

DOCKETED

NOV 29 2004

**IN THE UNITED STATES DISTRICT COURT
FOR NORTHERN DISTRICT OF ILLINOIS,
EASTERN DIVISION**

JUDGE PLUNKETT

THOMAS BURNS and MARK LARSEN,
individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

FIRST AMERICAN BANK,

Defendant.

04C 7682

Case No.:

MAGISTRATE JUDGE LEVIN

CLASS ACTION COMPLAINT

Introduction

1. Plaintiffs THOMAS BURNS ("Burns") and MARK LARSEN ("Larsen") bring this action, individually and on behalf of all others similarly situated, against Defendant FIRST AMERICAN BANK ("First American"), and allege violations of 15 U.S.C. § 1693 *et seq.* which is commonly known as the Electronic Funds Transfer Act (the "Act") and 12 C.F.R. 205 *et seq.*, commonly known as Regulation E, which contains regulations promulgated by the Board of Governors of the Federal Reserve System to implement the Act (the Act and Regulation E shall hereinafter be collectively referred to as "EFTA").

2. EFTA provides for, among other things, the timing and substance of specified disclosures to be given by operators of ATMs to users of ATMs.

3. 15 U.S.C. § 1693b(d)(3)(A), and its implementing regulation, 12 CFR Part 205.16(b), require an ATM operator who imposes a fee on a consumer for "host transfer services" (an electronic fund transfer or balance inquiry) to provide to the consumer, at the time

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U.S. DISTRICT COURT
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1-1

the service is provided, accurate notice of: (i) the fact that a fee is imposed by such operator for providing the service; and (ii) the amount of any such fee.

4. 15 U.S.C. § 1693b(d)(3)(B)(i), and its implementing regulation, 12 CFR Part 205.16(c)(1), provide that the notice required under § 1693b(d)(3)(A) and 12 CFR 205.16(b), with respect to any fee described therein, shall appear on the machine.

5. 15 U.S.C. § 1693b(d)(3)(B)(i) states:

(B) Notice requirements

(i) On the machine. The notice required under clause (i) of subparagraph (A) with respect to any fee described in such subparagraph **shall be posted in a prominent and conspicuous location on or at the automated teller machine at which the electronic fund transfer is initiated by the consumer.**

(Emphasis added)

6. Implementing regulation, 12 CFR Part 205.16(c)(1) states that in order to comply an automated teller machine operator must:

(1) On the machine. Post the notice required by paragraph (b)(1) of this section in a prominent and conspicuous location on or at the automated teller machine;

(Emphasis added.)

7. 15 U.S.C. § 1693b(d)(3)(C), and its implementing regulation, 12 CFR Part 205.16(e), provide that no fee may be imposed by an ATM operator in connection with any electronic fund transfer initiated by a consumer for which a notice is required unless the consumer receives such notice in accordance with the foregoing statutes and regulations.

8. Specifically, 15 U.S.C. § 1693b(d)(3)(C) states in relevant part:

(C) Prohibition on fees not properly disclosed and explicitly assumed by consumer **No fee may be imposed** by any automated teller machine operator in connection with any electronic fund transfer initiated by a consumer for which a notice is required

under subparagraph (A), **unless** — (i) the consumer receives such notice in accordance with subparagraph (B)

(Emphasis added.)

9. This case is brought under the EFTA based upon the fact that the Defendant imposed a fee without providing in a prominent and conspicuous manner an accurate notice as required under the Act.

Jurisdiction and Venue

10. This Court has federal question jurisdiction pursuant to 28 U.S.C. § 1331 because this action arises under the Electronic Fund Transfers Act, 15 U.S.C. § 1693 *et seq.* and the implementing Federal Reserve Board Regulation E, 12 C.F.R. Part 205.

11. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b), as the acts and transactions that give rise to this action occurred, in substantial part, in this district. In addition, Plaintiffs reside in this district and Defendant transacts business in this district.

The Parties

12. Burns is a citizen of the State of Illinois who resides in this district.

13. Larsen is a citizen of the State of Illinois who resides in this district.

14. First American Bank is a federally chartered bank doing business in this district.

15. First American Bank is a Automated teller machine operator, as that term is defined by § 205.16(a), which states: Automated teller machine operator means any person that operates an automated teller machine at which a consumer initiates an electronic fund transfer or a balance inquiry and that does not hold the account to or from which the transfer is made, or about which an inquiry is made.

