

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

In the Matter of:)
)
MARGARET JEAN LOWERY,)
) Commission No. 2023PR00060
Attorney-Respondent,)
)
No. 6271777.)

NOTICE OF FILING

PLEASE TAKE NOTICE that on this 15th day of February, 2024 the undersigned emailed to Ms. Rachel Miller rmiller@iardc.org Respondent’s Answer to Amended Complaint which are attached hereto and hereby served upon you.

Margaret J. Lowery
Margaret J. Lowery, IARDC 6271777
7122 South Sheridan Road
Suite 2-1110
Tulsa, OK 74133
mlowery@thelowerylawfirm.com
(618)741-6600

PROOF OF SERVICE

The undersigned, an attorney, hereby certifies, pursuant to Illinois Code of Civil Procedure, 735-ILCS-5/109, that Ms. Lowery served copies of the Respondents Proposed Order for Substitution to Rachael Miller sent via email at rmiller@iardc.org and William Moran, III at bmoran@stratton-law.com at or before 5:00 p.m. Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Margaret J. Lowery

Margaret J. Lowery

FILED
2/15/2024 3:06 PM
ARDC Clerk

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

In the Matter of:)
)
MARGARET JEAN LOWERY,)
) Commission No. 2023PR00060
Attorney-Respondent,)
) M.R. 032026
No. 6271777.)

ANSWER TO AMENDED COMPLAINT

COMES NOW the Respondent Margaret Jean Lowery and for her ANSWER to the Amended Complaint of the Administrator answers as follows:

**COUNT I
(False Statement in a Pleading)**

1. On January 17, 2023 the Illinois Supreme Court entered an Order without disclosing its Conflict of Interest to Respondent. Specifically the Illinois Supreme Court had an affirmative duty to disclose its conflict of interest(s) specifically that Chief Justice Anne Burke’s spouse Ed Burke had made hateful comments against Illinois Jewish Attorneys while extorting them. He was found guilty of 13 of 14 federal criminal public corruption charges and the federal judge ruled his anti Semitic tropes could be played at his corruption trial. During Burke’s public corruption trial, the mainstream media reported that Chief Justice Burke had allegedly been caught laughing at her husband Jewish tropes. Whether that an accurate media report, it does not matter. The Justice and this Court had a duty to disclose the conflict and they did not. The conflict is mandatory under the Rules, not discretionary. The Court’s failure to disclose this conflict was intentional and it was done because this Court had a pecuniary interest in the outcome of the matter. In fact, it appears that the Court’s anti Semitic hate and self dealing have

FILED
2/15/2024 3:06 PM
ARDC Clerk

controlled its decisions throughout this case to such an extent that Respondent has been denied and shall be denied the right to a fair hearing. No attorney in Illinois can receive a fair hearing where one Chief Justice's husband spews Jew hate while extorting his husband while the other Chief Justice failed to follow court policy and act properly upon receiving a report of threat by a judge against a female attorney. Moreover, a reasonable inquiry would have shown the Judge in fact was harassing Ms. Lowery with baseless bar complaints which was entirely consistent with his November 20, 2018 threat. Next, Ms. Lowery completed all of the Illinois Supreme Court professionalism seminars offered in Illinois. When Ms. Lowery presented the Certificates to the Administrator, he retaliated against her and made her take additional courses in ARDC ethics which went directly against the Hearing Board Chair's Order. The Chair was female. Next, Commission Rules prohibit the recitation of prior discipline until same is established after a hearing. The Administrator has included this paragraph in this Complaint for the sole purpose of doing an end run around Commission Rules in order to further retaliate against Respondent.

