BEFORE THE HEARING BOARD
OF THE
ILLINOIS ATTORNEY REGISTRATION
AND
DISCIPLINARY COMMISSION

In the Matter of:	)	
	)	
TRYGVE THOMAS MEADE,	)	
	)	Commission No. 2023PR00015
Attorney-Respondent,	)	
	)	
No. 6313478.	)	

NOTICE OF FILING

TO: David B. Collins
Counsel for the Administrator
Email: ARDCeService@iardc.org; dcollings@iardc.org

PLEASE TAKE NOTICE that on May 8, 2023, I will submit the attached ANSWER and this notice to the Clerk of the Attorney Registration and Disciplinary Commission, One Prudential Plaza, 130 East Randolph, Suite 1500, Chicago, Illinois 60601, for filing by electronic means through the Odyssey eFileIL system.

/s/William F. Moran, III
Counsel for Respondent

COUNSEL FOR RESPONDENT:

William F. Moran, III (#06191183)
STRATTON, MORAN, REICHERT,
SRONCE & APPLETON
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PROOF OF SERVICE

I, William F. Moran, III, state that I served copies of this Notice of Filing and the attached Answer on Counsel for the Administrator by emailing true and correct copies thereof to him at the email addresses shown on the face of this Notice of Filing on this 8th day of May 2023. Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, 735 ILCS 5/1-109, the undersigned certifies that the statements set forth in this instrument are true and correct.

/s/William F. Moran, III
Counsel for Respondent

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ANSWER

Respondent, TRYGVE THOMAS MEADE, by his attorney, William F. Moran, III, pursuant to Commission Rule 231, for his answer to the Complaint filed against him in this cause by the Administrator of the Attorney Registration and Disciplinary Commission, JEROME LARKIN, states as follows:

Respondent's Professional Background

1. Respondent was admitted to the practice of law in the State of Illinois on October 31, 2013. He is not licensed to practice in any other state, but is licensed to practice under his present name before the United States District Court for the Central District of Illinois.

2. Respondent does not have any other professional license or certificate.

COUNT I

(Making False Statements to a Tribunal-Knox County Consolidated Cases)

1. At all times alleged in this count, Respondent was the principal attorney at Meade Law Office, P.C. in Canton, Illinois.

ANSWER: Respondent admits the allegation as set forth in Paragraph 1 of Count I of the Administrator's Complaint.

2. On or about August 12, 2021, Respondent agreed to represent Tonny J. Williamson ("Tonny") and her sister, Penny J. Williamson ("Penny") (collectively "the Williamsons") in two on-going cases pending in Knox County, *In the matter of Frederick Stegall, an Alleged Disabled Person*, case number 21-PP-0010 consolidated with *Frederick J. Stegall, Galesburg Rifle Club, an Illinois not-for-profit Corporation, and the Catholic Diocese of Peoria, an Illinois Religious Corporation, Plaintiffs vs. Tonny J. Williamson and Penny J. Williamson, Defendants*, case number 21-MR-21 ("consolidated cases").

ANSWER: Respondent admits the allegations as set forth in Paragraph 2 of Count I of the Administrator's Complaint.

3. The representation agreement required the Williamsons to pay Respondent a security retainer of $10,000. Respondent was to bill the Williamsons on an hourly basis and send Tonny itemized monthly invoices for legal services and expenses.

ANSWER: Respondent admits the allegations as set forth in Paragraph 3 of Count I of the Administrator's Complaint.

4. On October 1, 2021, Paul Mangieri ("Mangieri"), counsel representing Mr. Stegall in the consolidated cases, filed and served a notice scheduling the Williamsons' discovery depositions for November 4, 2021. The notice required the Williamsons to produce a number of documents at their depositions.

ANSWER: Respondent admits the allegations as set forth in Paragraph 4 of Count I of the

Administrator's Complaint.

5. Respondent did not communicate with the Williamsons regarding the November 4, 2021 depositions or the requested documents, nor did he meet with them in preparation for their depositions.

ANSWER: Respondent admits the allegations as set forth in Paragraph 5 of Count I of the Administrator's Complaint.

6. On the morning of November 4, 2021, shortly before Tonny's deposition was to begin, Respondent telephoned Mangieri to advise that a medical emergency involving Respondent's father had occurred. The depositions scheduled for that day were continued by agreement.

ANSWER: Respondent admits the allegations as set forth in Paragraph 6 of Count I of the Administrator's Complaint.

7. There was a court appearance in the consolidated cases on December 3, 2021. The attorneys of record, including Respondent, and the Williamsons personally appeared. Among the rulings made that day, the court orally ordered that the Williamsons appear and give their discovery depositions on December 9, 2021.

ANSWER: Respondent admits the allegations as set forth in Paragraph 7 of Count I of the Administrator's Complaint.

8. An agreed order regarding the court's rulings, including the setting of the Williamsons' discovery depositions, was circulated amongst and signed by the attorneys of record, including Respondent, and was entered on December 8, 2021.

ANSWER: Respondent admits the allegations as set forth in Paragraph 8 of Count I of the Administrator's Complaint.

9. Pursuant to the court's oral pronouncement, Mangieri filed and served, on December 3, 2021, a notice re-scheduling the Williamsons' discovery deposition for December 9, 2021. The notice required the Williamsons to produce a number of documents at their depositions.

ANSWER: Respondent admits the allegations as set forth in Paragraph 9 of Count I of the Administrator's Complaint.