Facts Related to Thomas Burns

16. On or about September 16, 2003, Burns was in the Chicago Hilton and Towers Hotel and used an automated teller machine, ("ATM"), machine number S1A5260, located in the hotel lobby, to withdraw money.

17. At the time Burns used the ATM, the owner and operator of the ATM was First American Bank.

18. At the time Burns used the ATM, the notice on the outside of machine number S1A5260 stated: "the owner of the terminal, First American Bank, charges a fee to U.S. cardholders of \$2.00 for withdrawing cash if the transaction is performed using a card that was not issued by First American Bank." At the time Burns withdrew money from ATM S1A5260, machine number S1A5261 located near it also had the same incorrect notice on it. On information and belief, both notices on machine number S1A5260 and machine number S1A5261 were placed upon the machines by First American Bank.

19. Upon investigation, the notice on the outside of machine number S1A5260 is not accurate, in that the actual fee charged is not \$2.00 as stated on the notice posted on the outside of the machine, but \$2.50, as demonstrated by Exhibit A.

20. At the time Burns used the ATM number S1A5260, he was charged \$2.50 as demonstrated by Exhibit B.

21. Burns again used ATM number S1A5260 on November 23, 2004, and although the notice posted on the outside of the machine represented the transaction fee would be \$2.00, he was again charged \$2.50, as demonstrated by Exhibit B.

Facts Related to Mark Larsen

22. On or about August 16, 2004, Larsen was in the Chicago Hilton and Towers Hotel and used an ATM machine, number S1A5261, located in the hotel lobby to withdraw money. This machine is located near to ATM machine number S1A5260.

23. At the time Larsen used the ATM, the owner and operator of the ATM was First American Bank.

24. At the time Larsen used the ATM, the notice on the outside of machine number S1A5261 stated: "the owner of the terminal, First American Bank, charges a fee to U.S. cardholders of \$2.00 for withdrawing cash if the transaction is performed using a card that was not issued by First American Bank." At the time Larsen withdrew money from ATM S1A5261, machine number S1A5260 located near it also had the same incorrect notice on it. On information and belief, both notices on machine number S1A5260 and machine number S1A5261 were placed upon the machines by First American Bank.

25. Upon investigation, the notice on the outside of machine number S1A5261 is not accurate, in that the actual fee charged is not \$2.00 as stated on the notice posted on the outside of the machine, but \$2.50, as demonstrated by Exhibit C.

26. At the time Larsen used ATM number S1A5261, he was charged \$2.50 as demonstrated by Exhibit D.

Others have been assessed the \$2.50 fee and continue to be assessed the \$2.50 fee

27. Defendant is the automated teller machine operator for the ATMs, numbers S1A5260 and S1A5261, which are at issue in this case.

28. Numerous other customers have been charged the ATM fee at issue. Attached as Exhibit E are copies of other customer ATM receipts demonstrating the fee at issue having been charged by the Defendant.

29. During the period between September 16, 2003 and August 16, 2004, the two ATM machines incorrectly disclosed a fee for the use of the ATMs as \$2.00 instead of \$2.50.

30. After August 16, 2004, until a date better known by the Defendant, the two ATM machines incorrectly disclosed a fee for the use of the ATMs as \$2.00 instead of \$2.50.

31. On information and belief, since August 16, 2004 through to the present filing date of this complaint, First American Bank has assessed hundreds of \$2.50 transaction fees though the use of its ATMs, numbers S1A5260 and S1A5261, located in the Chicago Hilton.

32. On information and belief, since August 16, 2004 through to the present filing date of this complaint, First American Bank has not updated or changed its notice posted on the outside of its ATMs, numbers S1A5260 and S1A5261, located in the Chicago Hilton.

33. On information and belief, First American Bank owns and operates the ATM and other similar automated teller machines which also incorrectly disclose the amount of the charges actually assessed to customers.

