

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GMAC BANK, a Utah Industrial Bank,)	
)	CIVIL ACTION
Plaintiff,)	
)	
vs.)	No. 06 CV 5291
)	
HTFC CORPORATION,)	
)	
Defendant.)	

**MEMORANDUM OF LAW IN SUPPORT OF
JOSEPH R. ZICCARDI'S MOTION FOR RECONSIDERATION**

Attorney Joseph R. Ziccardi, *pro se*, hereby submits this Memorandum of Law in Support of his Motion For Reconsideration pursuant to the Federal Rules of Civil Procedure and other applicable law.

I. INTRODUCTION

Due Process represents one of the most fundamental principles underlying the American legal system. In its simplest terms, it requires that one be afforded both notice and an opportunity to be heard before one can be deprived of certain rights or privileges – the more important the right or privilege that is in jeopardy, the more strict the standards for the process that is due prior to its deprivation.

Another important and fundamental principle of the American legal system is the notion that each of us has the right to counsel in certain situations. That principle is nearly absolute in the criminal justice context and far less certain in the civil context. Just as with Due Process, the more important the potential loss, the more likely we will be to have a right to counsel.

In both situations, the degree of protection that the law affords us is determined by the value that our legal system places on the right that is in jeopardy. In other words, our legal system has prioritized certain rights and privileges above others (e.g., freedom is more important than money) and the law affords the most protection for those rights and privileges it deems most important. What the American legal system has never done – at least not in theory – is to deem certain people more worthy, certain ideas more noteworthy or certain beliefs more legitimate than others. As to these matters, it is said, Justice is blind.

This case tests the degree to which our legal system continues to regard as fundamental some of these principles. Here, Ziccardi – an attorney with an exemplary record until this Court’s recent ruling – was deprived of his right to Due Process in connection with the Court’s consideration of whether to impose sanctions against him. That deprivation began with deficient notice as to the particular tool that the Court was considering employing to sanction him. Because that notice was deficient, his opportunity to be heard was meaningless. As a result, the Court was deprived of the opportunity to engage in meaningful fact-finding that would have revealed the falsity of certain key “facts” on which the Court largely based its ruling and would have demonstrated the truth of, among other things, the following: (1) Ziccardi never “joined in [his] client’s offensive conduct” by chuckling or otherwise – the “snicker” referenced by Mr. Bodzin in the deposition was that of Raymond Voulo, the deponent’s New York counsel; (2) Ziccardi did not “sit idly by” as a “mere spectator” and his significant, repeated efforts to curb his client’s behavior did occur, in large part, off the record, as is completely proper; and (3) Ziccardi never “dared” opposing counsel to take any action, as evidenced by an examination of the videotape, as well as opposing counsel’s actions and statements in support of Ziccardi.

The Court's reconsideration of these matters, in light of the newly available evidence and the need to correct clear errors of law and fact – would represent a productive and positive step toward repairing the “system collapse” that occurred here. A reversal of the Court's findings, conclusions and Order as they relate to Ziccardi would further the ends of justice. Upon a fair examination of what is set forth below, the Court must find that Ziccardi engaged in no wrongdoing and must find that there is no just reason that supports the entry of an Order imposing sanctions against him.

II. PROCEDURAL BACKGROUND

On September 26, 2007 and November 8, 2007 Aaron Wider, CEO of defendant corporation, was produced for deposition. Subsequently, Plaintiff filed a motion to compel and for sanctions against Defendant in the form of reimbursement of fees and costs incurred in preparing the motion to compel and for re-deposing Mr. Wider. Plaintiff's Motion to Compel sought an Order (a) compelling Wider to appear for the completion of his deposition and to fully answer the questions he improperly refused to answer and/or provided evasive or incomplete answers to at his previous deposition, (b) requiring HTFC to pay the expenses incurred by GMAC in taking the previous deposition and making this Motion, including its reasonable attorney's fees and costs; and (c) ordering that in the event Wider refuses to comply, judgment will be entered against HTFC as to both GMAC Bank's Complaint and HTFC's Counterclaim.¹ Plaintiff's Motion to Compel was not directed at Attorney Ziccardi or his conduct.

