

1 Samantha K. DuMond | 031072
2 **DUMOND LAW FIRM, PLLC**
3 340 East Palm Lane, Suite A100
4 Phoenix, AZ 85004
5 Phone: (602) 803-4975
6 Facsimile: (602) 680-3330
7 Samantha@DuMondLawAZ.com

8 Mark G. Weinberg, *Pro Hac Vice forthcoming*
9 **LAW OFFICE OF MARK G. WEINBERG**
10 3612 N. Tripp Avenue
11 Chicago, Illinois 60641
12 Telephone: (773) 283-3913
13 Email: MWeinberg@sbcglobal.net

14 Adele D. Nicholas, *Pro Hac Vice forthcoming*
15 **LAW OFFICE OF ADELE D. NICHOLAS**
16 5707 W. Goodman Street
17 Chicago, Illinois 60630
18 Telephone: (847) 361-3869
19 Email: Adele@civilrightschicago.com

20 Attorneys for Plaintiffs

21 **IN THE UNITED STATES DISTRICT COURT**
22 **FOR THE DISTRICT OF ARIZONA**

23 Kenneth Soule; Luis Armenta; Joshua
24 Harroun; and Brian Carey; individually
25 and on behalf of all others similarly
26 situated,

27 Plaintiffs,

28 vs.

Michael Cimino, in his official capacity
as Chief Probation Officer of the
Maricopa County Adult Probation
Department,

Defendant.

No.

**COMPLAINT FOR DECLARATORY
AND INJUNCTIVE RELIEF
PURSUANT TO 42 U.S.C. § 1983**

CLASS ACTION

1 Plaintiffs Kenneth Soule, Luis Armenta, Joshua Harroun, and Brian Carey,
2 individually and on behalf of all others similarly situated, bring this civil rights class action
3 against Michael Cimino, in his official capacity as Chief Probation Officer of the
4 Maricopa County Adult Probation Department. Plaintiffs allege as follows:

5
6 **PRELIMINARY STATEMENT**

7 This is a civil rights class action brought pursuant to 42 U.S.C. § 1983 on behalf of
8 individuals under the supervision of the Maricopa County Adult Probation Department
9 (“MCAPD”). Plaintiffs challenge the constitutionality of the Department’s policy and
10 practice of restricting Internet access for individuals on probation who are classified as
11 sex offenders.
12

13 Although Arizona law grants probation departments discretion in imposing
14 supervision conditions, the policy at issue functions as a *de facto*, indefinite ban on
15 Internet use. This indefinite ban is imposed on sexual offenders without clear and definite
16 standards, without meaningful opportunity for review, and without any individualized
17 assessment that the ban is necessary to achieve public safety goals. As a result, sex
18 offender probationers are denied access to employment opportunities, educational
19 programs, healthcare portals, religious services, financial institutions, and essential
20 communication with loved ones.
21

22
23 These broad, standardless restrictions violate Plaintiffs’ rights under the First and
24 Fourteenth Amendments to the United States Constitution. Plaintiffs seek declaratory and
25 injunctive relief on behalf of themselves and a proposed class of similarly situated
26 individuals to invalidate the challenged policy and to ensure that Internet access
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28

1 determinations are governed by fair, individualized standards consistent with
2 constitutional protections.

3 **Jurisdiction and Venue**

- 4 1. Plaintiffs' claims are brought pursuant to 42 U.S.C. § 1983.
5 2. Jurisdiction is proper under 28 U.S.C. §§ 1331 and 1343(a). Plaintiffs seek redress
6 for the deprivation of rights secured by the United States Constitution.
7 3. The declaratory and injunctive relief sought by Plaintiffs is authorized by 28 U.S.C.
8 §§ 2201 and 2202, Fed. R. Civ. P. 57 and 65, and by the legal and equitable powers of this
9 Court.
10 4. Venue is proper in the District of Arizona pursuant to 28 U.S.C. § 1391(b)(2).
11 Plaintiffs and Defendant reside in this District, and a substantial part of the events giving
12 rise to the claims occurred within this District.
13
14

