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STATE OF ILLINOIS )  
 ) SS.  
COUNTY OF WILL )

**IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT  
WILL COUNTY, ILLINOIS**

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
 vs. ) NO. 09 CF 1048  
 )  
DREW PETERSON )  
 )

*James W. Glasgow*  
CLERK, CIRCUIT COURT  
WILL COUNTY, ILLINOIS

2009 MAY 27 PM 2:43

FILED

**MOTION TO AMEND DEFENDANT'S CONTACT ORDER**

Now come the People of the State of Illinois by JAMES W. GLASGOW, State's Attorney of Will County, Illinois, through Nicole L. Moore, Assistant State's Attorney, and respectfully move this Honorable Court to Amend the Contact Order that was entered by Chief Judge Kinney on May 18, 2009. In support thereof, the People state as follows:

1. That on May 18, 2009, Chief Judge Kinney entered an order for Joel Brodsky, Reem H. Odeh, Andrew Abood, Timothy McCarthy, Clinton Charles Van Nocker and John Paul Carroll to have personal contact visits with defendant in the Will County Adult Detention Facility on a daily basis.

2. That Chief Judge Kinney stated upon signing defendant's order that "I'll enter the order as proposed. If there's some issues with the jail staff and, you know, how often this contact occurs and it creates a problem, the State would have to bring it to the attention of the Court and it would be subject to being modified or addressed further as this case goes on."

3. The State is asking to modify the contact order entered on May 18, 2009 as it singles out Drew Peterson for preferential treatment as opposed to other inmates at the Will County Adult Detention Facility and in doing so imposes additional burdens on the jail staff.

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3. In addition, on May 24, 2009, defense attorney Joel Brodsky came to the Will County Adult Detention Facility at approximately 1:10 p.m. for a contact visit with defendant. At 1:20 p.m. defense attorney Brodsky began playing a card game with defendant during that contact visit.

4. It is the position of the State that a card game is not an appropriate use of the contact order and is respectfully requesting this Court to further amend the order that a contact visit shall be for the sole purpose of speaking to the defendant about the charges before the Court.

5. Defense counsel should utilize the jail video conference system for visitation unless some specific need for contact arises, and then should schedule the contact visit at least one day in advance and notify jail personnel of the number of attorneys and non-attorney personnel attending and the time period of the visit.

WHEREFORE, the People of the State of Illinois respectfully move this Honorable Court to amend the defense contact visit order to require specificity or a schedule as set forth above.

Respectfully submitted,

JAMES W. BLASGOW  
State's Attorney  
Will County, Illinois



Nicole L. Moore  
Assistant State's Attorney

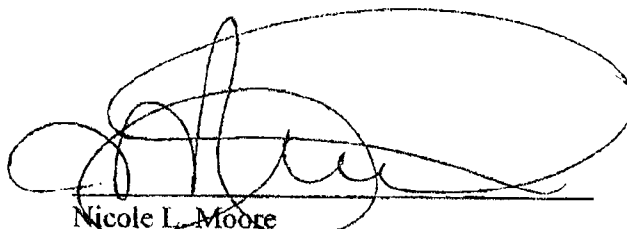
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STATE OF ILLINOIS )  
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**AFFIDAVIT**

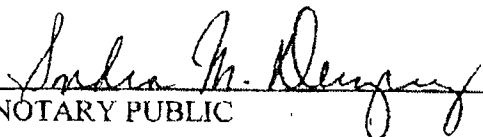
Nicole L. Moore, Assistant State's Attorney, being first duly sworn on oath, deposes and says that she has read the foregoing and knows the contents thereof, and that the same is true to the best of her knowledge.



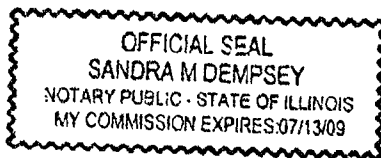
Nicole L. Moore  
Assistant State's Attorney

Subscribed and sworn to before me

this May 27, 2009



NOTARY PUBLIC



NLM/ nmm