On November 30, 2007, this Court issued an Order scheduling an initial hearing on Plaintiff's Motion to Compel for December 7, 2007.² During the December 7, 2007 initial hearing on plaintiff's Motion held via telephone conference, this Court stated that it was “not

¹ See, Plaintiff's Motion to Compel, which is document no. 34 of the docket in this case.

² See, document no. 37 of the docket in this case.

really sure how to proceed here,” and that, under the Code of Professional Conduct, counsel has certain obligations as an officer of the court which have to be harmonized with counsel’s obligations to provide zealous representations.”³ Transcript of Dec. 7, 2007 Proceedings, p. 7. This Court further stated that, “at least at first glance, [Ziccardi’s] conduct implicates the Rules of Professional Conduct 3.4, 3.5 and 8.4. And it is with regret that I must conclude that. It doesn’t mean you have violated, but they have been implicated and I think they need to be explored. I will issue a rule to show cause why your pro hac vice admission should not be revoked or whether this matter should be referred to a disciplinary board, and whether or not financial penalty should also be imposed.” Transcript of Dec. 7, 2007 Proceedings, p. 7. As a result, this Court entered a Rule to Show Cause as to Why Sanctions Should Not be Entered returnable on December 21, 2007.

Following the December 7, 2007 hearing, this Court entered an Order that confirming entry of the Rule to Show Cause.⁴ In said Order, this Court advised that, “in addition to Rules 3.4, 3.5, and 8.4, the Court will also consider whether Mr. Ziccardi’s conduct violates Rules 1.1, 1.2, and 1.3 of the Pennsylvania Rules of Professional Conduct.”

On December 21, 2007 this Honorable Court conducted a hearing on Plaintiff’s Motion To Compel and the Rule to Show Cause Against Ziccardi. Consistent with its prior Orders, this Court began the hearing by stating that “We are here on a motion to compel ... and we are also here on a rule to show cause ...”⁵ Transcript of Dec. 21, 2007 Proceedings, p. 2. The Court further stated that, “Notice was provided ... in connection with the motion to compel, which implicates conduct under Rule 30(c)(3), as well as 30(b)(2), and sanctions under Rule 37,” and

³ The transcript of December 7, 2007 hearing is document no. 42 of the docket in this case.

⁴ See, document no. 40 of the docket in this case.

⁵ The Transcript of December 21, 2007 hearing is document no. 47 of the docket in this case.

that “in connection with the rule to show cause, the Court will consider counsel’s duty during the course of the deposition and it implicates a number of provisions of the Pennsylvania Rules of Professional Conduct.” Transcript of Dec. 21, 2007 Proceedings, p. 2, l. 14-17.

Following the hearing on plaintiff’s Motion to Compel, this Court turned to the Rule to Show Cause hearing. In connection therewith, this Court stated, “There are a number of rules of professional conduct which I think are implicated. And I do not doubt that off the record you made every effort, you don’t have to go into that. I’m limiting myself to what is apparent on the record, including whether the lawyers shall not engage in conduct intended to disrupt the tribunal, that includes a deposition, that’s Rule of Professional Conduct 3.5, Comment 5. It also involves attempts to unlawfully obstruct another party’s access to evidence, including obstructive tactics in the discovery process, that’s Professional Conduct Rule 3.4, Comment 1. There are – Rule 3 requires a lawyer to take reasonable remedial measures if a lawyer comes to know that a client who is testifying in a deposition has offered evidence that is false.” Transcript of Dec. 21, 2007 Proceedings, pp. 13-14.

At the conclusion of the hearing, this Court further stated that, “concerning the rule to show cause, that also implicates, as I have no said on at least two occasions, the role of counsel during the course of depositions. And I had identified previously in the rule to show cause Pennsylvania Rule of Professional Conduct 3.4 or 3.5, 8.4 as well as 3.2 and 3.3.” Transcript of Dec. 21, 2007 Proceedings, p. 18, l. 14-19. The Court concluded the hearing by providing additional time, until January 3, 2008, for the parties to make additional submissions, after which the Court would issue a ruling “promptly thereafter.” Transcript of Dec. 21, 2007 Proceedings, pp. 18-19.