15 **Parties**

- 16 5. Plaintiffs Kenneth Soule; Luis Armenta; Joshua Harroun; and Brian Carey are all
17 residents of Maricopa County who are on lifetime probation under the supervision of the
18 Maricopa County Adult Probation Department following convictions for sex offenses.
19 They are all subject to the challenged policies and practices of the Maricopa County Adult
20 Probation Department.
21 6. Defendant Michael Cimino is the Chief Probation Officer of the Maricopa County
22 Adult Probation Department ("MCAPD"), a division of the Arizona judiciary. He is
23 responsible for the administration, supervision, and enforcement of the policies and
24 practices challenged in this Complaint, including the MCAPD's policy of restricting
25 Internet access for individuals on probation who are required to register as sex offenders.
26
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1 Defendant Cimino has direct authority over probation officers and policy implementation
2 within the MCAPD. He is sued in his official capacity for purposes of declaratory and
3 injunctive relief.

4 **The Maricopa County Adult Probation Department’s**
5 **Current Internet Policy**

6 7. Individuals subject to the supervision and control of the MCAPD for sex offenses
7 are required to agree to Sex Offender Special Conditions of Probation (“Sex Offender
8 Special Conditions”) which include Uniform Conditions 20 and 21, which govern the
9 conditions under which persons under supervision may access the internet and internet
10 capable devices (“Computer Usage Conditions”).

11
12 8. The conditions are interdependent and enforced collectively. The Special
13 Conditions serve as the basis for Defendants’ imposition of the Computer Usage
14 Conditions, which function as an extension of the restriction imposed by the Uniform
15 Conditions.

16
17 9. The relevant portions of the Sex Offender Special Conditions are as follows:

18 a. “20. I will obtain prior written approval of the APD before using any device
19 that has Internet access capability.”

20 b. “21. I will obtain prior written approval of the APD before using any
21 computer equipment or accessing the Internet. If granted use or access, I will
22 abide by the APD Computer Usage Conditions set forth on page-two.”
23

24
25 10. The Computer Usage Conditions impose additional restrictions, including but not
26 limited to:

- a. Requiring disclosure and approval of any owned or accessed devices, software, or peripherals;
- b. Mandatory installation of monitoring software at the probationer's expense;
- c. Prohibiting the use of third-party computers or unauthorized social networking;
- d. Requiring prior approval to create or maintain any Internet or communication service accounts;
- e. Granting the Adult Probation Officer (APO) the right to seize, inspect, or monitor devices;
- f. Prohibiting possession of hardware/software that could circumvent monitoring;
- g. Permitting emergency access only on a discretionary, case-by-case basis with no defined standards.

Blanket Internet Restrictions Imposed by PCAPD

11. The Maricopa County Adult Probation Department (“MCAPD”) enforces a blanket policy restricting Internet access for individuals on probation who are required to register as sex offenders, regardless of their offense history, level of supervision, or demonstrated progress in rehabilitation.

12. This restriction is not limited to particular types of conduct or risk categories. Instead, it is applied categorically to anyone on probation subject to sex offender registration, often for months or years after release, with no individualized showing of necessity.

1 13. Probationers subject to this policy are prohibited from using the Internet for core
2 aspects of modern life, including employment, communication, education, healthcare,
3 religious participation, and financial management.

4 **Application of this Policy to Probationers**

5 14. The policy is applied as a condition of probation or supervision without regard to
6 whether the person’s underlying offense involved any use of the Internet or electronic
7 communication.
8

9 15. Probationers who request permission to use the Internet are routinely told it is “not
10 appropriate at this time” or that approval will be considered “later,” without any indication
11 of what criteria govern such decisions.
12

13 16. This restriction applies not only to new probationers, but to individuals who have
14 been in full compliance with all other terms of their supervision, including group therapy,
15 polygraph examinations, and maintenance reporting.
16

17 **No Written Standards, Timeframes, or Appeals**

18 17. MCAPD does not publish or circulate any written guidelines or procedures
19 describing when or how a registrant on probation may obtain Internet access.

20 18. There is no timeline for reconsideration, no documented review process, and no
21 formal method for appealing a denial within the department.
22

23 19. The lack of standards leaves probationers uncertain about what steps, if any, would
24 lead to a change in their status and prevents them from challenging or meaningfully
25 contesting restrictions imposed upon them.
26
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Discretion Left to Individual Probation Officers

1
2 20. The decision to permit or deny Internet access is left to the discretion of individual
3 probation officers or unit supervisors, with no requirement that they document their
4 reasoning or follow consistent protocols.