2. On March 17, 2023, the Administrator sent a Statement of Costs to Respondent. Ms. Lowery asked the Administrator to explain the costs attributed to Synapsis Inc, and to identify each transcript. The Administrator refused to produce any explanation. Respondent thereafter issued a subpoena to Synapsis, Inc., in Springfield, Illinois to find out the basis of the Administrator's charges listed in the Cost Statement. Synapsis, Inc. produced no work to justify any of the charges in this case. They produced only an invoice and a contract. Since no work was produced, it appears the Administrator is engaging in some kind of billing fraud scheme with a vendor. When Ms. Lowery asked the vendor whether this was fraud, the company attorney wrote back saying the company

dissolved . To date no one has produced any documentation to support the Synapsis invoice.

3. At no time did Ms. Lowery pay the costs because the Administrator refused to produce any explanation for Synapsis and now it is discovered the Administrator's cost entries may have been fraudulent. So the Administrator is targeting Ms. Lowery because she exercised her constitutional right to question an invoice and this Court believes this amounts to some sort of bar regulation issue. No it represents a court system which harasses and bullies minority attorneys who refuse to be bullied by this Administrator. Ms. Lowery was well within her right to ask for an explanation and the Administrator intentionally denied providing any documentation because none exists. It appears to have been a billing scam because even when Ms. Lowery contacted Mr. Rotskoff he has refused to explain how there could be an invoice for thousands of dollar yet no documentation of any actual work.
4. Respondent admits the Administrator filed a Petition for Costs.
5. On April 4, 2023 and on April 24, 2023, Ms. Lowery filed a formal complaint pursuant to the Illinois Supreme Court Policy on Non Discrimination and Anti Harassment with the Illinois Supreme Court. Specifically Ms. Lowery complained Andrew Gleeson's was harassing her and he was misusing the bar regulation process. Andrew Gleeson misused the prestige of judicial office to file more than 21 baseless bar complaints against Respondent after threatening her with professional ruin on an elevator inside the St. Clair County Courthouse on November 20, 2018. Specifically Ms. Lowery complained to the Illinois Supreme Court in writing on October 29, 2018 that Andrew Gleeson was harassing her and displaying an 'unhealthy obsession with her.' As demonstrated proof of his unhealthy obsession, Ms. Lowery advised this Court that Andrew Gleeson had file the following harassing and baseless complaints:

Complaint #1	April 24, 2017
Complaint #2	April 26, 2017
Complaint #3	August 1, 2018
Complaint #4	April 24, 2017 (Rearguing closed complaint)
Complaint #5	April 26, 2017 (Rearguing closed complaint)
Complaint #6	August 6, 2018
Complaint #7	August 21, 2018
Complaint #8	October 15, 2018
Complaint #9	December 31, 2018
Complaint #10	October 19, 2022
Complaint #11	October 24, 2022
Complaint #12	October 25, 2022
Complaint #13	November 10, 2022
Complaint #14	November 17, 2023
Complaint #15	January 18, 2023
Complaint #16	January 24, 2023
Complaint #17	April 27, 2023
Complaint #18	July 13, 2023
Complaint #19	September 18, 2023
Complaint #20	October 9, 2023 (forwarded OK)
Complaint #21	November 30, 2023
Complaint #22	December 20, 2023

Ms. Lowery has never appeared as an attorney before Andrew Gleeson and he has no basis in fact to have filed any complaint. She has not been domiciled in Illinois since 2019 and she has only represented a small number of pro clients in Illinois since 2020.

6. On April 4 & 24, 2023 Respondent filed a formal written complaint to this Court reporting the abusive and harassing conduct of Andrew Gleeson. Andrew Gleeson threatened Respondent with professional annihilation and economic ruin (she would be living under a bridge) because Respondent told Gleeson “NO.” Andrew Gleeson’s retaliated by filing more than 20 baseless bar complaints against Respondent and his

