

IN  
NO. 127824

THE  
SUPREME COURT OF ILLINOIS

---

THE PEOPLE OF THE  
STATE OF ILLINOIS,

Appellee

) From the Appellate Court of )  
Illinois, Second Judicial  
) District,  
No. 2-19-1059

LAURA EPSTEIN  
Appellant

) Appeal from the Circuit Court  
) for the 17<sup>th</sup> Judicial Circuit,  
) Boone County, Illinois  
Case No. 18-CF-89  
Honorable  
JOHN YOUNG,  
Trial Judge Presiding

---

TABLE OF CONTENTS TO THE RECORD ON APPEAL

Christopher J. Taylor

TAYLOR LAW , Attorneys at Law (6207852)  
P.O. Box 72 Oswego,  
IL 60543  
(888) 369-3466  
Taylorlawpc@att.net

E-FILED  
2/8/2022 10:04 AM  
CYNTHIA A. GRANT  
SUPREME COURT CLERK

NO. 127824

IN THE

## SUPREME COURT OF ILLINOIS

THE PEOPLE OF THE STATE OF ILLINOIS,	)	
	)	From the Appellate Court of
	)	Illinois, Second Judicial
Respondent-Appellant	)	District,
	)	No. 2-19-1059
	)	
LAURA EPSTEIN	)	Appeal from the Circuit Court
Petitioner-Appellee,	)	for the 17 <sup>th</sup> Judicial Circuit,
	)	Boone County, Illinois
	)	
	)	Case No. 18-CF-89
		Honorable
		JOHN YOUNG,
		Trial Judge Presiding

## TABLE OF CONTENTS TO THE RECORD ON APPEAL

## COMMON LAW RECORD - TABLE OF CONTENTS

Page 1 of 3

<u>Date Filed</u>	<u>Title/Description</u>	<u>Page No</u>
	Record sheet	C 5 - C 11
03/01/2018	BILL OF INDICTMENT	C 12 - C 15
03/02/2018	MOTION FOR DISCLOSURE TO THE PROSECUTION	C 16 - C 17
03/02/2018	MOTION FOR PROTECTIVE ORDER	C 18 - C 18
03/02/2018	ORDER-PROTECTIVE	C 19 - C 19
03/02/2018	HEARING NOTICE	C 20 - C 20
03/09/2018	FORMAL DISCOVERY DISCLOSURE TO DEFENDANT PURSUANT TO RU	C 21 - C 23
03/09/2018	PROOF OF SERVICE	C 24 - C 24
03/16/2018	SUPPLEMENTAL ANSWER TO DISCOVERY	C 25 - C 25
03/16/2018	PROOF OF SERVICE	C 26 - C 26
04/13/2018	HEARING NOTICE	C 27 - C 27
05/25/2018	HEARING NOTICE	C 28 - C 28
07/20/2018	HEARING NOTICE	C 29 - C 29
08/03/2018	HEARING NOTICE	C 30 - C 30
08/24/2018	HEARING NOTICE	C 31 - C 31
09/07/2018	HEARING NOTICE	C 32 - C 32
09/28/2018	HEARING NOTICE	C 33 - C 33
09/28/2018	ORDER	C 34 - C 34
10/09/2018	SUBPOENA DUCES TECUM ISSUED	C 35 - C 35
10/19/2018	HEARING NOTICE	C 36 - C 36
11/30/2018	HEARING NOTICE	C 37 - C 37
01/11/2019	HEARING NOTICE	C 38 - C 38
02/15/2019	MOTION TO EXCLUDE EVIDENCE	C 39 - C 43
02/15/2019	PHARMACONSULTANT INC REPORT	C 44 - C 44
02/15/2019	JAMES THOMAS O'DONNELL CV'S	C 45 - C 45

NO. 127824

IN THE

## SUPREME COURT OF ILLINOIS

THE PEOPLE OF THE	)	
STATE OF ILLINOIS,	)	From the Appellate Court of
	)	Illinois, Second Judicial
Respondent-Appellant	)	District,
	)	No. 2-19-1059
	)	
LAURA EPSTEIN	)	Appeal from the Circuit Court
Petitioner-Appellee,	)	for the 17 <sup>th</sup> Judicial Circuit,
	)	Boone County, Illinois
	)	
	)	Case No. 18-CF-89
		Honorable
		JOHN YOUNG,
		Trial Judge Presiding