10. On December 6, 2021, Respondent, on behalf of the Williamsons, filed a Motion to Certify Questions for Interlocutory Appeal in the consolidated cases.

ANSWER: Respondent admits the allegations as set forth in Paragraph 10 of Count I of the Administrator's Complaint.

11. Respondent did not communicate with the Williamsons regarding the requested documents, nor did he meet with them in preparation for their depositions.

ANSWER: Respondent admits the allegations as set forth in Paragraph 11 of Count I of the Administrator's Complaint.

12. On or about December 8, 2021, Respondent told the Williamsons that their depositions would not go forward on December 9, 2021, due to the filing of the Motion to Certify Questions for Interlocutory Appeal.

ANSWER: Respondent admits the allegations as set forth in Paragraph 12 of Count I of the Administrator's Complaint.

13. The Williamsons did not appear for their depositions on December 9, 2021.

ANSWER: Respondent admits the allegation as set forth in Paragraph 13 of Count I of the Administrator's Complaint.

14. On December 14, 2021, Mangieri, on behalf of Mr. Stegall, filed a verified Petition for Rule to Show Cause ("'petition") against the Williamsons regarding their failure to appear for their December 9, 2021 depositions. Plaintiffs Galesburg Gun Club and Catholic Diocese of Peoria, through their attorney, John Robertson, joined in the petition on December 15, 2021.

ANSWER: Respondent admits the allegations as set forth in Paragraph 14 of Count I of the Administrator's Complaint.

15. On January 10, 2022, the court conducted a hearing on the petition.

ANSWER: Respondent admits the allegation as set forth in Paragraph 15 of Count I of the Administrator's Complaint.

16. At the outset of the January 10, 2022 hearing, the court asked Respondent "Where are your clients?"

ANSWER: Respondent admits the allegation as set forth in Paragraph 16 of Count I of the Administrator's Complaint.

17. Respondent stated, "So neither of them were able to make it today, Judge. They're not feeling well."

ANSWER: Respondent admits the allegations as set forth in Paragraph 17 of Count I of the Administrator's Complaint.

18. Respondent's statement "So neither of them were able to make it today, Judge. They're not feeling well" was false because Respondent had not informed the Williamsons of the hearing; he had not communicated with them regarding the hearing and the reason why the Williamsons were not present was not due to their "not feeling well."

ANSWER: Respondent admits the allegations as set forth in Paragraph 18 of Count I of the Administrator's Complaint.

19. Respondent knew that his statement described in paragraph 17, above, was false at the time he made it.

ANSWER: Respondent admits the allegation as set forth in Paragraph 19 of Count I of the Administrator's Complaint.

20. On January 19, 2022, the court entered a Rule to Show Cause, ordering the Williamsons to appear in court on January 26, 2022 to show cause and to answer the allegations contained in the petition.

ANSWER: Respondent admits the allegations as set forth in Paragraph 20 of Count I of the Administrator's Complaint.

21. On January 26, 2022, the Williamsons appeared and testified at the Rule to Show Cause hearing.

ANSWER: Respondent admits the allegation as set forth in Paragraph 21 of Count I of the Administrator's Complaint.

22. Tonny testified that she was told that she didn't have to be at the depositions

because "we were in appeals." She also testified that between December 3 and December 9, 2021, she did not make any preparations to be deposed.

ANSWER: Respondent admits the allegations as set forth in Paragraph 22 of Count I of the Administrator's Complaint.

23. Penny testified that she was not present for her deposition on December 9. She testified that "we were under the understanding that we were in appeals and everything stopped at that point when we filed for an appeal." And that her understanding came, in part to "somebody else told me we didn't have to be there."

ANSWER: Respondent admits the allegations as set forth in Paragraph 23 of Count I of the Administrator's Complaint.

24. At the conclusion of Tonny and Penny's testimony, the court stated:

> "What I will tell you, though, is I think I now have a requirement to turn this into the ARDC as the testimony has been presented that both Williamsons have been told by someone clearly not to appear because they're in an appeal, which does nothing but delay the case. The only person I would turn in at this juncture would be Mr. Meade, because he is their counsel of record, and I believe I have to do that under these circumstances. [. .]. They were advised not to appear to the deposition by somebody, and I guess the ARDC will figure out who as I believe attorney-client privilege will go out the window then."

ANSWER: Respondent admits the allegations as set forth in Paragraph 24 of Count I of the Administrator's Complaint.

25. The court found both Williamsons in indirect civil contempt, noting that "from the evidence deduced they were clearly instructed not to appear."

ANSWER: Respondent admits the allegations as set forth in Paragraph 25 of Count I of the

Administrator's Complaint.

26. The Williamsons discharged Respondent as their attorney on or about January 27, 2022.

ANSWER: Respondent admits the allegation as set forth in Paragraph 26 of Count I of the Administrator's Complaint.

27. On February 23, 2022, the attorneys, Respondent and Penny appeared in court for, *inter alia,* a continuation of the Rule to Show Cause hearing. Penny was represented by the Williamsons' new counsel, James Nepple. The court examined Penny and Respondent, under oath.

ANSWER: Respondent admits the allegations as set forth in Paragraph 27 of Count I of the Administrator's Complaint.

28. Penny testified that it was Respondent who told her and Tonny that they didn't have to go to the depositions "because we were in appeals" sometime during the week that the depositions were scheduled.

ANSWER: Respondent admits the allegations as set forth in Paragraph 28 of Count I of the Administrator's Complaint.

29. Respondent testified that on December 8, 2021, he met with the Williamsons for two and one-half hours in preparation for the depositions.