conduct was entirely consistent with his threat on the elevator. The Administrator knows Andrew Gleeson's conduct constitutes harassment under Illinois Supreme Court policy, the Administrator has admitted to receiving Respondent's complaints of Gleeson's harassment in 2018 before any inquiry of professional misconduct was made against her. The Administrator has refused to follow Illinois Supreme Court policy, state and federal law in this matter. Instead the Administrator has retaliated against Respondent by charging her because the State of Illinois has a pecuniary interest in the outcome of this matter. The Court breached its duty to Respondent and it is now targeting her with baseless complaints to hide the harassment of one of its judges. Then the Administrator issued a letter accusing Respondent of lying when she said she reported the conduct to this Court. The Administrator did not make a reasonable inquiry because Chief Justice Lloyd Karmeier admitted he received notice of Gleeson's threat from Respondent in 2020 which should have triggered the Courts Non Discrimination and Anti Harassment Policy. The Court again failed Respondent. Ms. Lowery did not lie about what occurred and this Administrator is targeting Ms. Lowery because it is trying to cover up for Andrew Gleeson illegal harassment of her. The Administrator also failed in identifying the harassment in violation of state and federal law.

7. Not only was Respondent's statement not false, this Administrator knows or should have made a reasonable inquiry into the facts prior to making an accusation. A reasonable inquiry as required under the Rules of Professional Conduct and Illinois Supreme Court Policy would have demonstrated the above facts constitute harassment under Illinois Court Rules and that Respondent was being targeted because this Court violated its own policies in this matter and it now has a financial interest in seeing to it that Respondent's

credibility is destroyed. This Court has a pecuniary interest in the outcome of this matter which means the Court is now conflicted out.

8. The Administrator knows this Charge is false. She has known it was false since it was made. The Administrator has an eye witness third party who confirmed the event occurred, the retired Chief Justice Lloyd Karmeier confirmed Gleeson made the threat, the Illinois Supreme Court knew about the threat for three years and did NOTHING about it when it was required to follow its own policies. So not only does this Administrator know Respondent's statement was true, the Administrator has targeted Ms. Lowery with false professional disciplinary charges to cover up her own professional misconduct in not following court policy. It is a conflict of interest for any court to rule on their own malfeasance.
9. Respondent did not violate any Rule and the Administrator knows no Rules was violated and she has brought the Charges for an improper purpose.

COUNT II

(False Statement or a Statement made with reckless disregard concerning the Illinois Supreme Court)

10. Ms. Lowery realleges and reaffirms paragraphs 1-9.
11. Ms. Lowery was not an Illinois resident and she retired from the practice of law in Illinois in 2023. The name on her Twitter account was not Margaret J. Lowery of The Lowery Law Firm @lowerylawfirm and if this is the account the Administrator is claiming was hers then the entirety of this Complaint must be dismissed. That was not Respondent's account on July 6, 2023 and she did not create that account on or before July 6, 2023. Ms. Lowery has repeatedly informed the Administrator that over 20 fake

accounts exist on Twitter that look like her account. That is why she went to a private account and that is not her account on July 6, 2023 or at any time before that.

12. Ms. Lowery notified this Court that former Illinois attorneys were reporting a bullying issue within the ARDC. Some of the affected individuals reported feeling suicidal over the bullying. One of those individuals was former Illinois Attorney Caryn Haddix. Ms. Haddix written statement clearly stated in *Exhibit 1* that she stated she felt bullied by the Administrator to the point of suicidal ideation. Former Illinois Rhonda Crawford was an African American Attorney who committed suicide after the ARDC targeted her. Oklahoma Attorney Ronald Wilkinson provided an affidavit to the Administrator that he felt bullied by Andrew Gleeson and the ARDC. Ms. Lowery now states and her experts will confirm, the conduct of this Administrator is one of the worst case of harassment and bullying anyone has ever seen in professional regulation. One expert will opine that had Ms. Lowery not have been working with a group to uncover anti Semitism, it likely would not have been survivable for her. That is the intense level of bullying and harassment. While Ms. Lowery was in Illinois she was followed, physically attacked in the courthouse, her tires have been slashed, she received threatening text messages and it finally got so dangerous that health care professionals told her to leave Illinois for her own safety. Ms. Lowery has had to move, change her practice, sell her home, move two states away, defend false charges and what has Andrew Gleeson done, he denies he threatens women and then files more than 21 baseless complaints against them.
13. As provided by the evidence herein, there was a factual basis for the OPINION that there was bullying occurring within the ARDC, that the U.S. Government Center for Disease Control has made a governmental pronouncement that bullying causes suicide. This Court is paying for a bullying study by The Red Bee Group based upon a peer viewed