5
6 21. As a result, similarly situated individuals may face widely varying outcomes
7 depending on the personal views or preferences of their assigned officers, rather than any
8 objective, constitutionally sound criteria.

9
10 22. This unchecked discretion has led to indefinite and arbitrary restrictions that fail to
11 account for individualized rehabilitation, risk, or the necessity of digital access for
12 successful reintegration.

Facts Pertinent to the Named Plaintiffs

13
14 **Kenneth Soule**

15
16 23. Plaintiff Kenneth Soule, 52, is a resident of Maricopa County, Arizona.

17
18 24. Plaintiff Soule is currently serving two sentences of lifetime probation under the
19 supervision of the Maricopa County Adult Probation Department following convictions
20 for child molestation, attempted sexual conduct with a minor, and sexual abuse.

21
22 25. Plaintiff Soule was incarcerated for 17 years and released on April 16, 2022.

23
24 26. His convictions did not involve the use of the Internet or any other form of
25 electronic communication.

26
27 27. Plaintiff Soule has completed his sexual history polygraph and multiple
28 maintenance polygraphs. He attends monthly maintenance therapy and previously
participated in weekly group sessions as a part of his sex offender treatment program.

1 28. For more than two years, Plaintiff Soule has repeatedly requested permission to
2 access the Internet. His requests have been denied without explanation beyond vague
3 statements that it is “not appropriate” at this time. The Maricopa County Probation
4 Department has given Plaintiff Soule no reason for the denial and no timeline for obtaining
5 Internet access.
6

7 29. Plaintiff Soule seeks to use the Internet to seek employment opportunities and
8 facilitate access to online banking, healthcare, and religious services. As a result of the
9 prohibition on his Internet access, Plaintiff Soule is unable to apply for jobs, manage his
10 investments, view online church services or perform research related to his genealogy
11 hobby.
12

13 30. Plaintiff Soule’s inability to use the Internet has led him to turn down job interviews
14 that were conducted exclusively online.
15

16 31. Plaintiff Soule is subject to the challenged Internet access policy, which imposes
17 blanket restrictions without individualized assessment, procedural protections, or
18 meaningful review.
19

20 **Luis Armenta**

21 32. Plaintiff Luis Armenta, 30, is a resident of Maricopa County, Arizona.

22 33. Plaintiff Armenta is currently on lifetime probation under the supervision of the
23 Maricopa County Adult Probation Department following convictions for three counts of
24 attempted sexual conduct with a minor.
25

26 34. Plaintiff Armenta was incarcerated for six and a half years and was released on
27 October 30, 2024.
28

1 35. His convictions did not involve the use of the Internet or any electronic
2 communication.

3 36. Plaintiff Armenta has completed group therapy sessions as directed and has
4 complied with the conditions of his probation. Initially, he was informed by the Maricopa
5 County Adult Probation Department that he might be granted internet access after
6 attending his group therapy classes within a year.
7

8 37. Despite this, he remains prohibited from accessing the Internet. He has repeatedly
9 requested permission to use the Internet, but his requests have been denied without clear
10 explanation.
11

12 38. Plaintiff Armenta is prohibited from accessing online platforms that are necessary
13 for employment, banking, healthcare, communication, and daily life. He is unable to
14 search for jobs suited to his education, use online banking services for direct deposit and
15 financial management, access digital coupons or store discounts, communicate with
16 family and friends through e-mail, or view instructional videos for basic household tasks.
17

18 39. Plaintiff Armenta's inability to access the Internet has forced him to rely on others
19 for basic information such as job postings, directions, weather, transit updates, and
20 engaging in e-mail correspondence, which has significantly limited his independence.
21

22 40. Plaintiff Armenta is subject to the challenged Internet access policy, which imposes
23 blanket restrictions without individualized assessment, procedural protections, or
24 meaningful review.
25

26 **Joshua Harroun**

27 41. Plaintiff Joshua Harroun, 43, is a resident of Maricopa County, Arizona.
28

1 42. Plaintiff Harroun is currently on lifetime probation under the supervision of the
2 Maricopa County Adult Probation Department following a conviction for three counts of
3 child molestation.

