarily where the Defendant resides, or where the allegedly offending conduct is taking place, or where the Attorney General might enforce the offending statute, but rather, in just one of two counties in the state, whether or not those two counties have any articulatable connection to the controversies, or not. See Pub. Act No. 103-5, § 2 (eff. June 6, 2023) (to be codified at 735 ILCS 5/2-101.5).

Plaintiff Piasa Armory, LLC, does not dispute that this case is subject to *de novo* review, as the sole issue is the grant of summary judgment on a legal issue. *Pielet v. Pielet*, 2012 IL 112064, Para. 30. Piasa also does not

dispute that statutes are generally reviewed with presumption of constitutionality. However, the fact that there may well be a presumption of constitutionality, does not mean, in fact, the statute is constitutional. If a statute is unconstitutional, it is the unceasing and unambiguous duty of this Court, in fact, all courts, to strike said purported statute, and declare it unconstitutional. *People v. Gersch*, 135 Ill.2d 384, 402 (IL1990)("where a statute is violative of constitutional guarantees, we have a duty not only to declare such a legislative act void, but also to correct the wrongs wrought through such an act by holding our decision retroactive.").

In this case, the statute is unconstitutional, at least as it is being applied to Plaintiff.

In presenting this argument, it is important to note what is, and what is not presently before this Court. This is not a case appealing the denial of a venue transfer order, as no Petition for Leave to Appeal under Rule 306 was filed for that order, there is no briefing of that issue in Defendant's brief, and the three readings and other grounds that the statute may be unconstitutional are also not before it. Only due process.

Whether or not *forum non conveniens*, as a concept of state law, is a good or a bad thing, is not before the Court. While one could, perhaps, find no greater critic of *intrastate forum non conveniens* as it presently exists,

than the author of this brief, and perhaps a candid discussion over the application of the doctrine of *forum non conveneins* in Illinois, and just when it should be applicable should take place. Certainly, the undersigned would be willing to participate in any possible commissions to study changes. But this case is not the time and place for it. Neither is or was the general assembly, as *forum non conveniens* was adopted by this Court, not the General Assembly. Arguably the legislature has no power to abolish *forum non conveniens*, it being judicially recognized.

This Court once cited, in *First Nat. Bank v. Guerine,* 261 Ill.Dec. 763, 768 (IL 2002), to a then recent review of intrastate *forum non conveniens*, wherein this Court state "a commentator aptly noted:

> 'The truth of the matter is that both plaintiffs' counsel and defendants' counsel are jockeying for position by seeking a judge, jury and forum that will enable them to achieve the best possible result for their clients. There is no doubt that in the personal injury context, the plaintiff is seeking a forum where he can recover the most money and the defendant is seeking a forum where it will have to pay the least. All other considerations are secondary to both sides.'"

G. Maag, *Forum Non Conveniens* in Illinois: A Historical Review, Critical Analysis, and Proposal for Change, 25 So. Ill. L.J. 461, 510 (2001).

Nothing has changed in the intervening thirteen years since that article was written. In this case, despite all of the high sounding arguments to the contrary, the simple fact is that the General Assembly, in passing this venue statute, applicable only to cases against the state, and its proxies, were "jockeying for position by seeking a judge, jury and forum that will enable them to achieve the best possible result", not for their clients, but for *themselves*. It is also fair to say, that in contesting this new venue statute, Plaintiff believes he will obtain a better result, at a lower cost, than in the two special fora chosen by the legislature to hear claims against the actions of the state.

But this case is not a *forum non conveniens* case, rather it is a venue case, reliant on this Court's decision in *Williams v. STATE SCHOLARSHIP COM'N*, 150 Ill.Dec. 578 (IL 1990), which in turn relied on *Mathews v. Eldridge* (1976), 424 U.S. 319, 334-35, 47 L.Ed.2d 18, 33, 96 S.Ct. 893, 903,

In *Williams,* the same as now, the general venue statute in Illinois, long in effect and not contested herein, states:

> "Except as otherwise provided in this Act, every action must be commenced
>
> (1) in the county of residence of any defendant * * * or
>
> (2) in the county in which the transaction or some part thereof occurred out of which the cause of action arose.

(Ill.Rev.Stat.1987, ch. 110, par. 2-101.)