study in which this Court pronounced that bullying in the legal profession leads to adverse outcomes in attorney health & wellness. Next, the Administrator has for six months failed and refused to provide any evidence to support the claim that this OPINION was false and in fact Count II represents direct evidence that this Administrators has and currently is engaging in the bullying of an Illinois attorney.

14. The Administrator made the above charge knowing it was false, knowing it went directly against the U.S. Government CDC, directly against the Bullying Commission this Court formed, directly against the work of the Red Bee Group and all because this Administrator has a direct financial interest in the outcome of this Charge. The Administrator is the bully and by filing this Charge the Administrator has violated the Rules of Professional Conduct and the Illinois Supreme Court policy because Respondent notified this Court about the bullying issue BEFORE the Administrator filed or even presented any professional charge against Respondent. This Court and Administrator violated state and federal law by retaliating against Respondent for reporting bullying by the Administrator. The Administrator has targeted Respondent to do an end run around the Court's policy on harassment which prohibits these proceedings. The Illinois Supreme Court pretends to be concerned about diversity, equity and inclusion but this Court actions speak directly against its commitment to said goals and its own policies.

15. Respondent denies she has engage in any misconduct for the reasons stated herein.

COUNT III

(False Statement in Pleading about ARDC Review Board)

16. The Respondent reincorporates and realleges paragraphs 1-15 above.

17. Respondent did not make a factual allegations in any objection about the Review Board, she made a formal complaint pursuant to the Illinois Supreme Court Non Discrimination and Anti-Harassment Policy and provided an example to this Court from the Petition in Error filed Illinois Attorney Adrian Vuckovich. Mr. Vuckovich reported he could not find any reference in any transcript about a “misdirection of the ARDC investigation” and it is a very simple thing for this Administrator to produce the Complaint and the transcript pages where “misdirection of an ARDC investigation” occurred. Next, Ms. Lowery provided a peer review study to this Court whereupon it found bias occurs when female Respondents have all male review boards. This Court has a Court Rule about black criminal defendants not having an all racially ‘white’ jury because of the denial of substantive and procedural due process which results. Now the Illinois Supreme Court is trying to enforce a discriminatory pattern and claim it is bar regulation. It is not bar regulation, it is bullying and harassment of Respondent across state line.
18. Respondent’s statement was not false because she was citing a pleading made by Attorney Adrian Vuckovich which was presented to this Court. The Administrator is once again making up charges in order to target Respondent because the original Count I & II literally fell apart and now that a federal lawsuit has factual and legal basis, the Administrator had to invent more charges. This Answer clearly shows that at every turn the Respondent acted in an Honorable way, going through proper channels to report issues that were to be addressed by Court policy, state and federal law.

COUNT IV

**(False Statement or a Statement Made with Reckless Disregard for its Truth or Falsity
concerning the Integrity of the Illinois Supreme Court)**