4 43. Plaintiff Harroun was incarcerated for eight and a half years and was released on
5 September 14, 2024.
6

7 44. His conviction did not involve the use of the Internet or any electronic
8 communication.

9 45. Plaintiff Harroun has complied with the conditions of his probation, including
10 attending mandated treatment and maintenance therapy. He was told he might be
11 permitted Internet access after completing classes but has received no formal timeline or
12 standards for eligibility.
13

14 46. Despite multiple requests, Plaintiff Harroun remains prohibited from accessing the
15 Internet. He is permitted only limited use at the Goodwill Career Center, which imposes
16 significant restrictions on time and privacy.
17

18 47. Plaintiff Harroun has been accepted to Glendale Community College but cannot
19 enroll due to the inability to participate in required online coursework. He seeks a career
20 in transportation logistics but needs Internet access to pursue his profession of choice.
21 Plaintiff Harroun has offered to pay for monitoring software on a personal smartphone in
22 order to enable Internet access, but this proposal was denied without explanation. He is
23 unable to pursue a commercial driver's license (CDL) because required appointments and
24 assessments occur via video platforms he is not permitted to use.
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1 48. Plaintiff Harroun's family lives 2,000 miles away in Minnesota, and he is unable
2 to use email or zoom to maintain regular communication with them. In addition, the
3 prohibition on Internet access prevents Plaintiff Harroun from using online banking
4 services for direct deposit and utilizing common applications such as Lyft for
5 transportation.
6

7 49. As a result, Plaintiff Harroun is excluded from basic tools necessary for education,
8 employment, healthcare, and social integration. He is forced to rely on others for simple,
9 everyday tasks such as checking the weather, accessing public transit routes, or finding
10 job listings.
11

12 50. Plaintiff Harroun is subject to the challenged Internet access policy, which imposes
13 blanket restrictions without individualized assessment, procedural safeguards, or
14 meaningful opportunity for review.
15

16 **Brian Carey**

17 51. Plaintiff Brian Carey, 58, is a resident of Maricopa County, Arizona.

18 52. Plaintiff Carey is currently on lifetime probation under the supervision of the
19 Maricopa County Adult Probation Department following convictions for attempted sexual
20 conduct with a minor and molestation of a child.
21

22 53. Plaintiff Carey was incarcerated for seventeen years and was released on August
23 28, 2022.

24 54. His convictions did not involve the use of the Internet or any electronic
25 communication. Since his release from prison, he has passed four polygraphs, reaffirming
26 no past or present misuse of the Internet.
27
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1 55. Plaintiff Carey has complied with the conditions of his probation, including
2 completing his sexual history polygraph, passing three maintenance polygraphs, and
3 completing his sex offender group therapy requirement in April of 2025. Plaintiff Carey
4 also completed substance abuse relapse prevention in November of 2025.

5 56. In May of 2024, Plaintiff Carey was granted Internet access exclusively at his work
6 at the Eagle’s Nest Ministries, a religious organization that provides housing for people
7 convicted of sex offenses. In conjunction with being granted the ability to use the Internet
8 at work, Plaintiff Carey was required to install the monitoring software program called
9 “Covenant Eyes” on his work computer. His computer at work is owned by Eagles’ Nest
10 Ministries.
11

12 57. But the Maricopa County Adult Probation Department still prohibits Plaintiff
13 Carey from accessing the Internet at home unless he installs costly and intrusive
14 surveillance software, which exposes him to potential cybersecurity risks. Plaintiff Carey
15 has offered to install and use Covenant Eyes monitoring software (the same software on
16 his work computer) at his own expense on his home computer but was denied that request.
17

18 58. Instead, MCAPD only allows RemoteCOM’s surveillance software which behaves
19 like spyware, recording keystrokes, capturing screenshots, and sending out alerts if the
20 tracked person types certain keywords. More concerning than the level of surveillance
21 RemoteCOM’s software promotes is the significant data breach¹ that occurred in
22 September of 2025 wherein a hacker was able to recover files of “clients” (around 14,000
23
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27 ¹ Arntz, Peter. Sex offenders, terrorists, drug dealers, exposed in spyware breach.
28 Malwarebytes. September 29, 2025. <[Sex offenders, terrorists, drug dealers, exposed in spyware breach | Malwarebytes](#)>