The basic purpose behind this enactment was to provide a forum that was convenient either to the defendant, by commencing the action near his home, or to the witnesses, by making it possible to litigate the case where the transaction occurred. (*Baltimore & Ohio R.R. Co. v. Mosele* (1977), 67 Ill.2d 321, 328, 10 Ill.Dec. 602, 368 N.E.2d 88; Historical & Practice Notes, at 56-57 (Smith-Hurd 1983)(citations omitted). However, statutory venue requirements are procedural only, and have no relation to the power of a court to decide the merits of a case. Venue rules only define the particular court where a case is to be heard. See *Stambaugh v. International Harvester Co*. (1984), 102 Ill.2d 250, 257, 80 Ill.Dec. 28, 464 N.E.2d 1011; *United Biscuit Co. of America v. Voss Truck Lines, Inc*. (1950), 407 Ill. 488, 501, 95 N.E.2d 439.

As noted in *Williams*, because venue is merely a matter of procedure, courts generally cannot interfere with the legislature's province in determining where venue is proper (*Chappelle v. Sorenson* (1957), 11 Ill.2d 472, 476, 143 N.E.2d 18), unless constitutional provisions are violated. (*Power Manufacturing Co. v. Saunders* (1926), 274 U.S. 490, 495, 47 S.Ct. 678, 680, 71 L.Ed. 1165, 1168.

In fact, prior to *Williams*, this Court had never declared a venue statute unconstitutional. *Williams*, 150 Ill.Dec. 586.

Like in *Williams*, the trial court in this case relied on, aside from *Williams* itself, the balancing test set forth in *Mathews v. Eldridge* (1976), 424 U.S. 319, 334-35, 96 S.Ct. 893, 903, 47 L.Ed.2d 18, 33, for determining whether a statute or governmental policy violates due process.

In this case, the legislature adopted a new, specific venue statute, that applied *only* to constitutional cases brought against the state and its proxies. See 735 ILCS 5/2-101.5.

Per the plain language of the new venue statute;

> (a) Notwithstanding any other provisions of this Code, if an action is brought against the State or any of its officers, employees, or agents acting in an official capacity … seeking declaratory or injunctive relief against any State statute, rule, or

executive order based on an alleged violation of the Constitution of the State of Illinois or the Constitution of the United States, venue in that action is proper only in the County of Sangamon and the County of Cook.

(b) The doctrine of *forum non conveniens* does not apply to actions subject to this Section.

735 ILCS 5/2-101.5

The General Assembly, for its purposes, as explained by Representative Hoffman, seemed to think that a Plaintiff had no rights to a reasonably convenient venue. Illinois House of Representatives, 103rd Session, 53rd Leg. Day, p. 63, (SR128). Likewise, it appears that the Illinois General Assembly, considered *no county*, in Illinois, no matter the facts, inconvenient for trial. Id. The challenged venue statute was written with these ideas in mind.

Upon motion and argument, the trial court found the statute unconstitutional as violative of due process. While this statute was literally passed, on a last minute basis, in violation of the three readings rule of the Illinois Constitution, the trial court, based on this Court's precedent, did not strike the statute on that basis. and was and is a blatant attempt at gross venue shopping by the General Assembly. It was also based, at least in part,

on the opinion of some, maybe even a majority, of the general assembly, that "the idea that any county in Illinois was inconvenient for purposes of holding a trial was nonsense."

The Defendant used the occasion to suggest that the trial court abolish *forum non conveniens*, which, of course as it was adopted by this Court, not the trial court, only this Court could abolish same. Much of the argument of Defendant centers around advocating for the abolishment of *forum non conveniens*. Finally, the trial court found it could not overrule this Court as to the three readings rules jurisprudence, which of course is accurate, on this Court can overrule itself on a matter of Illinois law.

Facial Versus As Applied.

In this case, the trial court held the challenged statute unconstitutional, *as applied*. (SR224). The trial court's order makes this clear *repeatedly*, that being at least three times in its order, that its finding is *as applied*. (SR224-SR225).