21. Respondent realleges and reincorporates paragraphs 1-20.
22. The Administrator does not identify what Twitter account this was posted on. Because no identification of the account was made by the Administrator this Court must be dismissed. Next, the Review Board decision contains a statement that “Illinois attorneys have no first amendment rights.” Therefore it appears this post was lifted from the Review Board decision. While the Administrator was unhappy with the Review Board decision and appealed it, it is not appropriate to charge Ms. Lowery with the legal findings of the Review Board which was citing the Illinois Supreme Court’s cases. From page 23 of the Review Board Order ‘It is well established in Illinois that lawyers have no First Amendment Rights and they have no protection from discipline for making baseless accusations impugning a judges integrity.’ *In re Cohn 2018PR00109*. So now the Illinois Supreme Court targets attorneys for posting lines from their Orders? Does the Administrator and the Inquiry Board not perform a mandatory Rule 137 review before they target Jewish attorneys across state line with baseless complaints. This Administrator has a history of targeting Respondent with baseless Complaints. At the Hearing Board, they found the Administrator got the charges wrong 75% of the time. That’s the definition of harassment. Then the Administrator permits a judge to target a Respondent in another state with over 21 baseless complaints and her law partner had 5 baseless bar complaints. That is over 30 fraudulent charges this Administrator has wrongfully brought against Respondent without just or reasonable caus. It appears the Administrator is targeting Respondent for an illegal reason.
23. The Administrator is jumping to conclusions without even identifying the account and then cites language from the Review Board order as somehow impugning this Court? Clearly if an Illinois attorney makes ANY post about a judge they will be charged. Well

the Administrator just charged an attorney for posting a line from the Court's order that "Illinois attorneys have no 1st Amendment Rights." That's a direct quote from the Review Board Order. The line was posted. The Court charged Respondent. The statement is now true and the Count IV must be dismissed as baseless.

24. The statement could not be false because the Administrator has just proven the statement true by filing Count IV.
25. Once again the administrator has not identified what account this tweet was lifted from nor the context of the tweet. Without an account identifier this charge is improper. The Administrator previously identified the account as being "Margaret J. Lowery of The Lowery Law Firm @lowerylawfirm" and if this is the account the Administrator is claiming was Respondents, this Count must be dismissed as that was not her Twitter account on March 24, 2023.
26. Respondent could not have made a false statement because the Administrator has identified the wrong account.
27. The Administrator knows the Charge is false and she has interposed it for an improper purpose. Respondent denies the Charge.
28. Once again the Administrator does not identify the account this was taken from, however, Respondent has a log of all of her Tweets on August 11, 2023 and she provided them to the Administrator. This was not one of the Tweets. Next, anyone can read the tweet as asking a question. Questions cannot be a false statement. The poster clearly did not believe the statement was true. This is bullying behavior by the Administrator. Targeting a retired Jewish attorney in Oklahoma over 'tweets' from an account that the Administrator has falsely claimed was from "Margaret J. Lowery of The

Lowery Law Firm @lowerylawfirm” and this Administrator knows Ms. Lowery did not have a twitter account at that handle on that day.

29. The Administrator has not identified the source of the account this post was made from and the one account she did identify was not Respondents on the date the post was made and therefore the statement could not have been false.
30. The Administrator has targeted Respondent for an illegal reason and because she has a financial interest in the outcome of this case and Respondent denies the charge.
31. Respondent did post her objection to the State of Illinois targeting the Missouri Holocaust Museum with a secret governmental investigation demanding the name of every Jew in attendance because it was state action across state line into her religion and ethnicity which is not bar regulation. Next, when Respondent questioned the Administrator about her conduct this is what she wrote:

REQUEST #25: Conducting secret governmental investigations of Jews at religious meetings was a tactic used by the Gestapo and other Nazi governmental agencies.

RESPONSE NO. 25: The Administrator objects to this request for admission based on relevance.

REQUEST #26: In 2023, any secret governmental inquiry by the State of Illinois into whether an ethnic Jew attended a religious meeting in another state is not within the jurisdiction of the ARDC.

RESPONSE NO. 26: The Administrator objects to this request for admission based on relevance.

REQUEST #26 [sic]: In 2023, Illinois ARDC conducting a secret governmental inquiry into whether an ethnic Jew attended a religious meeting in Missouri amounts to state action.

RESPONSE NO. 26 [sic]: The Administrator objects to this request for admission based on relevance.

REQUEST #27: In 2023, Illinois ARDC conducting a secret governmental inquiry into whether an ethnic Jew attended a religious meeting in Missouri amounts to a civil rights violation.