1 individuals) listing names, email addresses, IP addresses, home addresses, phone
2 numbers, and the names and emails of their probation officers, alongside the details of the
3 offenses the clients were charged with. For a probationer like Carey who wishes to re-
4 enter a career as an accountant, the use of this software is impossible as client's private
5 information would be exposed to RemoteCOM's internal files and to potential hackers.
6 Not only is RemoteCOM's software unsafe, but it is costly, imposing a financial burden
7 Plaintiff Carey struggles to meet.
8

9 59. The Maricopa County Adult Probation Department has not given Plaintiff Carey
10 any reason for the denial of Internet access at his home and no timeline for obtaining
11 Internet access at his home without burdensome and intrusive surveillance software.
12

13 60. Due to these restrictions, Plaintiff Carey is unable to work remotely, regain his
14 certified public accounting license, or pursue online educational opportunities at home.
15 Time restrictions at the Eagles' Nest work site don't allow for enough hours for both work
16 and continuing education opportunities. While he can use a smartphone at home, he can't
17 use it to further his career.
18

19 61. The policy has significantly obstructed Plaintiff Carey's efforts to achieve
20 economic independence and social reintegration. His professional opportunities remain
21 severely constrained by the limitations imposed on his access to the Internet. In 2025,
22 Plaintiff Carey's income rose to approximately \$45,000, a \$15,000 increase from 2024
23 due to his ability to have Internet access at work. Plaintiff Carey requires home access to
24 regain his professional credentials, add new, more relevant technical skills, and grow his
25 accounting business.
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1 62. Plaintiff Carey is subject to the challenged Internet access policy, which imposes
2 blanket restrictions without individualized assessment, valid criteria or meaningful
3 review.

4 **Class Allegations**

5 63. Plaintiffs bring this action pursuant to Rule 23 of the Federal Rules of Civil
6 Procedure on behalf of themselves and all others similarly situated.

7 64. Plaintiffs seek to represent the following class: All individuals who are currently,
8 or will in the future be, on probation under the supervision of the Maricopa County Adult
9 Probation Department, who are required to register as sex offenders, and who are or will
10 be subject to the Department's restrictions on Internet or computer access.

11 65. The members of the proposed class are so numerous that joinder of all members is
12 impracticable. Upon information and belief, over ten thousand individuals are currently
13 registered as sex offenders in Arizona, and a substantial portion of those on probation in
14 Maricopa County are subject to the Department's Internet restrictions, with additional
15 individuals entering supervision on a rolling basis.

16 66. Common questions of law and fact exist. These questions include, but are not
17 limited to:

- 18
- 19 a. Whether the Department's Internet access policy constitutes a blanket
20 restriction imposed without individualized assessment;
 - 21 b. Whether the policy violates the First Amendment rights of probationers and
22 whether any compelling government interest supports such a restriction;
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- c. Whether the policy is unconstitutional on its face for failing to set objective standards, timelines, or procedures for seeking Internet access;
- d. Whether the policy sets forth adequate criteria for denying Internet access to individuals who are subject to the Internet policy; and
- e. Whether the policy sets forth any deadlines by which determinations for allowing Internet access must be made.

67. Plaintiffs' claims are typical of those of the proposed class because all members are subject to the same probation policy and suffer the same types of constitutional injuries.

68. Plaintiffs will fairly and adequately represent the interests of the proposed class. Plaintiffs have no interests that are antagonistic to or in conflict with the class and are represented by experienced civil rights counsel.

69. Class certification is appropriate under Rule 23(b)(2) because Defendant has acted and refused to act on grounds generally applicable to the class, thereby making declaratory and injunctive relief appropriate with respect to the class as a whole.

COUNT I
Violation of the First Amendment

70. Plaintiffs reallege and incorporate by reference all preceding allegations as though fully set forth herein.

71. By policy and practice, the Maricopa County Adult Probation Department imposes categorical restrictions on Internet access for individuals on probation for sex offenses, regardless of offense conduct, supervision progress, or individualized risk assessment.

72. These restrictions include:

- a. Prohibiting access to all devices capable of connecting to the Internet;
- b. Denying access to job-related, educational, or medical resources hosted online;
- c. Banning the use of social media platforms, even for lawful expression, family communication, or religious practices;
- d. Restricting emergency access to digital services outside narrowly defined and inconsistently applied exceptions;
- e. Conditioning any access on special approval that is rarely granted and not subject to clear standards or timely review.