Defendant, for its purposes, argues, "Because section 2-101.5 is constitutional in at least that large category of cases, the circuit court erred in finding it facially invalid." (Def. Brief, p. 13). Defendant does not appear to actually challenge the finding of *as applied* unconstitutionality, and appears to try to suggest that despite the trial court treating this *as applied* challenge,

that this is really a facial challenge. The simple fact is that the Defendant cannot transform an *as applied* challenge into a facial one, simply because it is better for his argument. As to Cook and Sangamon County residents, Plaintiff concedes this statute is constitutional, at least under due process.

As Defendant's arguments are all directed to an alleged facial finding of unconstitutionality not actually made by the trial court, this Court should dismiss this appeal and/or summarily affirm as Defendant has not addressed the fundamental issue on appeal, whether the statute is unconstitutional as applied.

As the trial court focused its decision on the three *Mathews*, discussed in *Mathews v. Eldridge* (1976), 424 U.S. 319, 334-35, Plaintiff will start there as well.

The Three Mathews Factors

To determine the process due for claims based on established procedures, the Court must balance "the private interest ... affected by the official action[,] the risk of an erroneous deprivation of such interest[,] and ... the Government's interest." *Mathews v. Eldridge*, 424 U.S. 319, 335, 96 S.Ct. 893, 47 L.Ed.2d 18 (1976). These are the same factors applied by this Court in *Williams v. STATE SCHOLARSHIP COM'N*, 150 Ill.Dec. 578 (IL 1990), when it struck the venue provision in that case.

First Matthew Factor

Defendant starts its argument by claiming, without citation, "a litigant's right of "access to the courts" — the private interest at stake under the circuit court's analysis, A9 — does not encompass the right to file a lawsuit in a county of its choosing." (Def. Brief, p. 14).

Plaintiff actually agrees with this sentiment, to a point. In fact, it is fair to say that, at least in a civil case, neither a Plaintiff, nor a Defendant, have an *unfettered* constitutional right to have a given lawsuit filed, or be able to be filed, in a particular county. The venue rights of both a Plaintiff and a Defendant, are, to a certain effect, measured against each other, to provide each side with a reasonable degree of convenience, depending on the facts of the case. While a governmental entity, presumably, if free to waive whatever due process right it might otherwise have for itself, a non-governmental Plaintiff and a non-governmental Defendant each have due process rights to protect.

In this case, a Madison County Plaintiff, who does no business outside of Madison County, and whose employees and witnesses are almost, to a person, Madison County residents, under the challenged statute, are given

the choice, in an effort to vindicate their First Amendment rights, of litigating, not where they are damaged, not where the statute is enforced against them and not in the closest courthouse, but rather, in one of two arbitrarily selected fora, ranging from a 90 minute to a multi-hour drive away.

In *Williams*, as noted by the trial court, this Court noted that "standing alone, requiring venue to be in a particular county does not necessarily infringe upon [the] right of access to the courts." *Williams, at* 63. Said another way, arbitrary selection of a particular county may well, by itself, infringe on the right of access to the courts.

In *Williams,* this court was concerned about defaults. In this case, while a default is not a likely outcome, difficultly, which may well rise to inability to present the case, does arise. As noted by the trial court, it is difficult to see how a given Plaitniff could present its case without witnesses or documents. (SR233).

In this case, Plaitniff has submitted evidence, in the form of maps, showing Sangamon and Cook Counties, being much further away than Madison County. Plaintiff submitted an affidavit from Scott Pulaski, owner of Piasa, setting forth that Madison County is convenient for him and Sangamon County is not. Clearly, if Sangamon county was inconvenient,

Cook County would be downright impossible. Likwise, Plaitniff's counsel is in Madison County, and while not entitled to much consideration, it is entitled to some.

Defendant, for its purposes, cites to not a single witness, document or other connection in or with Sangamon or Cook County.

Boddie v. Connecticut (1971), 401 U.S. 371, 377, 91 S.Ct. 780, 785, 28 L.Ed.2d 113, 118, which states that "due process requires, at a minimum, that absent a countervailing state interest of overriding significance, persons forced to settle their claims of right and duty through the judicial process must be given a meaningful opportunity to be heard." As stated by this Court in Williams, "Depriving a litigant of the opportunity to use the courts effectively makes [the right of legal access to the courts] worthless." *Williams*, 150 Ill.Dec. 587. In this case, the challenged statute deals with where and how to resolve a dispute with the state over a constitutional violation. There is no informal mediation process to resolve such things. The state, with its immense police forces and funding, will act how it wishes to act, but for the right to access to the courts.

