

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

MICHAEL L. SHAKMAN and PAUL M. LURIE, et al., Plaintiffs,)	
)	Case No. 69 C 2145
v.)	
)	
DEMOCRATIC ORGANIZATION OF COOK COUNTY, et al., Defendants.)	Sidney I. Schenkier United States Magistrate Judge
)	

AFFIDAVIT OF NOELLE BRENNAN PURSUANT TO FED. R. CIV. P. 53

1. I am a member of the Illinois bar and an owner/shareholder of Noelle Brennan & Associates, Ltd. I submit this affidavit pursuant to Fed. R. Civ. P. 53(a)(2) and 53(b)(3)(A).

2. Pursuant to the Court's order of October 24, 2014, naming me as a Special Master for the purposes described by the Court on October 22, 2014, I hereby submit this affidavit.

3. After an internal review, I have determined that I have no conflict pursuant to 28 U.S. § 455(a) or (b) which would cause me to disqualify myself from this proceeding.

4. While the following does not represent a conflict, I further state as follows:

a) My husband Craig Varga, an attorney in private practice not affiliated with my firm in any manner, is a long-time law school friend of Michael Forti, who has served as Chief Counsel for Illinois Department of Transportation ("IDOT") since December 17, 2012. Beginning at a time prior to our marriage, my husband and Mr. Forti were both part of a group-

ownership vacation property in Michigan. I was never an owner in that property. My husband's ownership as part of the group and in the property ended in March of 2008.

b) Beginning in late 2011 and ending in March of 2012, before Mr. Forti joined IDOT, my husband was one of several dozen supporters of Mr. Forti's candidacy for a Cook County Judge position. In that capacity he hosted a fundraiser for Mr. Forti. Because Mr. Forti was then an employee of the City of Chicago, I took no public position on his candidacy.

5. Pursuant to 28 U.S.C. §1746, I state under penalty of perjury that the foregoing statements are true and correct.

Dated:

November 14, 2014

s/ Noelle Brennan

Noelle Brennan & Associates, Ltd.
20 South Clark, Suite 1530
Chicago, Illinois 60614
(312) 422-0001

CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2014, I filed the foregoing **AFFIDAVIT OF NOELLE BRENNAN PURSUANT TO FED. R. CIV. P. 53** with the Clerk of the Court using the CM/ECF system which will provide notification of such filing to the e-mail addresses of all counsel or record.

RESPECTFULLY SUBMITTED,

/s/ Noelle C. Brennan
One of Plaintiff's Attorneys