COUNT I
Violation of 15 U.S.C. § 1693 *et seq.*
and 12 CFR 205 *et seq.*

34. Plaintiffs reallege the allegations contained in paragraphs 1 through 33 of this Complaint.

35. Plaintiffs bring this action against Defendant on behalf of themselves and a national class of similarly situated persons who: 1) were charged a "transaction fee" for the use of ATMs, numbers S1A5260 and S1A5261, located in the Hilton at 720 South Michigan Avenue

in Chicago, Illinois; 2) in an amount different from the “transaction fee” disclosed on the notice posted on the outside of the ATMs, number S1A5260 and S1A5261, located in the Hilton at 720 South Michigan Avenue in Chicago, Illinois.

Class Action Allegations

36. Under Rule 23 of the Federal Rules of Civil Procedure, a class action is appropriate and preferable in this action because the class consists of thousands of persons and is so numerous that joinder of all members, whether otherwise required or permitted, is impracticable. Plaintiffs do not know of the approximate number of class members because such information is in the exclusive control of Defendants.

37. Under Rule 23 of the Federal Rules of Civil Procedure, a class action is appropriate and preferable in this action because there are questions of law and fact common to the class that predominate over any questions affecting only individual class members, including:

- (a) Whether under 15 U.S.C. § 1693b(d)(3)(A) and 12 CFR 205.16 the Defendant was, at all relevant times during the class period, an automated teller machine operator who imposed a fee on consumers for providing host transfer services to those consumers; and
- (b) Whether Defendant complied, at all relevant times during the class period, with the notice requirements of 15 U.S.C. § 1693b(d)(3)(B) and 12 CFR 205.16.

38. Under Rule 23 of the Federal Rules of Civil Procedure, a class action is appropriate and preferable in this action because the Plaintiffs’ claims are typical of the claims of the proposed class. The facts that show the claims advanced by Plaintiffs are typical of the claims of each member of the class are as follows:

- (a) Plaintiffs and all members of the proposed class used a First American-operated ATM.
- (b) To the extent those ATMs did not properly provide notice as required by the express language of 15 U.S.C. § 1693b(d)(3)(B) and 12 CFR 205.16,

the fee would be unauthorized and subject to disgorgement, making the circumstances of the class members typical to those of Plaintiffs.

39. Under Rule 23 of the Federal Rules of Civil Procedure, a class action is appropriate and preferable in this action because the Plaintiffs have hired counsel able and experienced in class action litigation and because the Plaintiffs themselves will fairly and adequately protect the interests of the class.

40. Certification is appropriate under Rule 23(b)(3) of the Federal Rules of Civil Procedure because questions of law or fact common to the members of the class predominate over any questions affecting only individual members, and a class action is superior to other available methods for the full and efficient adjudication of the controversy.

41. Certification is appropriate under Rule 23(b)(3) of the Federal Rules of Civil Procedure because there would be enormous economies to the court and the parties in litigating the common issues on a class-wide basis instead of a repetitive individual basis.

42. Certification is appropriate under Rule 23(b)(3) of the Federal Rules of Civil Procedure because the size of each proposed class member's claim for actual damages is too small to make individual litigation an economically viable alternative.

43. Certification is appropriate under Rule 23(b)(3) of the Federal Rules of Civil Procedure because class treatment is desirable for optimal deterrent effect, compensation for wrongdoing, and for limiting court-awarded reasonable legal expenses incurred.

44. Certification is appropriate under Rule 23(b)(3) of the Federal Rules of Civil Procedure because, despite the relatively small size of the individual claims, their aggregate value, coupled with the economies of scale inherent in litigating similar claims on a common basis, will enable this case to be litigated as a class action on a cost-effective basis, especially when compared with repetitive individual litigation.

45. Certification is appropriate under Rule 23(b)(3) of the Federal Rules of Civil Procedure because no unusual difficulties will likely be encountered in the management of this class in that all questions of law or fact to be litigated at the liability stage are common to the class and all compensatory relief issues are concomitant with the liability finding and can be calculated by automated and objective means.

Substantive Violation

46. 15 U.S.C. § 1693b(d)(3)(A) provides that any automated teller machine operator who imposes a fee on any consumer for providing host transfer services to such consumer must provide notice in accordance with subparagraph (B) of that section to the consumer (at the time the service is provided) of:

- (i) the fact that a fee is imposed by such operator for providing the service; and
- (ii) the amount of any such fee.