## TABLE OF CONTENTS TO THE RECORD ON APPEAL

## COMMON LAW RECORD - TABLE OF CONTENTS

Page 2 of 3

<u>Date Filed</u>	<u>Title/Description</u>	<u>Page No</u>
02/15/2019	HEARING NOTICE	C 46 - C 46
05/21/2019	STATE'S ANSWER TO DEFENDANT'S MOTION TO EXCLUDE EVIDENC	C 47 - C 49
05/21/2019	NOTICE	C 50 - C 50
05/21/2019	MOTION TO CONTINUE	C 51 - C 51
05/21/2019	SUBPOENA DUCES TECUM ISSUED TO MAUH-NAH-TEE-SEE COUNTRY	C 52 - C 52
05/21/2019	SUPPLEMENTAL ANSWER TO DISCOVERY	C 53 - C 53
05/21/2019	PROOF OF SERVICE	C 54 - C 54
05/23/2019	FIRST MOTION IN LIMINE	C 55 - C 55
05/23/2019	NOTICE OF FILING	C 56 - C 56
06/04/2019	SUBPOENA DUCES TECUM SERVED ON MAUH-NAH-TEE-SEE COUNTRY	C 57 - C 57
06/07/2019	HEARING NOTICE	C 58 - C 58
06/13/2019	PROOF OF SERVICE	C 59 - C 59
06/13/2019	SUPPLEMENTAL ANSWER TO DISCOVERY	C 60 - C 60
06/26/2019	PEOPLE'S SUBPOENA E-MAILED TO DEPUTY RHONDA MOORE	C 61 - C 62
07/12/2019	HEARING NOTICE	C 63 - C 63
07/19/2019	HEARING NOTICE	C 64 - C 64
08/02/2019	HEARING NOTICE	C 65 - C 65
08/23/2019	HEARING NOTICE	C 66 - C 66
08/23/2019	ORDER	C 67 - C 67
09/13/2019	HEARING NOTICE	C 68 - C 68
09/13/2019	MOTION TO RECONSIDER	C 69 - C 70
09/26/2019	HEARING NOTICE	C 71 - C 71
09/26/2019	NOTICE OF APPEARANCE	C 72 - C 72
10/03/2019	NOTICE RETURNED BY MAIL	C 73 - C 73
10/07/2019	NOTICE	C 74 - C 74

NO. 127824

IN THE

## SUPREME COURT OF ILLINOIS

---

THE PEOPLE OF THE	)	
STATE OF ILLINOIS,	)	From the Appellate Court of
	)	Illinois, Second Judicial
Respondent-Appellant	)	District,
	)	No. 2-19-1059
	)	
	)	Appeal from the Circuit Court
LAURA EPSTEIN	)	for the 17 <sup>th</sup> Judicial Circuit,
Petitioner-Appellee,	)	Boone County, Illinois
	)	
	)	Case No. 18-CF-89
	)	Honorable
	)	JOHN YOUNG,
	)	Trial Judge Presiding

---

## TABLE OF CONTENTS TO THE RECORD ON APPEAL

## COMMON LAW RECORD - TABLE OF CONTENTS

Page 3 of 3

<u>Date Filed</u>	<u>Title/Description</u>	<u>Page No</u>
10/11/2019	HEARING NOTICE	C 75 - C 75
10/11/2019	RESPONSE TO MOTION TO RECONSIDER	C 76 - C 78
10/24/2019	HEARING NOTICE	C 79 - C 79
11/07/2019	HEARING NOTICE	C 80 - C 80
11/07/2019	ORDER	C 81 - C 81
12/03/2019	NOTICE OF FILING	C 82 - C 82
12/03/2019	NOTICE OF APPEAL	C 83 - C 84
12/03/2019	REQUEST FOR PREPARATION OF COMMON LAW RECORD	C 85 - C 85
12/03/2019	REQUEST FOR TRANSCRIPTS	C 86 - C 86
12/03/2019	CERTIFICATION OF QUESTION FOR APPEAL	C 87 - C 87
12/03/2019	CERTIFICATE OF IMPAIRMENT	C 88 - C 89
12/03/2019	ORDER	C 90 - C 92
12/04/2019	FILING SUBMITTED - NOTICE OF APPEAL	C 93 - C 94
12/04/2019	HEARING NOTICE	C 95 - C 95
12/05/2019	FILING ACCEPTED - NOTICE OF APPEAL	C 96 - C 97
12/23/2019	APPELLATE COURT DOCKETING STATEMENT-12/23/2019	C 98 - C 98