RESPONSE NO. 27: The Administrator objects to this request for admission based on relevance.

REQUEST #28: In 2023, Illinois ARDC conducting a secret governmental inquiry into whether an ethnic Jew attended a religious meeting in Missouri amounts to anti-Semitic conduct.

RESPONSE NO. 28: The Administrator objects to this request for admission based on relevance.

The Administrator admitted her conduct was not bar regulation in her Answers to Admissions so how was a civil rights violation that was not relevant on November 7, 2023 by Admission of the Illinois Supreme Court suddenly relevant on February 2, 2024? The Administrator was notified of a U.S. Civil Rights complaint and the Administrator is again retaliating against Respondent. The Administrator has intentionally inflicted emotional distress and traumatized Respondent across state line by violating her religious freedom. The Administrator's conduct herein is not bar regulation it is anti-Semitism and this Administrator has a history of engaging in it, to-wit:

- a. Refusing to address Ed Burkes Jew Hate
- b. Failing to disclose a spouses ethnic hate which reflect adversely upon this Court.
- c. The Illinois Supreme Court conducted a secret governmental investigations of Jews in Missouri upon which this Court has no jurisdiction and Illinois wrongfully demanding the name of every Missouri Jew who have no connection to Illinois.
- d. In October of 2023, Public Official & Illinois Attorney Sarah Chowdhury of the Comptroller office posted on Twitter that called for the death of all Jews and that Hitler should have eradicated "all the Jews" and she openly called for all Jews to be sent to "the gas chamber." The Administrator has never charged Ms. Chowdhury and her ARDC registration shows she is still employed by Illinois Comptroller. This is more direct evidence that the Illinois Supreme Court and this Administrator condone anti-Semitic conduct against Jewish Attorneys. This Court refused to address death threats made to Respondent and by failing and refusing to enforce Court policy, rules, state and federal law, the Court and Administrator created a toxic, hostile and unsafe work environment for Respondent.

- e. From November 1-15, 2023, an ADL experiment was performed on X-Twitter in which Jewish posts were made on an account attributed to Ms. Lowery and then at least four other Illinois male attorneys who were not Jewish. Despite the posts appearing on at least five Illinois attorney accounts, the Illinois Supreme Court only targeted the Oklahoma Jewish attorney. Ms. Lowery notified the Administrator privately that she had failed the ADL Experiment, but she also offered to permanently retire. The Administrator refused the offer. The Administrator retaliated against Respondent for uncovering the Administrator's anti Semitism and she retaliated by filing a false Rule 744 Petition. This is the level of anti Semitic hate in the Illinois Bar. By way of comparison these male attorneys have more than 50 felony charges between them for raping, pillaging and plundering Illinois citizens and this Administrator never filed an interim petition for suspension against the WHITE MALES but the Administrator immediately targets a black first generation attorney and an Oklahoma retired Jewish attorney, neither of whom had any felony criminal charges pending or even a client complaint. Ms. Lowery has not even had a speeding conviction in the last 40 years let alone a client complaint. No Ms. Lowery is being targeted because she dared to complain in Illinois about discrimination, harassment, retaliation and bullying. The level of bias and discrimination in the Illinois bar regulatory system is so toxic and so discriminatory as to make the bar regulatory system in Illinois unconstitutionally impermissible. It is literally killing attorneys because the Court refuses to address the bullying and harassment.
- F. Finally there is an Instagram account attributed to an individual named Rachael M. Miller from Springfield, Illinois who routinely posts Jewish Tropes. Respondent understands the account could be anyone's and that is the point. This Administrator failed to make a reasonable inquiry as required by the Rules and Federal Communications Act. This administrator has made more than THIRTY (30) false and baseless charges against Respondent claiming it is bar regulation. It is NOT bar regulation. The Illinois Supreme Court is engaging in harassment and anti Semitism because they have a pecuniary interest in the account and as a matter of law are conflicted out of this case because of their own misconduct.