47. Subparagraph (B) of 15 U.S.C. § 1693b(d)(3) provides in relevant part as follows:

- (B) Notice Requirements.
 - (i) On the machine. The notice required under clause (i) of subparagraph (A) with respect to any fee described in such subparagraph shall be posted in a prominent and conspicuous location on or at the automated teller machine at which the electronic fund transfer is initiated by the consumer.

48. Subparagraph (C) of § 1693b(d)(3) provides as follows:

- (C) Prohibition on fees not properly disclosed and explicitly assumed by consumer. **No fee may be imposed** by any automated teller machine operator in connection with any electronic fund transfer initiated by a consumer for which a notice is required under subparagraph (A), **unless**:
 - (i) **the consumer receives such notice in accordance with subparagraph (B)**; and (ii) the consumer elects to continue in the manner necessary to effect the transaction after receiving such notice.

(Emphasis added)

49. 12 CFR Part 205.16(b) reads as follows:

(b) General. An automated teller machine operator that imposes a fee on a consumer for initiating an electronic fund transfer or a balance inquiry shall:

(1) Provide notice that a fee will be imposed for providing electronic fund transfer services or a balance inquiry; and

(2) Disclose the amount of the fee.

50. 12 CFR Part 205.16(c) reads in relevant part as follows:

(c) Notice requirement. An automated teller machine operator must comply with the following:

(1) On the machine. Post the notice required by paragraph (b)(1) of this section in a prominent and conspicuous location on or at the automated teller machine;

51. 12 CFR Part 205.16(e) reads as follows:

(e) Imposition of fee. An automated teller machine operator may impose a fee on a consumer for initiating an electronic fund transfer or a balance inquiry only if

(1) The consumer is provided the notices required under paragraph (c) of this section, and

(2) The consumer elects to continue the transaction or inquiry after receiving such notices.

52. Under EFTA and Regulation E, Defendant is an automated teller machine operator who provided host transfer services at all relevant times to this action.

53. Defendant failed to comply with the notice requirements of EFTA and Regulation E in connection with providing such services to Plaintiffs and all proposed class members.

54. Under EFTA and Regulation E, Defendant was prohibited from imposing any fee for providing host transfer services because Defendant failed to provide the proper notice required under EFTA and Regulation E.

55. Plaintiffs and all proposed class members have suffered damages as a result of Defendant's violations of EFTA and Regulation E in that they were charged a fee that was not properly disclosed in compliance with the EFTA and Regulation E.

56. 15 U.S.C. § 1693m provides that Defendant shall be liable to Plaintiffs and all proposed class members for violations of 15 U.S.C. § 1693 *et seq.* in the amount of actual damages incurred, statutory damages, and the costs of bringing this action, together with reasonable attorneys' fees as determined by the court.

57. In this case, the entire amount of the improperly disclosed transaction fees charged to the class should be disgorged, the value of which can be easily determined by a ministerial review of the Defendant's records.

WHEREFORE, Plaintiffs and the proposed class members respectfully request that this Court grant the following relief:

- (A) Enter a judgment declaring that the acts and practices of Defendant complained of herein are in violation of EFTA and Regulation E;
- (B) Enjoin Defendant from continuing to charge a fee for the use of ATMs without notification, as required by the EFTA and Regulation E, by requiring the Defendant to immediately check all ATMs it currently uses and correcting the signage;
- (C) Award damages to Plaintiffs and the class members as set forth in EFTA and Regulation E;
- (D) Award Plaintiffs all their reasonable costs and fees in bringing this action; and
- (E) Grant Plaintiffs and the class members such other and further relief as this Court finds just and proper.

Respectfully submitted,

By: 
One of Plaintiffs' Attorneys

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Fax: (312) 377-9930

**GROUP
EXHIBIT
A**

Cards

STAR

FIRST AMERICAN BANK

DATE 08/15/04 TIME 13:35 TERM \$1A5260

CARD ID # 5026
720 S MICHIGAN AVE
CHICAGO IL

TRAN H9090	\$100.00
WITHDRAWAL	
FROM CHECKING	
ACCESS FEE	\$2.50
TOTAL	\$102.50
CURRENT BAL	
AVAIL	\$2070.25

For more information and to learn about our products visit our website: www.firstambank.com



020039

FEE NOTICE

The owner of the First American Bank of Chicago, Illinois, is First American Bank of Chicago, Illinois.

U.S. Federal Reserve Bank of Chicago, Illinois, is the issuer of the First American Bank of Chicago, Illinois.