On January 3, 2008, the parties filed their additional submissions. The brief filed by defendant addressed Ziccardi's conduct as it related to the Rules of Professional Conduct cited by this Court in the December 7, 2007 hearing and Order, and at the December 21, 2007 hearing. Defendant's brief did not address Ziccardi's conduct as it related to FRCP 30 or FRCP 37. In its additional submission, plaintiff did not address Ziccardi's conduct or otherwise request that sanctions be imposed against Ziccardi.

On February 29, 2008, this Court issued its Memorandum Opinion and Order sanctioning Ziccardi pursuant to FRCP 30 and 37 for his conduct during the depositions of defendant's representative. For the reasons herein set forth, Ziccardi now moves for reconsideration of that portion of this Court's February 29, 2008 order finding that he violated FRCP 30 and FRCP 37, and imposing sanctions on him for said violations.

III. THE LEGAL STANDARD

"The purpose of a motion for reconsideration," as noted by the Third Circuit Court of Appeals," is to correct manifest errors of law or fact or to present newly discovered evidence.' *Max's Seafood Café v. Quinteros*, 176 F.3d 669, 677 (3d Cir.1999) (quoting *Harsco Corp. v. Zlotnicki*, 779 F.2d 906, 909 (3d Cir.1985)). "Accordingly, a judgment may be altered or amended if the party seeking reconsideration shows at least one of the following grounds: (1) an intervening change in the controlling law; (2) the availability of new evidence that was not available when the court granted the motion for summary judgment; or (3) the need to correct a clear error of law or fact or to prevent manifest injustice." (citing *North River Ins. Co. v. CIGNA Reinsurance Co.*, 52 F.3d 1194, 1218 (3d Cir.1995)).

IV. ARGUMENT

A. **ZICCARDI WAS DENIED DUE PROCESS WHEN THE COURT FAILED TO PROVIDE HIM WITH NOTICE OF THE PRECISE SANCTIONING TOOL THAT IT INTENDED TO EMPLOY.**

“The Due Process Clause of the Fifth Amendment requires a federal court to provide notice and an opportunity to be heard before sanctions are imposed on a[n] ... attorney.” Martin v. Brown, 63 F.3d 1252, 1262 (3d Cir. 1995). The Third Circuit Court of Appeals has held that “particularized notice is required to comport with due process.” Fellheimer, Eichen & Braverman, P.C. v. Charter Technologies, Inc., 57 F.3d 1215, 1225 (3d Cir. 1995). “Generally speaking, particularized notice will usually require notice of the precise sanctioning tool that the court intends to employ.” Id. An opportunity to be heard is “especially important” where a lawyer or firm’s “reputation is at stake,” because sanctions “act as a symbolic statement about the quality and integrity of an attorney’s work – a statement which may have a tangible effect upon the attorney’s career.” Id. at 1227.

Here, the “notice” prong of the Due Process that the Court afforded Ziccardi is found in the Rule To Show Cause that it issued on December 7, 2007. See, Dec. 7, 2007 Order issuing Rule To Show Cause. That Order incorporates by reference the Court’s comments during the telephone conference that was held earlier that day, during which the Court said that:

Under the Code of Professional Conduct, counsel has certain obligations as an officer of the court which have to be harmonized with counsel’s obligations to provide zealous representations. In this particular case, once a witness or deponent conducts himself in the manner which is designating to obstruct the proceedings, I don’t think counsel can just sit idly by and do nothing. I would equate it to a situation where a witness is providing false and perjurious testimony and counsel is aware of it, and under the Rules it requires that counsel discuss the matter with his client and if the client refuses to correct and remedy the testimony, then counsel has an obligation to correct it and/or withdraw from the proceedings. I think that at least at first glance, Mr. Ziccardi, I think your conduct implicates the Rules of Professional Conduct 3.4, 3.5 and 8.4. And it is with regret that I must conclude that. It doesn’t mean you have violated, but they

have been implicated and I think they need to be explored. I will issue a rule to show cause why your pro hac vice admission should not be revoked or whether this matter should be referred to a disciplinary board, and whether or not financial penalty should also be imposed.

Transcript of Dec. 7, 2007 Proceedings, pp. 7-8.