If the conduct was not Relevant when Administrator Miller answered discovery admissions on November 7, 2023, then it is not relevant on February 2, 2024 when the Administrator sought to Amend the Charge. The Administrator retaliated because Respondent filed a federal complaint about her anti Semitism with the U.S. Civil Rights Commission. The Administrator once again retaliated by filing this charge and it is being done because no legitimate bar regulation occurs when Illinois seizes Temple records of Missouri Jews and the State of Illinois has targeted Ms. Lowery because she

reported this Administrators illegal behavior across state line in violation of the Civil Rights Act. Then when Ms. Lowery compared the the State action of conducting a secret governmental investigations demanding Temple attendance records to the conduct of the German Socialist Party (Nazi) of seizing Temple records to implement the Final Solution, the Administrator charged Ms. Lowery with lying for stating the Holocaust occurred. Now the Illinois Supreme Court has targeted an ethnic Jew across state line with conduct which violates her civil rights because she objected to Illinois seizing Temple attendance records in Missouri as part of bar regulation. Ms. Lowery was an Oklahoma resident.

32. The Administrators charge is a federal hate crime and Holocaust denial. The Illinois Supreme Court issued a subpoena/letter to the Missouri Holocaust Museum demanding the attendance list of every Jew there. The State of Illinois had no legitimate reason to make the inquiry. The Administrator admitted the conduct was not relevant to bar regulation. The Auschwitz Holocaust Museum website documents the Nazi's seized Temple attendance records to implement the Final Solution. The Illinois Supreme Court Administrator did the same thing across state line and into Missouri.
33. The Administrator by this charge has engaged in a violation of the federal Civil Rights Act, no false statement occurred and the Administrator and this Court targeted Respondent because she complained about this Court and Administrators violation of her civil rights to the Department of Justice.
34. Respondent denies paragraph 34 for the above reasons.

COUNT -V
(ANNE BURKE)

35. Respondent realleges and reaffirms paragraphs 1-34.

36. The Administrator does not identify the Twitter account upon which this Tweet was posted. On November 13, 2023, Respondent was conducting an ADL experiment on anti-Semitism. The post listed in paragraph 36 was not one of the tweets. But what did occur was the Administrator targeted Respondent's 'alleged' account when the exact same tweet was placed on four white male non Jewish Illinois attorney accounts. The Administrator only targeted Respondent's 'alleged account' which was identified only as an Oklahoma attorney & a Jewish Attorney's account. Next the Administrator was aware that the Chief Justice Anne Burke's husband, Ed Burke, had made hateful comments against Illinois Jewish attorneys while he committed 13 felony counts of public corruption including extorting his own clients. The Administrator knew about his hateful Jewish Tropes since 2017 and the Administrator never took any action to protect the Illinois public. The Illinois Supreme Court Justices also knew about the criminal allegations and the Jew hate. They did not disclose the conflict of interest which was required under the Illinois Judicial Canons. Then Anne Burke ruled on Respondent's case without disclosing the conflict of interest in violation of the Illinois Judicial Canons. The Illinois Supreme Court and the Administrator condoned Ed Burke's Jew hate and they conspired to hide the anti-Semitism in Illinois from Respondent and now they are trying to blame her for their ethical failures. It was not Respondent's duty to recuse from the case, it was Anne Burke's duty to disclose the conflict and every single justice on the Court also knew about the conflict and they did not act. The dictionary defines "corruption" as a noun to mean 'dishonest or fraudulent conduct by those in power.' Failing to disclose a required conflict of interest about your spouse's Jew hate and then hearing reports on

the news that the justice was caught laughing at the hate. It doesn't matter whether she did or didn't laugh - the appearance of impropriety is the standard and this Court violated its own ethical standards.