U.S. Federal Reserve Bank of Chicago, Illinois, is the issuer of the First American Bank of Chicago, Illinois.

U.S. Federal Reserve Bank of Chicago, Illinois, is the issuer of the First American Bank of Chicago, Illinois.

08/15/2004

FIRST
AMERICAN
BANK

DATE 08/15/04 TIME 13:35 TERM S1AS260

CARD ID # 5026
720 S MICHIGAN AVE
CHICAGO IL

TRAN #9090
WITHDRAWAL \$100.00
FROM CHECKING
ACCESS FEE \$2.50
TOTAL \$102.50
CURRENT BAL \$2070.25
AVAIL BNL

08/15/2004



**GROUP
EXHIBIT
B**

DATE TIME TERM
09/16/03 22:36 S1A5260

CARD ID # 0488
720 S MICHIGAN AVE
CHICAGO IL

TRAN #9253	
WITHDRAWAL	\$20.00
FROM CHECKING	
ACCESS FEE	\$2.50
TOTAL	\$22.50
CURRENT BAL	\$561.25
AVAIL BAL	\$561.25

Tom Burns

FIRST AMERICAN BANK

DATE TIME TERM
11/23/04 14:31 S1A5260

CARD ID # 4206
720 S MICHIGAN AVE
CHICAGO IL

TRAN #8913	
WITHDRAWAL	\$100.00
FROM CHECKING	
ACCESS FEE	\$2.50
TOTAL	\$102.50
CURRENT BAL	\$922.68
AVAIL BAL	\$799.68

For a list of locations and to learn about our products
and services, visit our website, www.firstambank.com

Thank You!