At no time did Ziccardi have any indication that the Court was considering imposing sanctions *upon him* by means of either FRCP 30 or FRCP 37. To the contrary, the Court's relevant Orders and statements were clear to differentiate, as the Court did at the December 21, 2007 hearing, stating that:

“We are here on a motion to compel ... and we are also here on a rule to show cause ... Notice was provided ... in connection with the motion to compel, which implicates conduct under Rule 30(c)(3), as well as 30(b)(2), and sanctions under Rule 37. ... In connection with the rule to show cause, the Court will consider counsel's duty during the course of the deposition and it implicates a number of provisions of the Pennsylvania Rules of Professional Conduct.”

Transcript of Dec. 21, 2007 Proceedings, p. 2, l. 14-17.

Consistently, the Court was extremely careful to address the Rule To Show Cause separately and distinct from all other pending matters, especially the Motion To Compel that had been filed against Defendant pursuant to FRCP 30 and 37. At no time did the Court ever indicate – let alone provide particularized notice – that it intended to employ either Rule 30 or 37 as a sanctioning tool against Ziccardi. For example, during the December 7, 2007 telephone conference, the Court was extremely cautious in addressing the two matters separately. *See generally*, Transcript of Dec. 7, 2007 Proceedings, p. 7. As further evidence of the Court's distinction between the two matters, later that same day the Court issued two separate orders: one Order relating strictly to plaintiff's motion to compel, brought pursuant to FRCP 30 and 37 (Doc. 41), the other issuing the Rule To Show Cause based on certain Rules of Procedural Conduct that the Court believed had been implicated by Ziccardi's conduct at the depositions (Doc. 40).

The imposition of sanctions against Ziccardi pursuant to FRCP 30 and 37 violates Ziccardi's Due Process rights, as the record demonstrates that prior to the issuance of the Court's February 29, 2008 Memorandum Opinion, Ziccardi had absolutely no notice that the Court was considering imposing sanctions upon him pursuant to FRCP 30 and/or 37. The Court's statement that, "Ziccardi has received ample notice of the specific sanctions considered by the Court and an opportunity to be heard," (*see*, Memorandum Opinion at p. 29, fn. 14) is a misapplication of the relevant law to the facts of this case. Accordingly, the Court's use Rules 30 and 37 as the applicable legal standard is a clear error of law, and the imposition of sanctions against Ziccardi should not stand.

B. BECAUSE THE COURT'S FEBRUARY 29, 2008 MEMORANDUM OPINION AND ORDER ARE BASED ON CLEAR ERRORS OF FACT, THE COURT SHOULD, UPON RECONSIDERATION, FIND THAT ZICCARDI DID NOT ENGAGE IN ANY CONDUCT THAT WOULD WARRANT THE IMPOSITION OF SANCTIONS AGAINST HIM, AND SHOULD MODIFY AND VACATE ITS MEMORANDUM OPINION AND ORDER ACCORDINGLY

The Court's Opinion must also be reconsidered and its Order amended to correct a number of clear errors of fact. The Court summarizes Ziccardi's conduct by saying that he "sat idly by as a mere spectator to Wider's ... behavior; and when he did speak, he either incorrectly directed the witness not to answer, dared opposing counsel to file a motion to compel, or even joined in the offensive conduct." Opinion at pp. 30-31. (Footnotes omitted.)

The conclusion that Ziccardi "joined in the offensive conduct" is based solely on the Court's erroneous belief that it was Ziccardi who "chuckl[ed] at Wider's abusive behavior toward counsel for GMAC." As the Court correctly noted, there were two attorneys who appeared on Wider's behalf at his deposition, Ziccardi and Raymond Voulo, Wider's New York counsel. At no time did Ziccardi "chuckle," "snicker" or otherwise condone Wider's disruptive

conduct. Ziccardi Affidavit, ¶ 22;⁶ Voulo Affidavit, ¶ 9.⁷ The comment by plaintiff's counsel that the Court cites ("You know, your snickering counsel is not appropriate either because all you're doing is encouraging the behavior of your client") was not directed at Ziccardi (Voulo Affidavit, ¶ 9), but rather at Mr. Voulo (Ziccardi Affidavit, ¶ 22). The reason that plaintiff's counsel directed that statement at Mr. Voulo is that Mr. Voulo was the "counsel" who chuckled, or made some other non-verbal comment, at Wider's offensive conduct. Thus, the Court's conclusion that Ziccardi "joined in Wider's offensive conduct" is clearly in error.