NO. 127824

IN THE

## SUPREME COURT OF ILLINOIS

---

THE PEOPLE OF THE	)	
STATE OF ILLINOIS,	)	From the Appellate Court of
	)	Illinois, Second Judicial
Respondent-Appellant	)	District,
	)	No. 2-19-1059
	)	
	)	Appeal from the Circuit Court
LAURA EPSTEIN	)	for the 17 <sup>th</sup> Judicial Circuit,
Petitioner-Appellee,	)	Boone County, Illinois
	)	
	)	Case No. 18-CF-89
	)	Honorable
	)	JOHN YOUNG,
	)	Trial Judge Presiding

---

## TABLE OF CONTENTS TO THE RECORD ON APPEAL

## REPORT OF PROCEEDINGS - TABLE OF CONTENTS

Page 1 of 1

<b>Date of</b>	<b>Proceeding</b>	<b>Title/Description</b>	<b>Page No</b>
07/12/2019	ROP-MOTIONS-MF		R 2 - R 71
07/19/2019	ROP-DECISION-GR		R 72 - R 87
08/23/2019	ROP-ARGUMENT-GR		R 88 - R 107
11/07/2019	ROP-DECISION-GR		R 108 - R 113

NO. 127824

IN THE

## SUPREME COURT OF ILLINOIS

---

THE PEOPLE OF THE	)	
STATE OF ILLINOIS,	)	From the Appellate Court of
	)	Illinois, Second Judicial
Respondent-Appellant	)	District,
	)	No. 2-19-1059
	)	
	)	Appeal from the Circuit Court
LAURA EPSTEIN	)	for the 17 <sup>th</sup> Judicial Circuit,
Petitioner-Appellee,	)	Boone County, Illinois
	)	
	)	Case No. 18-CF-89
	)	Honorable
	)	JOHN YOUNG,
	)	Trial Judge Presiding

---

## TABLE OF CONTENTS TO THE RECORD ON APPEAL

## SECURED RECORD - TABLE OF CONTENTS

Page 1 of 1

**Section****Page**

SECURED COMMON LAW RECORD SECTION

SEC C 3 - SEC C 50

NO. 127824

IN THE

## SUPREME COURT OF ILLINOIS

THE PEOPLE OF THE  
STATE OF ILLINOIS,

Respondent-Appellant

LAURA EPSTEIN  
Petitioner-Appellee,

)  
 ) From the Appellate Court of  
 ) Illinois, Second Judicial  
 ) District,  
 ) No. 2-19-1059  
 )  
 ) Appeal from the Circuit Court  
 ) for the 17<sup>th</sup> Judicial Circuit,  
 ) Boone County, Illinois  
 )  
 ) Case No. 18-CF-89  
 ) Honorable  
 ) JOHN YOUNG,  
 ) Trial Judge Presiding

## TABLE OF CONTENTS TO THE RECORD ON APPEAL

## COMMON LAW RECORD - TABLE OF CONTENTS

Page 1 of 1

<u>Date Filed</u>	<u>Title/Description</u>
02/15/2019	PHARMACONSULTANT INC REPORT
02/15/2019	JAMES THOMAS O'DONNELL CV'S

<u>Page No</u>
SEC C 4 - C9
SEC C 10 - C50

/s/ Christopher J. Taylor

TAYLOR LAW P.C., Attorneys at Law (6207852)  
P.O. Box 72 Oswego,  
IL 60543  
(888) 369-3466  
Taylorlawpc@att.net



NO. 127824

IN THE

## SUPREME COURT OF ILLINOIS

---

THE PEOPLE OF THE  
STATE OF ILLINOIS,

Appellee

LAURA EPSTEIN  
Appellant,

)  
) From the Appellate Court of  
) Illinois, Second Judicial  
) District,  
) No. 2-19-1059  
)  
) Appeal from the Circuit Court  
) for the 17<sup>th</sup> Judicial Circuit,  
) Boone County, Illinois  
)  
) Case No. 18-CF-89  
Honorable  
JOHN YOUNG,  
Trial Judge Presiding

---

## STANDARD OF REVIEW

Christopher J. Taylor (6207852)

TAYLOR LAW

P.O. Box 72

Oswego, Illinois 60543

(888) 369-3466

Service via email will be accepted at [Taylorlawpc@att.net](mailto:Taylorlawpc@att.net)

E-FILED

2/8/2022 10:04 AM

CYNTHIA A. GRANT

SUPREME COURT CLERK

NO. 127824

IN THE

**SUPREME COURT OF ILLINOIS**


---

THE PEOPLE OF THE  
STATE OF ILLINOIS,

Respondent-Appellant

LAURA EPSTEIN

Petitioner-Appellee,

)  
) From the Appellate Court of  
) Illinois, Second Judicial  
) District,  
) No. 2-19-1059  
)  
) Appeal from the Circuit Court  
) for the 17<sup>th</sup> Judicial Circuit,  
) Boone County, Illinois  
)  
) Case No. 18-CF-89  
Honorable  
JOHN YOUNG,  
Trial Judge Presiding

---

**STANDARD OF REVIEW**

- I. The Correct Standard of Review is the Abuse of Discretion Standard, not De Novo, as argued by the Appellant.