As noted by this Court in *Williams*, this includes the arbitrariness of the forum mandated. *Williams*, 150 Ill.Dec. 588. Again, Defendants suggest no alternative means of dispute resolution, outside of the courts. Persons in

Illinois have only one means to stop unconstitutional acts by its government, the Courts. Thus, to protect themselves, they must have meaningful access to the Courts.

Defendant, on the other hand, argues that Plaintiff "does not allege that complying with the amended venue statute would completely preclude him or her from filing suit at all." (Def. Brief.,).. But that is not the standard this Court set forth in *Williams*. ("In Williams, the Illinois Supreme Court held that forum-selection clauses in guaranteed student loan agreements were invalid because they violated the students' due process right of meaningful access to the courts".

There is a fundamental difference is saying that one can physically walk into a courthouse, or physically file a given document or physically appear for a hearing, and saying that this same system in said Courthouse will be able to be used effectively to vindicate rights. It is not merely a trial that must be held in these counties, it is the preparation of an entire case for trial, and actually presenting it.

The first *Matthews* factor is satisfied.

Second Matthew Factor

The second element is the risk of the erroneous deprivation of the right. In *Williams,* this concern was manifested in the potential for defaults

as against potentially meritorious defenses. While, in total candor, it is probably not likely that a filing Plaintiff will suffer a *default* judgment, that being a money judgment being entered against the Plaintiff, the truth of the matter is, that the farther away from the location of the unconstitutional conduct, and the farther away from the potential witnesses a given case is forced to be litigated, the harder it is for the person bringing the case, to, in actuality, bring all aspects of the case. While the General Assembly, or some portion of it, may consider the idea that a given county is inconvenient for trial, being "nonsense" the reality if far different for those that have to comply. Broad, expansive highways may well connect Cairo to Chicago or East Alton to Springfield, but that does not made the trip "convenient". In fact, the opposite is true. In terms of length, Illinois is about 390 miles long and 210 miles wide. See https://en.wikipedia.org/wiki/Illinois To say that there is no location in Illinois that it is inconvenient for trial for persons from some other portion of the state is, simply not based in reality.

Witnesses sometimes cannot travel to their local courthouse to testify. Unwilling witnesses may well be even more difficult. While depositions can be used, live testimony is preferred. The bottom line is this, it is always easier to try local matters, with local evidence, locally. How much easier, and how much of a practical problem is imposed on requiring cases and

trials to take place in foreign counties will depend greatly on the distance and the case. This Court can take judicial notice that Constitutional cases are some of the most complicated cases to prosecute and try. Several of the Amicus, as to the State, comment on the relative ease or difficulty of presenting evidence, online, out of county, and the like. The bottom line, it is not generally the rich and powerful that bring constitutional cases; it is the weak, the downtrodden, the poor, ones who the entire system has seemingly turned against them. Perhaps accusing them of crimes they did not commit, perhaps demanding access to files and premises they are not entitled to see. And yet, they persevere. These downtrodden should not have the added roadblocks of traveling to strange places, having to potentially invest in new technologies that the state provides its own routinely, or the like. To quote a classic musical opera, it is one more brick in the wall. Certainly, reasons can be found, they can always be found, to justify making vindicating of basic rights harder for the downtrodden, and litigation of them easier for the Attorney General. One more tool in the toolbox, it is often said. \

No more. If one would not make a run of the mill personal injury Plaintiff have to file in a strange county, its probably a due process violation to force a constitutional claim to be filed there.

Third Matthew Factor

The Government's interest is the third *Williams* factor. Just what is the government's interest in funneling an entire state worth of litigation into two counties? Based on the record and argument in this case, the world may never know; as the Defendant does not come out and directly tell us. In fact, the only place where "government's interest" appears in the state's brief, is in the appendix, wherein it attaches a copy of the order it appealed from. (See Appendix, p. 8). However, as the State does dance around the issue, Plaintiff will attempt to respond to what they list.