ANSWER: Respondent admits the allegation as set forth in Paragraph 29 of Count I of the Administrator's Complaint.

30. Respondent's testimony that he prepared the Williamsons for their depositions on December 8, 2021 was false because Respondent had not prepared the Williamsons for their depositions on December 8, 2021.

ANSWER: Respondent admits the allegations as set forth in Paragraph 30 of Count I of the Administrator's Complaint.

31. Respondent knew that his testimony described in paragraph 29, above, was false at the time he gave it.

ANSWER: Respondent admits the allegations as set forth in Paragraph 31 of Count I of the Administrator's Complaint.

32. Respondent denied telling the Williamsons that they would not have to attend the depositions because an appeal had been requested.

ANSWER: Respondent admits the allegation as set forth in Paragraph 32 of Count I of the Administrator's Complaint.

33. Respondent's testimony denying that he told the Williamsons that they would not have to attend the depositions because an appeal had been requested was false because he did tell the Williamsons that they would not have to attend the depositions because an appeal had been requested.

ANSWER: Respondent admits the allegations as set forth in Paragraph 33 of Count I of the Administrator's Complaint.

34. Respondent knew that his testimony described in paragraph 32, above, was false at the time he gave it.

ANSWER: Respondent admits the allegation as set forth in Paragraph 34 of Count I of the Administrator's Complaint.

35. Respondent testified that he "believes" he made it clear that they (being the Williamsons) were to be in Galesburg to give a deposition on December 9, 2021.

ANSWER: Respondent admits the allegation as set forth in Paragraph 35 of Count I of the Administrator's Complaint.

36. Respondent's testimony that he "believes" he made it clear that they were to be in Galesburg to give a deposition on December 9, 2021 was false, because Respondent had not told them to appear in Galesburg on December 9, 2021 to give their depositions.

ANSWER: Respondent admits the allegations as set forth in Paragraph 36 of Count I of the Administrator's Complaint.

37. Respondent knew that his testimony described in paragraph 35, above, was false at the time he gave it.

ANSWER: Respondent admits the allegations as set forth in Paragraph 37 of Count I of the Administrator's Complaint.

38. By reason of the conduct described above, Respondent has engaged in the following misconduct:

a. knowingly making a false statement of fact or law to a tribunal by conduct including falsely stating that neither of his clients (the Williamsons) were able to make the January 10, 2022 hearing because "they were not feeling well,"; by testifying that he had met with the

Williamsons on December 8, 2021 in preparation for their depositions; his testimony denying that he told the Williamsons that the cases were "on appeal" and that their depositions were canceled; and his testimony that he believes he told the Williamsons that they were to be in Galesburg on December 9, 2021 for their depositions, in violation of Rule 3.3(a) of the Illinois Rules of Professional Conduct (2010); and

b. conduct involving dishonesty, fraud, deceit or misrepresentation by conduct including falsely stating that neither of his clients (the Williamsons) were able to make the January 10, 2022 hearing because "they were not feeling well,"; by testifying that he had met with the Williamsons on December 8, 2021 in preparation for their depositions; his testimony denying that he told the Williamsons that the cases were "on appeal" and that their depositions were canceled; and his testimony that he believes he told the Williamsons that they were to be in Galesburg on December 9, 2021 for their depositions, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

ANSWER: Respondent admits the allegations as set forth in Subsections (a) and (b) of Paragraph 38 of Count I of the Administrator's Complaint.

COUNT II

(Making False Statements to Clients and Counsel-Knox County Consolidated Cases)

The Administrator realleges and incorporates paragraphs 1 through 13, above.

ANSWER: Respondent restates and reaffirms his answers to Paragraphs 1 through 13 of the Administrator's Complaint, as set forth above, as and for his answers to Paragraphs 1 through 13 of Count II of the Complaint.

39. Respondent's statement to Mangieri on November 4, 2021, that his father had sustained a medical emergency as a basis for continuing Tonny and Penny's depositions

scheduled for that day was false, because Respondent's father had not sustained a medical emergency that day.

ANSWER: Respondent admits the allegations as set forth in Paragraph 39 of Count II of the Administrator's Complaint.

40. Respondent knew that his statement in paragraph 39, above, was false at the time he made it.

ANSWER: Respondent admits the allegation as set forth in Paragraph 40 of Count II of the Administrator's Complaint.

41. Respondent's statement to the Williamsons that their depositions would not go forward on December 9, 2021, due to the filing of the Motion to Certify Questions for Interlocutory Appeal, was false because the filing of the Motion to Certify Questions for Interlocutory Appeal did not serve to cancel those depositions.

ANSWER: Respondent admits the allegations as set forth in Paragraph 41 of Count II of the Administrator's Complaint.

42. Respondent knew that his statement in paragraph 41, above, was false at the time he made it.

ANSWER: Respondent admits the allegation as set forth in Paragraph 42 of Count II of the Administrator's Complaint.

43. As of December 8, 2021, Respondent knew that the Williamsons would not be appearing for their depositions the next day.

ANSWER: Respondent admits the allegation as set forth in Paragraph 43 of Count II of the

Administrator's Complaint.

44. Respondent resides in Canton, an approximately 50-60-minute drive from Galesburg, where the depositions were scheduled to take place.

ANSWER: Respondent admits the allegation as set forth in Paragraph 44 of Count II of the Administrator's Complaint.