Nor did Ziccardi "dare[] opposing counsel to file a motion to compel," as the Court erroneously concludes. The best evidence of this point may be the fact that plaintiff's Motion to Compel was not directed at Ziccardi, nor is there any mention of Ziccardi in plaintiff's Motion. That, however, is not the only evidence. While it is true that Ziccardi made the statements that the Court cites in connection with this issue (e.g., "file whatever motion you want to file"), it is not true that those statements represented a "dare" or "challenge" to opposing counsel, Mr. Bodzin. To the contrary, those statements were an acknowledgment by one lawyer to another that there was no point in arguing the issue during an already contentious proceeding. It was an offer to "agree to disagree" so that the deposition could proceed. This is evidenced by Ziccardi's even tone and mild demeanor as captured on the videotape of the deposition.

The February 29, 2008 Order is also based on assumptions that the facts demonstrate are incorrect. For example, this Court asserts that an on-the-record admonition would have curbed Wider's conduct. As the attached affidavits establish, Wider was repeatedly admonished by two

⁶ The Affidavit of Joseph R. Ziccardi is attached hereto as Exhibit A. Said affidavit contains evidence which was unavailable as of the December 21, 2007 hearing, given that Ziccardi was counsel of record for defendant. As of the filing of this Motion, Ziccardi has moved to withdraw from defendant's representation, and Wider has consented to disclosure of the statements set forth in said affidavit.

⁷ The Affidavit of Raymond Voulo is attached hereto as Exhibit B.

attorneys, yet he disregarded those admonitions and continued his conduct.⁸ Wider was also repeatedly instructed as to proper conduct during the deposition, and warned by two attorneys that if his conduct continued, he would likely be fined, sanctioned or have a judgment entered against HTFC. Under these circumstances, the Court's assumption that statements on the record would have terminated Wider's conduct is in error.⁹

This Court's decision further assumes that a lawyer has an obligation to admonish his client on the record. The Federal Rules of Civil Procedure do not set forth such a requirement, and it fails to account for an attorney's obligation to his client pursuant to the Rules of Professional Conduct. "An attorney stands in a fiduciary relationship to the client." *Estate of Re v. Kornstein, Veisz & Wexler*, 958 F.Supp. 907, 924 (S.D.N.Y. 1997). "As such, an attorney is charged with a high degree of undivided loyalty to his client." *Id.*, 958 F.Supp. at 924. Moreover, "the fiduciary obligations an attorney owes his clients are among the most stringent to be found. It is axiomatic that an attorney who undertakes representation of a client owes that client both a duty of competent representation and the highest duty of honesty, fidelity and confidentiality." *Milgrub v. Continental Casualty Company*, 2007 WL 625039 (W.D.Pa. 2007).

This Court's Memorandum and Opinion fails to acknowledge the conflict facing Ziccardi during the depositions. Either he admonished his client on the record, risking a claim for violation of his ethical obligation to his client, or he terminated the deposition, risking interference with plaintiff's right to depose Wider and violation of the Federal Rules of Civil Procedure. This was an untenable position, fraught with peril in either situation. Given this

⁸ The Affidavit of Aaron Wider is attached hereto as Exhibit C.

⁹ As the transcripts indicate, even in instances in which Ziccardi instructed Wider on the record to respond or answer the question, he nevertheless refused to do so.

conflict, the Court's finding of violation of FRCP 30 and 37, and the imposition of sanctions, was clear error, and it should not stand.

C. ZICCARDI WAS DEPRIVED OF ANY OPPORTUNITY TO OBJECT TO PLAINTIFF'S DEFICIENT "FEE PETITION" WHICH FAILED TO PROVIDE A REASONABLE BASIS FOR THE COURT'S DETERMINATION OF THE AMOUNT OF THE MONETARY SANCTION IMPOSED UPON ZICCARDI.

Assuming *arguendo* that the imposition of sanctions against Ziccardi was appropriate, the monetary amount of the sanction imposed is not sufficiently supported by the record. Moreover, Ziccardi had no opportunity to raise this issue prior to the entry of the Court's February 29, 2008 Order. Therefore, at a minimum, the Court should vacate those portions of its Order that require Ziccardi to make payment to plaintiff in those unsupported and improperly determined amounts (\$13,026.00 and \$16,296.61).