G20020

**GROUP
EXHIBIT
C**

**FIRST
AMERICAN
BANK**

Card

ALL TIME NEW
 41504 18331 5185261
 CARD ID # 5026
 720 > MICHIGAN AVE
 CHICAGO IL 60611

TRAN #1859
 WITHDRAWAL \$100.00
 FROM CHECKING
 ACCESS FEE \$2.50
 101AL \$102.50
 CURRENT BAL
 AVAIL \$2172.75

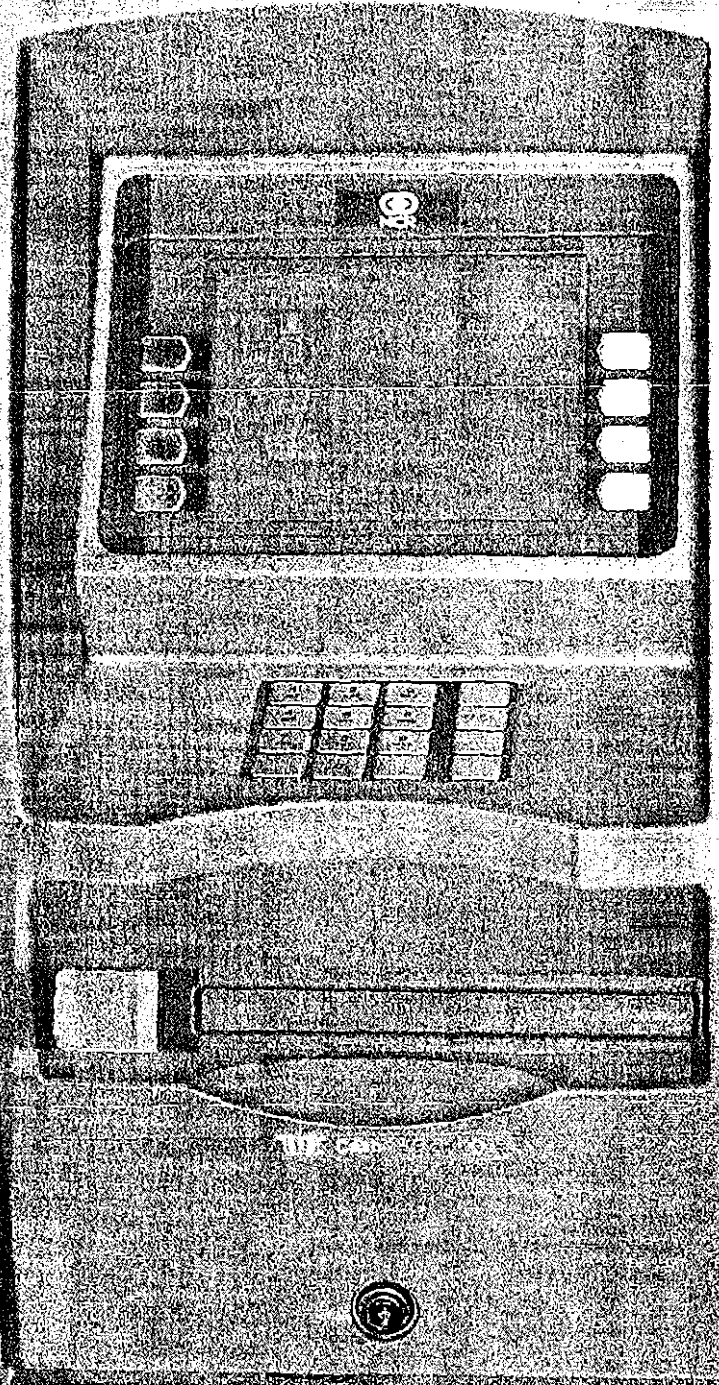


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 and services apply. Visit www.firstam.com
 or call 1-800-368-3683 for more information.

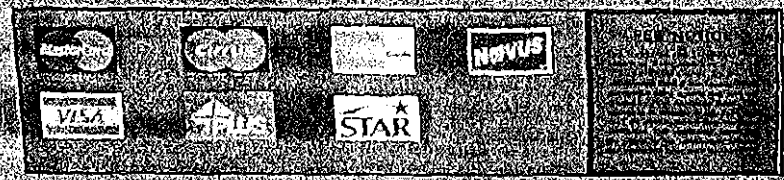
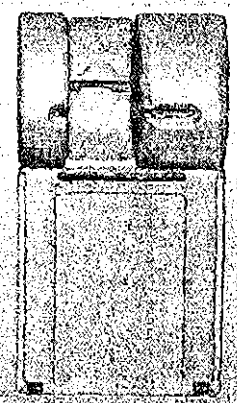


FEE NOTICE
 THE OVERSEAS NATIONAL BANK OF
 AMERICA, BANK OF AMERICA
 U.S. SAVINGS

08/15/2004



521



08/15/

EXHIBIT

D

FIRST AMERICAN BANK

DATE 08/16/04 TIME 13:56 TERM
S1A5261

CARD ID # 6213
720 S MICHIGAN AVE
CHICAGO IL

TRAN #7494	\$100.00
WITHDRAWAL	
FROM CHECKING	\$2.50
ACCESS FEE	\$102.50
TOTAL	
CURRENT BAL	\$661.21
AVAIL BAL	

For a list of locations and to learn about our products and services, visit our website, www.firstambank.com



620020

Thank You!

MARK LARSON

EXHIBIT

E

DATE 09/16/03 TIME 15:13 TERM S1A5261

CARD ID # 6931
720 S MICHIGAN AVE
CHICAGO IL

TRAN #8355
WITHDRAWAL \$60.00
FROM CHECKING
ACCESS FEE \$2.50
TOTAL \$62.50
CURRENT BAL \$19.32
AVAIL BAL \$19.32

DATE 09/16/03 TIME 16:18 TERM S1A5261

CARD ID # 5584
720 S MICHIGAN AVE
CHICAGO IL

TRAN #8363
WITHDRAWAL \$80.00
FROM SAVINGS
ACCESS FEE \$2.50
TOTAL \$82.50
CURRENT BAL \$1319.52
AVAIL BAL \$1319.52

DATE 09/16/03 TIME 15:13 TERM S1A5261

CARD ID # 6931
720 S MICHIGAN AVE
CHICAGO IL

TRAN #8355
WITHDRAWAL \$60.00
FROM CHECKING
ACCESS FEE \$2.50
TOTAL \$62.50
CURRENT BAL \$19.32
AVAIL BAL \$19.32

DATE 09/16/03 TIME 16:18 TERM S1A5261

CARD ID # 5584
720 S MICHIGAN AVE
CHICAGO IL

TRAN #8363
WITHDRAWAL \$80.00
FROM SAVINGS
ACCESS FEE \$2.50
TOTAL \$82.50
CURRENT BAL \$1319.52
AVAIL BAL \$1319.52

Other member's fees

JUDGE PLUNKETT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

04C 7682

Civil Cover Sheet

MAGISTRATE JUDGE LEVIN

This automated JS-44 conforms generally to the manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is authorized for use only in the Northern District of Illinois.