45. On the morning of December 9, 2021, beginning at approximately 8:01 a.m., Respondent began engaging in a text conversation with Mangieri, regarding the depositions scheduled for that day. Respondent indicated that he was unable to start his car, but had someone coming to try and jump start it. Mangieri indicated that if they needed to start late, it was not a problem, and asked Respondent to keep him advised of the situation. Contingencies of Respondent getting a ride to Galesburg with the Williamsons and the attorneys gathering in Canton to take the depositions, were discussed. Mangieri then stated:

> "First, I would say keep trying on starting. Second, your clients are not here, do you want me to convey to them your dilemma?"

ANSWER: Respondent admits the allegations as set forth in Paragraph 45 of Count II of the Administrator's Complaint.

46. Respondent replied:

> "They know, they are [. . .] eccentric and prefer not to enter until I'm there. We'll keep working here."

ANSWER: Respondent admits the allegations as set forth in Paragraph 46 of Count II of the Administrator's Complaint.

47. Respondent's statement that the Williamsons "prefer not to enter until I'm there" was false, because Respondent knew that the Williamsons were not in Galesburg, as they were not appearing for their depositions that day.

ANSWER: Respondent admits the allegations as set forth in Paragraph 47 of Count II of the Administrator's Complaint.

48. Respondent knew that his statement in paragraph 46, above, was false at the time he made it.

ANSWER: Respondent admits the allegation as set forth in Paragraph 48 of Count II of the Administrator's Complaint.

49. At 8:34 a.m. on December 9, 2021, Respondent sent the following text message to

Tonny:

> "This is Trygve. I called Penny already, but I wanted to let you know that my car isn't starting this morning and I'm staying in [C]anton."

ANSWER: Respondent admits the allegation as set forth in Paragraph 49 of Count II of the Administrator's Complaint.

50. At 9:20 a.m., Mangieri went on the record, stating:

> "We're back on the record in this case at 9:20. I received a telephone call from Mr. Meade. Trygve advised that his car had been started, it was running. He's going to let it run for a bit. He said he would be heading out in ten minutes and would be able to attend the depositions thereafter. So we'll wait for Mr. Meade."

ANSWER: Respondent admits the allegation as set forth in Paragraph 50 of Count II of the Administrator's Complaint.

51. Respondent's statement to Mangieri that he would be able to attend the depositions was false, because Respondent knew that the Williamsons were not going to appear in Galesburg that day for their depositions.

ANSWER: Respondent admits the allegation as set forth in Paragraph 51 of Count II of the Administrator's Complaint.

52. Respondent knew that his statement in paragraph 50, above, was false at the time he made it.

ANSWER: Respondent admits the allegation as set forth in Paragraph 52 of Count II of the Administrator's Complaint.

53. Respondent arrived at the location where the depositions were to be conducted at approximately 10:15 a.m. The Williamsons were not present. The attorneys went on the record at 10:28 a.m., with John Robertson, attorney for the Galesburg Rifle Club and Catholic Dioceses, stating:

> "I was just going to say I think it was 10: 15, or thereabouts, when Tryg got here. And he's indicated he's going to call his clients and find out what their status is."

ANSWER: Respondent admits the allegations as set forth in Paragraph 53 of Count II of the Administrator's Complaint.

54. Respondent stated:

> "And I've already done so once before we went on the record now. I just did not reach them."

ANSWER: Respondent admits the allegation as set forth in Paragraph 54 of Count II of the Administrator's Complaint.

55. Respondent's statement that he'd attempted to reach the Williamsons and was unable to reach them was false, because Respondent knew that the Williamsons would not be appearing in Galesburg that day for their depositions.

ANSWER: Respondent admits the allegations as set forth in Paragraph 55 of Count II of the Administrator's Complaint.

56. Respondent knew that his statement in paragraph 54, above, was false at the time he made it.

ANSWER: Respondent admits the allegation as set forth in Paragraph 56 of Count II of the Administrator's Complaint.

57. The attorneys went off the record, then went back on 11:03 a.m. Mangieri commented that Tonny had not appeared for her deposition and that he did not want to proceed if she appeared before Penny's deposition, scheduled for 1:00 p.m. He indicated that if Tonny was to arrive at 1:00 p.m., he would proceed with her deposition first and try to get both depositions done that day. Robertson indicated his agreement with this plan.

ANSWER: Respondent admits the allegations as set forth in Paragraph 57 of Count II of the Administrator's Complaint.

58. Respondent subsequently stated:

> "And I would just comment that I did advise them this morning that I was having automotive difficulties. I indicated to them that I would call them when I reach Galesburg to let them know I was here to appear."

ANSWER: Respondent admits the allegation as set forth in Paragraph 58 of Count II of the Administrator's Complaint.

59. Respondent's statement that he indicated to the Williamsons that he would call them when he reached Galesburg to let them know he was there to appear was false, because Respondent knew that the Williamsons would not be appearing in Galesburg that day for their depositions.

ANSWER: Respondent admits the allegations as set forth in Paragraph 59 of Count II of the Administrator's Complaint.

60. Respondent knew that his statement in paragraph 58, above, was false at the time he made it.

ANSWER: Respondent admits the allegation as set forth in Paragraph 60 of Count II of the Administrator's Complaint.

61. Respondent continued with his remarks:

> "I would further indicate that I have tried to get ahold of them since then, that it is unusual that I am not able to get ahold of them, and I don't have any reason to think they're being evasive or in any way trying to avoid the deposition. My assumption is that there is some reasonable explanation for this."