"The party seeking attorneys' fees has the burden of establishing the reasonableness of the fees by submitting evidence supporting the hours worked and the rates claimed." Apple Corps Limited, MPL v. International Collectors Society, 25 F.Supp.2d 480, 485 (D.N.J. 1998). To meet this burden, counsel "must produce satisfactory evidence – in addition to [their] own affidavits – that the requested rates are in line with those prevailing in the community for similar services by lawyers of reasonably comparable skill, experience and reputation." Id., citing Blum v. Stenson, 465 U.S. 886, 104 S.Ct. 1541, 79 L.Ed.2d 891 (1984). Further, "counsel seeking attorneys' fees must document the hours for which payment is sought with sufficient specificity to allow the district court to determine if the hours claimed are unreasonable for the work performed." Apple Corps, 25 F.Supp.2d at 486. "The fee petition must include some fairly definite information as to the hours devoted to various general activities, ..., and the hours spent by various classes of attorneys." Id.

This Court's determination of the amount of the monetary sanction that it ordered Ziccardi to pay was based solely on the general, conclusory, and unsupported statements contained in the affidavits of plaintiff's counsel. Plaintiff had the burden to establish that the fees sought were reasonable, both with regard to the number of hours spent and the hourly rate charged. However, plaintiff failed to produce any itemized billing statement(s) or other documentation of the tasks performed, the time spent on those tasks, or any detailed information from which this Court could determine whether the hours claimed were reasonable for the work performed. Nor did plaintiff submit any evidence demonstrating that the hourly rate of each of its attorneys was reasonable and in line with prevailing rates in the community. Instead, plaintiff submitted only the affidavits of counsel setting forth the total number of hours spent, and the attorney's hourly billable rate. See Affidavit of Robert B. Bodzin (Doc. 49, pp. 5-6) and Affidavit of Donald G. Heeman (Doc. 49, pp. 8-9), both filed January 3, 2008.

Such affidavits are insufficient to sustain plaintiff's burden in this regard, and the award of sanctions in an amount supported only by these general and unsupported allegations should not stand.

In its February 29, 2008 Memorandum, this Court stated that, "HTFC has not objected to [plaintiff's] fee petition."¹⁰ While that is true, the Court overlooks the fact that Ziccardi never had *an opportunity* to object to the "fee petition" or to raise the issue subsequent to its filing. At the conclusion of the December 21, 2007 hearing, the Court stated that, "If the parties wish to make any further submission ... I look forward to receiving those submissions by the 3rd of January. Promptly thereafter, then I will issue a decision[.]" Transcript of Dec. 21, 2007 Proceedings, p. 19, lines 1-5.

¹⁰ *See*, Feb. 29, 2008 Order, Sec. III(B)(3)(a), p. 27, and Sec. III(B)(3)(b), p. 28, both of which are adopted by this Court in its discussion of sanctions against Ziccardi. *See*, Feb. 29, 2008 Order, Sec. IV(B)(3)(a), p. 39, and Sec. IV(B)(3)(b), p. 41.

That “fee petition,” however, was part of plaintiff’s Supplemental Memorandum (Doc. 49), which was filed on the same day that HTFC filed its Supplemental Memorandum (Doc. 48), as this Court ordered at the conclusion of the December 21, 2007 hearing. Specifically, this Court stated that it would “look forward to receiving those submissions by the 3rd of January, and promptly thereafter, [the Court would] issue a decision on these matters [to which] the parties have had an opportunity to respond.” *See*, Transcript of Dec. 21, 2007 hearing, p. 19.

Because the parties’ submissions were due to be filed (and were filed) on the same day, Ziccardi had no opportunity to respond to the plaintiff’s “fee petition” or to object to the deficiencies therein. Based on this Court’s statements at the conclusion of the December 21, 2007 hearing that a decision would be rendered “promptly thereafter,” additional submissions were not invited, and Ziccardi had no opportunity to be heard on this issue.

Accordingly, because the plaintiff failed to sustain its burden to establish that the attorneys’ fees and costs sought were reasonable, and due to the lack of opportunity afforded to Ziccardi to be heard on this issue, the Order imposing sanctions in that amount must be vacated.

Respectfully submitted,

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