Plaintiff(s): Thomas Burns and Mark Larsen	Defendant(s): First American Bank
County of Residence: Cook	County of Residence:
Plaintiff's Atty: The Consumer Advocacy Center, P.C. 180 W. Washington, Suite 700 Chicago, IL 60602 (312) 782-5808	Defendant's Atty:

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II. Basis of Jurisdiction: **3. Federal Question (U.S. not a party)**

III. Citizenship of Principal Parties (Diversity Cases Only)

Plaintiff:- N/A
Defendant:- N/A

IV. Origin : **1. Original Proceeding**

V. Nature of Suit: **370 Other Fraud**

VI. Cause of Action: **15 U.S.C. §§ 1693 et seq, Electronic Funds Transfer Act**

VII. Requested in Complaint

Class Action: **Yes**
Dollar Demand:
Jury Demand: **No**

VIII. This case IS NOT a refiling of a previously dismissed case.

Signature: _____

Date: 11-29-04

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CLERK
U.S. DISTRICT COURT

If any of this information is incorrect, please go back to the Civil Cover Sheet Input form using the *Back* button in your browser and change it. Once correct, print this form, sign and date it and submit it with your new civil action. **Note: You may need to adjust the font size in your browser display to make the form print properly.**

Revised: 06/28/00

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

JUDGE PLUNKETT
MAGISTRATE JUDGE LEVIN

In the Matter of

EASTERN DIVISION

Thomas Burns and Mark Larsen
v.
First American Bank

04C 7682
DOCKETED
Case Number:
NOV 29 2004

U.S. DISTRICT COURT
CLERK
2004 NOV 29 AM 10:52
FILED-PM

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR
Plaintiff

(A)		(B)	
SIGNATURE <i>Brian Bromberg by SB</i>		SIGNATURE <i>Lance A. Raphael</i>	
NAME Brian L. Bromberg		NAME Lance A. Raphael	
FIRM Brian L. Bromberg, P.C.		FIRM The Consumer Advocacy Center, P.C.	
STREET ADDRESS 40 Exchange Place, Suite 2010		STREET ADDRESS 180 W. Washington, Suite 700	
CITY/STATE/ZIP New York, NY 10005		CITY/STATE/ZIP Chicago, IL 60602	
TELEPHONE NUMBER (212) 248-7906	FAX NUMBER (212) 248-7908	TELEPHONE NUMBER (312) 782-5808	FAX NUMBER (312) 377-9930
E-MAIL ADDRESS brian@brianbromberg.com		E-MAIL ADDRESS lar@caclawyers.com	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 90785668		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6216730	
MEMBER OF TRIAL BAR?	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	MEMBER OF TRIAL BAR?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
TRIAL ATTORNEY?	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	TRIAL ATTORNEY?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
		DESIGNATED AS LOCAL COUNSEL?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
(C)		(D)	
SIGNATURE <i>Stacy M. Bardo</i>		SIGNATURE <i>Allison A. Krumhorn</i>	
NAME Stacy M. Bardo		NAME Allison A. Krumhorn	
FIRM The Consumer Advocacy Center, P.C.		FIRM The Consumer Advocacy Center, P.C.	
STREET ADDRESS 180 W. Washington, Suite 700		STREET ADDRESS 180 W. Washington, Suite 700	
CITY/STATE/ZIP Chicago, IL 60602		CITY/STATE/ZIP Chicago, IL 60602	
TELEPHONE NUMBER (312) 782-5808	FAX NUMBER (312) 377-9930	TELEPHONE NUMBER (312) 782-5808	FAX NUMBER (312) 377-9930
E-MAIL ADDRESS stacy@caclawyers.com		E-MAIL ADDRESS allison@caclawyers.com	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6271913		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6277823	
MEMBER OF TRIAL BAR?	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	MEMBER OF TRIAL BAR?	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
TRIAL ATTORNEY?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	TRIAL ATTORNEY?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
DESIGNATED AS LOCAL COUNSEL?	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	DESIGNATED AS LOCAL COUNSEL?	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>