ANSWER: Respondent admits the allegations as set forth in Paragraph 61 of Count II of the Administrator's Complaint.

62. Respondent's statement that "I have tried to get ahold of them since then, that it is unusual that I am not able to get ahold of them" was false, because Respondent knew that the Williamsons would not be appearing in Galesburg that day for their depositions.

ANSWER: Respondent admits the allegations as set forth in Paragraph 62 of Count II of the

Administrator's Complaint.

63. Respondent knew that his statement in paragraph 61, above, was false at the time he made it.

ANSWER: Respondent admits the allegation as set forth in Paragraph 63 of Count II of the Administrator's Complaint.

64. Respondent's statement that "I don't have any reason to think they're being evasive or in any way trying to avoid the deposition" was false, because Respondent knew that the Williamsons would not be appearing in Galesburg that day for their depositions.

ANSWER: Respondent admits the allegations as set forth in Paragraph 64 of Count II of the Administrator's Complaint.

65. Respondent knew that his statement in paragraph 61, above, was false at the time he made it.

ANSWER: Respondent admits the allegations as set forth in Paragraph 65 of Count II of the Administrator's Complaint.

66. Respondent's statement that "my assumption is that there is some reasonable explanation for this" was false because Respondent knew that the Williamsons would not be appearing in Galesburg that day for their depositions.

ANSWER: Respondent admits the allegations as set forth in Paragraph 66 of Count II of the Administrator's Complaint.

67. Respondent knew that his statement in paragraph 61, above, was false at

the time he made it.

ANSWER: Respondent admits the allegation as set forth in Paragraph 67 of Count II of the Administrator's Complaint.

68. Respondent continued with his remarks:

> "I will continue to try to contact them and try to get them both here at 1:00, and that I would just thank everybody for their patience and make those apologies, particularly Madam Court Reporter. This really isn't anything, you know, that you should have to deal with."

ANSWER: Respondent admits the allegation as set forth in Paragraph 68 of Count II of the Administrator's Complaint.

69. Respondent's statement that "I will continue to try to contact them and try to get them both here at 1:00" was false because Respondent knew that the Williamsons would not be appearing in Galesburg that day for their depositions.

ANSWER: Respondent admits the allegations as set forth in Paragraph 69 of Count II of the Administrator's Complaint.

70. Respondent knew that his statement in paragraph 68, above, was false at the time he made it.

ANSWER: Respondent admits the allegations as set forth in Paragraph 70 of Count II of the Administrator's Complaint.

71. Respondent continued with his remarks:

> "So but our intent would be to, if we're not able to complete this one at 9:00. Which I would agree that we're not able to, to try to do them both this afternoon, or otherwise try to get them done within as quickly a time frame as appropriate."

ANSWER: Respondent admits the allegations as set forth in Paragraph 71 of Count II of the Administrator's Complaint.

72. Respondent's statement that "So but our intent would be to, if we're not able to complete this one at 9:00. Which I would agree that we're not able to, to try to do them both this afternoon," was false because Respondent knew that the Williamsons would not be appearing in Galesburg that day for their depositions.

ANSWER: Respondent admits the allegations as set forth in Paragraph 72 of Count II of the Administrator's Complaint.

73. Respondent knew that his statement in paragraph 71, above, was false at the time he made it.

ANSWER: Respondent admits the allegation as set forth in Paragraph 73 of Count II of the Administrator's Complaint.

74. Neither of the Williamsons appeared for Penny's scheduled deposition for 1:00. The attorneys went back on the record, with Mangieri deferring to Respondent to make a statement relative to Penny's absence.

ANSWER: Respondent admits the allegations as set forth in Paragraph 74 of Count II of the Administrator's Complaint.

75. Respondent stated:

"There may have been some confusion on my clients' part."

ANSWER: Respondent admits the allegation as set forth in Paragraph 75 of Count II of the Administrator's Complaint.

76. Respondent's statement that "there may have been some confusion on my clients' part" was false because there was no confusion on his clients' part; Respondent knew that the Williamsons would not be appearing in Galesburg that day for their depositions.

ANSWER: Respondent admits the allegations as set forth in Paragraph 76 of Count II of the Administrator's Complaint.

77. Respondent knew that his statement in paragraph 75, above, was false at the time he made it.

ANSWER: Respondent admits the allegation as set forth in Paragraph 77 of Count II of the Administrator's Complaint.

78. Respondent also stated:

> "It is unclear to me what the reason is for the absence is, but I haven't been able to contact them this morning, and so I don't reasonably expect that anything will change about that."

ANSWER: Respondent admits the allegation as set forth in Paragraph 78 of Count II of the Administrator's Complaint.

79. Respondent's statement that "it is unclear to me what the reason is for the absence is, but I haven't been able to contact them this morning, and so I don't reasonably expect that anything will change about that" was false because it was clear to Respondent why the Williamsons were absent as he knew that they would not be appearing in Galesburg that day for their depositions.

ANSWER: Respondent admits the allegations as set forth in Paragraph 79 of Count II of the

Administrator's Complaint.

80. Respondent knew that his statement in paragraph 78, above, was false at the time he made it.

ANSWER: Respondent admits the allegations as set forth in Paragraph 80 of Count II of the Administrator's Complaint.