73. This policy constitutes an overly broad and unlawful prior restraint on speech and expression. It is not narrowly tailored to serve any compelling government interest.

74. The restriction chills protected expression under the First Amendment, including political participation, educational advancement, religious affiliation, family association, artistic creation, and access to public discourse.

75. The Department's blanket ban is not the least restrictive means of advancing any stated public safety interest and fails to account for less restrictive alternatives, such as monitored access, usage tracking, or limited-site permissions.

76. As a result, Plaintiffs and the proposed class are unlawfully denied access to essential platforms for communication, self-sufficiency, and reintegration into public life—rights protected under the First Amendment to the United States Constitution.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court:

- (a) issue an order certifying this action to proceed as a class pursuant to Fed. R. Civ. P. 23(b)(2);

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- (b) appoint the undersigned as class counsel pursuant to Fed. R. Civ. P. 23(g);
- (c) enter a declaratory judgment that Defendant’s policy is unconstitutional both on its face and as applied to Plaintiffs;
- (d) enter an injunction prohibiting the Department from continuing to enforce its unconstitutional policy;
- (e) enter judgment for reasonable attorney’s fees and costs incurred in bringing this action; and
- (f) grant Plaintiffs any other relief the Court deems appropriate.

COUNT II
Violation of the Fourteenth Amendment
Guarantee of Procedural Due Process

80. Plaintiffs reallege and incorporate by reference all preceding allegations as though fully set forth herein.

81. The Maricopa County Adult Probation Department enforces a policy that categorically restricts Internet and computer access for individuals on probation for sex offenses, without individualized findings, written justifications, or any standardized review mechanism.

82. The policy contains no objective criteria, published standards, or clear process by which a probationer may request Internet access, appeal a denial, or obtain reconsideration based on progress or changed circumstances.

83. Requests for access are routinely denied with vague rationales such as “not appropriate at this time,” without any written notice, hearing opportunity, or timeline for future evaluation.

1 84. There is no designated decisionmaker, appeals process, or procedural safeguard to
2 prevent arbitrary enforcement. Approval is discretionary, opaque, and non-reviewable—
3 leaving individuals without any clear path to challenge the restriction.

4 85. As a result, Department’s policy operates in an arbitrary and capricious manner.

5
6 86. These actions violate the Due Process Clause of the Fourteenth Amendment to the
7 United States Constitution, both facially and as applied.

8 WHEREFORE, Plaintiffs respectfully request that this Honorable Court:

9 (a) issue an order certifying this action to proceed as a class pursuant to Fed. R.
10 Civ. P. 23(b)(2);

11 (b) appoint the undersigned as class counsel pursuant to Fed. R. Civ. P. 23(g);

12 (c) enter a declaratory judgment that Defendant’s policy is unconstitutional both
13 on its face and as applied to Plaintiffs;

14 (d) enter an injunction prohibiting the Department from continuing to enforce its
15 unconstitutional policy;

16 (e) enter judgment for reasonable attorney’s fees and costs incurred in bringing
17 this action; and

18 (f) grant Plaintiffs any other relief the Court deems appropriate.

19
20 DATED this 26th day of January, 2026.

21 Respectfully submitted,

22 /s/ Mark Weinberg

23 /s/ Adele D. Nicholas

24 /s/ Samantha DuMond
Counsel for Plaintiffs

1 Samantha DuMond
2 **DuMond Law Firm, PLLC**
3 340 E Palm Lane, Suite A100
4 Phoenix, AZ 85004
5 P: 602-803-4975
6 E: Samantha@DuMondLawAZ.com

7 Mark G. Weinberg
8 **LAW OFFICE OF MARK G. WEINBERG**
9 3612 N. Tripp Avenue
10 Chicago, Illinois 60641
11 Telephone: (773) 283-3913
12 Email: MWeinberg@sbcglobal.net
13 (*Pro Hac Vice forthcoming*)

14 Adele D. Nicholas
15 **LAW OFFICE OF ADELE D. NICHOLAS**
16 5707 W. Goodman Street
17 Chicago, Illinois 60630
18 Telephone: (847) 361-3869
19 Email: Adele@civilrightschicago.com
20 (*Pro Hac Vice forthcoming*)
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