Defendant argues "[m]ost basically, it disregards the deference courts owe to the General Assembly's choice of venue." (Def. Brief. P. 31). But Courts owe no deference to an unconstitutional act, as it is void.

Defendant also argues that The General Assembly has enacted a wide range of venue statutes prescribing where plaintiffs may bring suit, supra pp. 5-6, and, as the Court explained in Williams, courts "generally cannot interfere" with those legislative determinations, 139 Ill. 2d at 41. While true, Defendant left off the last part of the sentence; "unless constitutional provisions are violated." Here, it is alleged constitutional provisions were violated.

Third, and finally, Defendant argues that "the General Assembly reasonably concluded that the public interest would be best served by setting venue for constitutional claims in Sangamon or Cook County." But this is contrary to what this Court found in *Williams*, which found this argument, "not strong." P. 61 Williams

As also found in *Williams*, this Court found "there is nothing in the record to indicate that filing these []suits in other counties of the State will take any more time or be any more difficult than filing suit in Cook County." *Williams p. 61*. Also, like in *Williams*, Defendant fails to articulate any evidence showing more efficient adjudication by limiting files to just two counties, or any of the other facts considered important by this Court in *Williams*. The bottom line argument of the State is that the General Assembly has the raw power to do this, so this Court must accept this, *Matthews* factors of *Williams* notwithstanding.

CONCLUSION

For the above reasons, this Court should affirm the trial court.

Respectfully Submitted,

By: s/Thomas G. Maag
Thomas G. Maag
Peter J. Maag
Maag Law Firm. LLC
22 West Lorena Avenue
Wood River, IL 62095
618-216-5291 (phone)
tmaag@maaglaw.com
maaglawoffice@gmail.com

Attorneys for Plaintiff-Appellant

CERTIFICATE OF COMPLIANCE

I certify that this brief conforms to the requirements of Rules 341(a) and (b). The length of this brief, excluding the pages or words contained in the Rule 341(d) cover, the Rule 341(h)(1) table of contents and statement of points and authorities, the Rule 341(c) certificate of compliance, the certificate of service, and those matters to be appended to the brief under Rule 342(a), is 27 pages.

sThomas G. Maag
Thomas G. Maag
Maag Law Firm. LLC
22 West Lorena Avenue
Wood River, IL 62095
618-216-5291 (phone)
tmaag@maaglaw.com
maaglawoffice@gmail.com

CERTIFICATE OF FILING AND SERVICE

I certify that on October 7, 2024, I electronically filed the foregoing Brief of Plaintiff-Appellee, with the Clerk of the Illinois Supreme Court, by using the Odyssey eFileIL system.

I further certify that the other participants in this appeal, named below, is a registered service contact on the Odyssey eFileIL system, and thus will be served via the Odyssey eFileIL system.

Irina Y. Dmitrieva - 6281305
HeplerBroom, LLC
70 West Madison Street, Suite 2600
Chicago, Illinois 60602
312-205-7720
Irina.Dmitrieva@heplerbroom.com
Edward K. Grasse - 6244518

Grasse Legal, LLC
1900 East Golf Road, Suite 950
Schaumburg, Illinois 60173
312-348-5127
edgrasse@grasselegal.com

Donald Patrick Eckler - 6262801
FREEMAN MATHIS & GARY, LLP
33 North Dearborn St, Suite 1430
Chicago, Illinois 60602
(773) 389-6446
Patrick.Eckler@fmglaw.com

ALEX HEMMER
Deputy Solicitor General
115 South LaSalle Street
Chicago, Illinois 60603
(312) 814-5526 (office)
(773) 590-7932 (cell)
CivilAppeals@ilag.gov (primary)
Alex.Hemmer@ilag.gov (secondary)

JANE ELINOR NOTZ
Solicitor General
115 South LaSalle Street
Chicago, Illinois 60603
(312) 814-3312

Kelly T. Crosby
Thomas Q. Keefe, Jr.
KEEFE, KEEFE & UNSELL, P.C.
6 Executive Woods Court
Belleville, IL 62226
(618) 236-2221

sThomas G. Maag
Thomas G. Maag
Maag Law Firm. LLC
22 West Lorena Avenue
Wood River, IL 62095
618-216-5291 (phone)
tmaag@maaglaw.com
maaglawoffice@gmai.com

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