81. By reason of the conduct described above, Respondent has engaged in the following misconduct:

a. knowingly making false statements of material fact or law to a third person by conduct including making the knowingly false statements described in paragraphs 39, 41, 46, 50, 54, 58, 61, 68, 71, 75, and 78, above, in violation of Rule 4.1(a) of the Illinois Rules of Professional Conduct (2010); and

b. conduct involving dishonesty, fraud, deceit or misrepresentation by conduct including making the knowingly false statements described in paragraphs 39, 41, 46, 50, 54, 58, 61, 68, 71, 75, and 78, above, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

ANSWER: Respondent admits the allegations as set forth in Subsections (a) and (b) of Paragraph 81 of Count II of the Administrator's Complaint.

COUNT III

(Lack of Diligence and Making False Statements-Royale J Surratt)

82. At all times alleged in this count, Respondent was the principal attorney at Meade Law Office, P.C. in Canton, Illinois.

ANSWER: Respondent admits the allegation as set forth in Paragraph 82 of Count III of the Administrator's Complaint.

83. On or about October 7, 2022, Royale J. Surratt ("Surratt") and Respondent agreed that Respondent would represent Surratt for a flat fee of $1,000 in McDonough County Case No. 2022-CM-00155, captioned *The People of the State of Illinois, Plaintiff vs. Royale J. Surratt, Defendant.*

ANSWER: Respondent admits the allegations as set forth in Paragraph 83 of Count III of the Administrator's Complaint.

84. At the time that Respondent agreed to represent Surratt, he knew that she and her family were relocating to Texas.

ANSWER: Respondent admits the allegation as set forth in Paragraph 84 of Count III of the Administrator's Complaint.

85. On October 14, 2022, Surratt, now residing in Texas, sent Respondent an email asking if he "could please move our court date on the 18th I just need a little more time." Respondent responded "yes."

ANSWER: Respondent admits the allegations as set forth in Paragraph 85 of Count III of the Administrator's Complaint.

86. Surratt sent Respondent emails on October 17 and 19, 2022, requesting information concerning the requested rescheduling of the court appearance. Respondent did not respond to those emails.

ANSWER: Respondent admits the allegations as set forth in Paragraph 86 of Count III of the Administrator's Complaint.

87. At no time did Respondent enter his appearance as Surratt's counsel,

communicate with the prosecutor handling the case or appear in court on Surratt's behalf at the October 19. 2022 court appearance. As neither Surratt nor an attorney representing her appeared in court, an order of forfeiture was entered and a warrant of arrest was issued.

ANSWER: Respondent admits the allegations as set forth in Paragraph 87 of Count III of the Administrator's Complaint.

88. Surratt sent Respondent an email on October 21, 2022, asking if he had received her emails of October 17 and 19, 2022, and requesting an update.

ANSWER: Respondent admits the allegations as set forth in Paragraph 88 of Count III of the Administrator's Complaint.

89. Respondent responded by email, stating, "Hey, yes! It's three weeks from Tuesday."

ANSWER: Respondent admits the allegations as set forth in Paragraph 89 of Count III of the Administrator's Complaint.

90. Respondent's statement that "It's [the court appearance] three weeks from Tuesday" was false because the court appearance had not been continued.

ANSWER: Respondent admits the allegation as set forth in Paragraph 90 of Count III of the Administrator's Complaint.

91. Respondent knew that his statement in paragraph 89, above, was false at the time he made it.

ANSWER: Respondent admits the allegation as set forth in Paragraph 91 of Count III of the Administrator's Complaint.

92. Surratt sought clarification as to whether Respondent meant three weeks from "this Tuesday or this coming Tuesday?"

ANSWER: Respondent admits the allegation as set forth in Paragraph 92 of Count III of the Administrator's Complaint.

93. Respondent responded "this coming."

ANSWER: Respondent admits the allegation as set forth in Paragraph 93 of Count III of the Administrator's Complaint.

94. Respondent's statement that "this coming [Tuesday]" was false because the court appearance had not been continued.

ANSWER: Respondent admits the allegation as set forth in Paragraph 94 of Count III of the Administrator's Complaint.

95. Respondent knew that his statement in paragraph 93, above, was false at the time he made it.

ANSWER: Respondent admits the allegation as set forth in Paragraph 95 of Count III of the Administrator's Complaint.

96. On October 30, 2022, Surratt sent Respondent an email, indicating that she had seen an active warrant list and her name was still on it for a failure to appear. She stated "Why hasn't this been fixed yet? I don't need any problems walking into court with a warrant. This isn't even my fault."

ANSWER: Respondent admits the allegations as set forth in Paragraph 96 of Count III of the Administrator's Complaint.

97. Respondent responded on October 30, 2022, by email, "No clue - I'll get it quashed, though!"

ANSWER: Respondent admits the allegations as set forth in Paragraph 97 of Count III of the Administrator's Complaint.

98. Respondent's statement "no clue" was false because Respondent knew why the warrant had been issued.

ANSWER: Respondent admits the allegations as set forth in Paragraph 98 of Count III of the Administrator's Complaint.

99. Respondent knew that his statement in paragraph 97, above, was false at the time he made it.

ANSWER: Respondent admits the allegation as set forth in Paragraph 99 of Count III of the Administrator's Complaint.

100. In early February 2023, Surratt inquired of Respondent as to the status of the motion to quash.

ANSWER: Respondent admits the allegation as set forth in Paragraph 100 of Count III of the Administrator's Complaint.

101. On February 13, 2023, Respondent sent Surratt an email, stating, in part: "Yes, I will! I'm actually going to be there on Wednesday, and I figured I'd check on the order quashing it then."

ANSWER: Respondent admits the allegations as set forth in Paragraph 101 of Count III of the Administrator's Complaint.