The admissibility of evidence rests in the trial court's sound discretion, and its ruling will not be reversed absent an abuse of discretion. *People v. Floyd*, 2014 IL App (2d) 120507 ¶ 14. A trial court's balancing of probative value and prejudicial impact is reviewed for an abuse of discretion. *People v. Bates*, 2018 IL App (4th) 160255, ¶ 84. The argument for de novo review fails to consider that the trial court's balancing process itself deserves deference. *People v. Martinez*, 2019 IL App (2d) 170793.

/s/ Christopher J. Taylor

TAYLOR LAW P.C., Attorneys at Law (6207852)  
P.O. Box 72 Oswego,  
IL 60543  
(888) 369-3466  
Taylorlawpc@att.net

NO. 127824

IN THE

## SUPREME COURT OF ILLINOIS

---

THE PEOPLE OF THE  
STATE OF ILLINOIS,

Appellee

LAURA EPSTEIN  
Appellant,

)  
) From the Appellate Court of  
) Illinois, Second Judicial  
) District,  
) No. 2-19-1059  
)  
) Appeal from the Circuit Court  
) for the 17<sup>th</sup> Judicial Circuit,  
) Boone County, Illinois  
)  
) Case No. 18-CF-89  
Honorable  
JOHN YOUNG,  
Trial Judge Presiding

---

**NOTICE**

TO: *Illinois Supreme Court, Clerk of the Court, Supreme Court Building, 200 E. Capitol, Springfield, Illinois 62701*

*State's Attorneys Appellate Prosecutor, 2032 Larkin Avenue, Elgin, Illinois 60123 (2nddistrict.eserve@ilsaap.org)*

*Illinois Attorney General, Criminal Appeals Division, 100 W. Randolph St., 12<sup>th</sup> Floor, Chicago, Illinois 60601 (attorney\_general@ilag.gov)*

*Boone County State's Attorney, 601 N. Main Street, #302, St., Belvidere IL 61008 ([dsierens@boonecountyil.org](mailto:dsierens@boonecountyil.org))*

PLEASE TAKE NOTICE that on the 8<sup>th</sup> day of February, 2022, we have caused to be filed, electronically, via Odyssey E- File the attached TABLE OF CONTENTS TO THE RECORD ON APPEAL AND STANDARD OF REVIEW with the Clerk of the Supreme Court of Illinois in Springfield, Illinois.

Copies of said pleadings are attached hereto and herewith served upon you.



**PROOF OF SERVICE**

The undersigned, an attorney, hereby certifies that he served the TABLE OF CONTENTS TO THE RECORD ON APPEAL AND STANDARD OF REVUE upon: *Illinois Supreme Court, Clerk of the Court, Supreme Court Building, 200 E. Capitol, Springfield, Illinois 62701*

electronically, via Odyssey E- File at or before the hour of 11:00 P.M. on the 8<sup>th</sup> day of February 2022.

Further, the undersigned, an attorney, hereby certifies that he served the TABLE OF CONTENTS TO THE RECORD ON APPEAL AND STANDARD OF REVUE upon: *State's Attorneys Appellate Prosecutor, 2032*

*Larkin Avenue, Elgin, Illinois 60123* via email, at or before the hour of 11:00 P.M. on the 8th day of February 2022.

Further, the undersigned, an attorney, hereby certifies that he served the

TABLE OF CONTENTS TO THE RECORD ON APPEAL AND STANDARD OF REVUE upon: *Illinois Attorney General, Criminal Appeals*

*Division, 100 W. Randolph St., 12<sup>th</sup> Floor, Chicago, Illinois 60601 and Boone*

*County State's Attorney, 601 N. Main Street, #302, St., Belvidere IL 61008* via email, at

or before the hour of 11:00 P.M. on the 8th

day of February 2022.

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, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true

By:



Christopher J. Taylor (6207852)  
P.O. Box 72  
Oswego, IL 60543  
(888) 369-3466