102. Respondent's statement "Yes, I will! I'm actually going to be there on Wednesday, and I figured I'd check on the order quashing it then" was false because Respondent had not filed a motion to quash the warrant and there was no order to check on.

ANSWER: Respondent admits the allegations as set forth in Paragraph 102 of Count III of the Administrator's Complaint.

103. Respondent knew that his statement in paragraph 101 was false at the time he made it.

ANSWER: Respondent admits the allegations as set forth in Paragraph 103 of Count III of the Administrator's Complaint.

104. By reason of the conduct described above, Respondent has engaged in the following misconduct:

a. failing to act with reasonable diligence and promptness in representing a client, by conduct including failing to enter his appearance, failing to communicate with the prosecutor regarding the case, and failing to appear for the October 19, 2022 court appearance, in violation of Rule 1.3 of the Illinois Rules of Professional Conduct (2010);

b. knowingly making false statements of material fact or law to third persons by conduct including the false statements Respondent made to Surratt described in paragraphs 89, 93, 97 and 101, above, in violation of Rule 4.1(a) of the Illinois Rules of Professional Conduct (2010); and

c. conduct involving dishonesty, fraud, deceit or misrepresentations by conduct including making the false representations to Surratt described in paragraphs

89, 93, 97 and 101, above, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

ANSWER: Respondent admits the allegations as set forth in Subsections (a) through (c) of Paragraph 104 of Count III of the Administrator's Complaint.

COUNT IV

(Failure to Communicate with Client and Lack of Diligence- Teresa Hollenback)

105. At all times alleged in this count, Respondent was the principal attorney at Meade Law Office, P.C. in Canton, Illinois.

ANSWER: Respondent admits the allegation as set forth in Paragraph 105 of Count IV of the Administrator's Complaint.

106. During the May 1-June 22, 2022 timeframe, Respondent was representing Teresa Hollenback ("Hollenback") in Fulton County Case No. 19-F-155, captioned *David D. Brown, Petitioner v. Teresa Hollenback, Respondent.*

ANSWER: Respondent admits the allegations as set forth in Paragraph 106 of Count IV of the Administrator's Complaint, with the exception of the case number, which is 2019-F-55.

107. Hollenback had allegedly failed to meet her obligations to pay the balance owed to the court-appointed guardian *ad litem* ("GAL"), Alison Vawter ("Vawter"). Vawter noticed a status hearing for May 2, 2022 to seek the court's guidance as to how to recover the outstanding balance.

ANSWER: Respondent admits the allegations as set forth in Paragraph 107 of Count IV of the Administrator's Complaint.

108. On the morning of May 2, 2022, Respondent called Vawter to discuss what settlement terms would be acceptable. Vawter told Respondent that Hollenback needed to

resume paying the $100 per month, per Hollenback' s prior commitment that she'd stopped meeting, and make a lump sum payment of $400 by the end of the day. Respondent responded by text later that day, stating: "Sh[e] can catch it up. For administrative convenience, shall we say COB tomorrow?" Vawter responded her agreement to the terms and indicated she would prepare an agreed order.

ANSWER: Respondent admits the allegations as set forth in Paragraph 108 of Count IV of the Administrator's Complaint.

109. On May 3, 2022, Hollenback emailed Vawter asking what had happened the day before. Vawter responded:

> "There was no hearing yesterday as far as I am aware. Tryg indicated you had agreed to catch up on your payments by 5 o'clock today, which would be $400, and resume making regular payments of $100 a month on the 28th of each month, starting May 28. Is that correct?"

ANSWER: Respondent admits the allegations as set forth in Paragraph 109 of Count IV of the Administrator's Complaint.

110. Hollenback responded:

"Ummm I didn't agree to that at all!!"

ANSWER: Respondent admits the allegation as set forth in Paragraph 110 of Count IV of the Administrator's Complaint.

111. In a subsequent email Hollenback sent that day to Vawter, Hollenback stated:

> "He just called me at 10:00 am said he spoke to you and Nathan [counsel representing David D. Brown] and said the papers would be filed yesterday/today and that child support ended yesterday only agreement was I had to start paying you again since I'd have more money. I asked if I needed to get ahold of you yesterday he said no

> papers would be filed via court house for the order. He absolutely did not mention the $400 by today. I don't have any money at the moment. I'd never agree to that if I couldn't pay that. I'm calling his office I have had it with the go around on this case!"

ANSWER: Respondent admits the allegations as set forth in Paragraph 111 of Count IV of the Administrator's Complaint.

112. In a subsequent email sent on May 3, 2022, to Vawter, Hollenback stated: "He just called me he said he's paying the $400? Let me know if he doesn't?"

ANSWER: Respondent admits the allegation as set forth in Paragraph 112 of Count IV of the Administrator's Complaint.

113. On May 4, 2022, Hollenback sent Vawter an email, asking if the money got sent. Vawter replied "no" and Hollenback indicated she would call and email Respondent.

ANSWER: Respondent admits the allegations as set forth in Paragraph 113 of Count IV of the Administrator's Complaint.

114. Pursuant to her May 3, 2022 telephone conversation with Respondent, Vawter had prepared and circulated an agreed order and continued the May 3, 2022 status conference. Respondent and opposing counsel, Nathan Collins, as well as Vawter, signed the agreed order and it was entered on May 6, 2022.

ANSWER: Respondent admits the allegations as set forth in Paragraph 114 of Count IV of the Administrator's Complaint.

115. Vawter did not receive the $400 payment and re-noticed the status hearing for June 22, 2022.

ANSWER: Respondent admits the allegation as set forth in Paragraph 115 of Count IV of the

Administrator's Complaint.

116. A status hearing was held on June 22, 2022. After the hearing, Vawter received a $400 check from Respondent, drawn on his IOLTA account.

ANSWER: Respondent admits the allegations as set forth in Paragraph 116 of Count IV of the Administrator's Complaint.

117. By reason of the conduct described above, Respondent has engaged in the following misconduct:

a. failing to promptly inform the client of any decision or circumstance with respect to which the client's informed consent, as defined in Illinois Rule of Professional Conduct 1.0(e) is required by the Rules of Professional Conduct, by failing to discuss and obtain Hollenback's consent before obligating Hollenback to make a $400 payment to Vawter by the close of business on May 4, 2022, in violation of Rule 1.4(a)(1) of the Illinois Rules of Professional Conduct (2010);

b. failing to reasonably consult with the client about the means by which the client's objectives are to be accomplished, by failing to discuss and obtain Hollenback's consent before obligating Hollenback to make a $400 payment to Vawter by the close of business on May 4, 2022, in violation of Rule 1.4(a)(2) of the Illinois Rules of Professional Conduct (2010);

c. failing to keep the client reasonably informed about the status of the matter, by failing to disclose that he had entered into an agreed order on Hollenback's behalf, obligating her to make a $400 payment to Vawter by the close of business on May 4, 2022, and failing to inform her that she was subject to being held in contempt of court if she failed to comply with the agreed order, in violation of Rule 1.4(a)(3) of the Illinois Rules of Professional Conduct (2010).; and

d. failing to act with reasonable diligence and promptness in representing a client, by conduct including failing to either remit the $400 he'd agreed to provide to Vawter by 5:00 p.m. on May 4, 2022 or moving to vacate or modify the agreed order entered on May 6, 2022, to protect his client from being held in contempt of court for failing to comply with the terms of the agreed order, in violation of Rule 1.3 of the Illinois Rules of Professional Conduct (2010).

ANSWER: Respondent admits the allegations as set forth in Subsections (a) through (d) of Paragraph 117 of Count IV of the Administrator's Complaint.

COUNT V

(Providing Financial Assistance to a Client-Daniel Dallefeld)

118. At all times alleged in this count, Respondent was the principal attorney at Meade Law Office, P.C. in Canton, Illinois.

ANSWER: Respondent admits the allegation as set forth in Paragraph 118 of Count V of the Administrator's Complaint.

119. On February 4, 2023, Daniel Dallefeld ("Dallefeld") was arrested and cited by the Canton police for driving under the influence and child endangerment.

ANSWER: Respondent admits the allegations as set forth in Paragraph 119 of Count V of the Administrator's Complaint.

120. Dallefeld's bond amount to get out of custody was $100 plus $29.60 in costs, for a total of $129.60.

ANSWER: Respondent admits the allegations as set forth in Paragraph 120 of Count V of the Administrator's Complaint.

121. Dallefeld did not have the money to bond himself out of custody.

ANSWER: Respondent admits the allegation as set forth in Paragraph 121 of Count V of the Administrator's Complaint.

122. On and prior to Dallefeld's February 4, 2023 arrest, Respondent represented Dallefeld in Fulton County Case Number 2021-D-l 07, *Katherine Dianne Dallefeld, Petitioner v. Daniel S. Dallefeld, Respondent.*

ANSWER: Respondent admits the allegation as set forth in Paragraph 122 of Count V of the Administrator's Complaint.

123. On February 4, 2023, Dallefeld asked Respondent to "front" him the money necessary to bond out of custody.

ANSWER: Respondent admits the allegation as set forth in Paragraph 123 of Count V of the Administrator's Complaint.

124. On February 4, 2023, Dallefeld contemplated hiring Respondent to represent him on the criminal charges resulting from his February 4, 2023 arrest.

ANSWER: Respondent admits the allegation as set forth in Paragraph 124 of Count V of the Administrator's Complaint.

125. On February 4, 2023, Respondent forwarded $130 of his own money to Dallefeld using "Cash App" a mobile payment service that allows users to transfer money to on another using a mobile phone.

ANSWER: Respondent admits the allegation as set forth in Paragraph 125 of Count V of the Administrator's Complaint.

126. On February 4, 2023 Dallefeld, using the $130 fronted to him by

Respondent, bonded out of custody.

ANSWER: Respondent admits the allegation as set forth in Paragraph 126 of Count V of the Administrator's Complaint.

127. By reason of the conduct described above, Respondent has engaged in the following misconduct:

a. providing financial assistance to a client in connection with a pending or contemplated litigation, by providing $130 of his own money to Dallefeld so Dallefeld could bond himself out of custody on February 4, 2023, in violation of Rule 1.8(e) of the Illinois Rules of Professional Conduct (2010).

ANSWER: Respondent admits the allegation as set forth in Subsection (a) of Paragraph 127 of Count V of the Administrator's Complaint.

WHEREFORE, Respondent, TRYGVE THOMAS MEADE, would request that the Hearing Board set a hearing on the Complaint filed in this cause by the Administrator of the Attorney Registration and Disciplinary Commission, JEROME LARKIN, consider the evidence presented by the parties and make a recommendation to the Supreme Court of Illinois which is right and just based upon the facts and law presented.

Respectfully submitted,

TRYGVE THOMAS MEADE, Respondent

By: /s/William F. Moran, III
His attorney

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