38. A judge who fails to timely disclose a conflict of interest which was required under the rules and then withholds that information in order to save her career at the expense of Respondent's career has acted with malice or with utter indifference toward her judicial obligation of candor and fairness. This Administrator targets an Oklahoma citizen who is commenting about the Illinois problems reported on the news and about its anti-Semitism. The Administrator knows Anne Burke's husband made hateful comments against Illinois Jewish attorneys because it was part of an adjudicated federal court order and he was found guilty of 13 federal crimes. So the Oklahoma Jew is being charged for complaining about Ed and Anne Burkes Jew hate, but this Administrator never charged Ed Burke from 2017 when they were notified up through February 1, 2024 more than six weeks after he was convicted. The State of Illinois has a convicted federal felon with a law license who was never been charged by this Administrator for spewing Jew hate. But the Oklahoma Jew who is retired from Illinois has to defend charges that Ed Burkes Jew hate was a lie. This is how the State of Illinois displays fairness. It targets residents of other states who publically comment on trials. This is not bar regulation and Respondent is being targeted across state line because this Administrator has a financial interest in the outcome and it has an issue with Jews who have an opinion.

39. Respondent denies the Administrator's statement for the reasons set forth herein in paragraphs 39, 40 and 41.

COUNT VI
GLEESON

42. Respondent realleges paragraphs 1-41.

43. The Administrator does not identify what account this alleged post was made from. Since no identification has been made Respondent denies same. Next, a reading of the post clearly states the transaction was above board and there was no implication otherwise. The Administrator cannot 'make up' a meaning to a post that clearly says it was an above board transaction. Next, many years ago Respondent believes the Belleville News Democrat reported that the local Democratic Party required a specified level of 'party support' in order to even be considered for a judicial appointment. The only instance Respondent was familiar with was Roger Scrivner. As stated, Ms. Lowery wasn't a resident of Illinois since 2019 and she retired from Illinois in 2023. Respondent has no idea who represented Andrew Gleeson in his divorce and/or whether that individual got a job. If she did, great for her, but Respondent has no idea what this has to do with her.

44. Respondent has no idea whether the practice was a one time occurrence or whether it still occurs but the Administrator has not even identified the account the post was made from. Ms. Lowery is not an Illinois attorney and when she looked up this alleged account it doesn't exist. One account

appears similar on X Twitter but it is not Ms. Lowery's account and it is Margaret J. Lowery@thelowerylawfirm.

WHEREFORE, Respondent filed a Motion with this Court and prays that the foregoing Complaint be dismissed because it is wholly without merit and it is clear the Administrator is targeting Respondent in violation of state and federal law. These charges are this Court's retaliation for its own malfeasance and the witness list involves three chief justices, two justices, four administrators, the General Counsel of this Court and his staff, the Director of Equity and Inclusion, etc. which means everyone in Illinois has a conflict of interest due to bias. The Administrator has created a literal federal case trying to scapegoat Respondent.

Respectfully submitted,

THE LOWERY LAW FIRM

Margaret J. Lowery

Margaret J. Lowery, OBA #12138
7122 S. Sheridan Road, Suite 2-1100
Tulsa, OK 74133
mlowery@thelowerylawfirm.com
(918) 513-2204
(Licensed in Oklahoma Only).


PROOF OF SERVICE

The undersigned hereby certifies, that she has complied with all laws and notices the Illinois Code of Civil Procedure, 735-ILCS-5/109.

A copy of the foregoing pleadings was sent to Rachael Miller and Peter Rotskoff at their ARDC email at rmiller@iadc.org and/or protskoff@iadc.org before 5:00 p.m. on day of filing with the Clerk. -Under penalties as provided by law, the undersigned certifies that the statements set forth in this instrument are true and correct, to the best of her knowledge and belief after making a reasonable inquiry from her home in Oklahoma, and except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies that such matters are on information and belief.

Margaret J. Lowery
Margaret J. Lowery

EXHIBIT #1

You haven't connected with **Caryn Haddix, JD, MBA** 

 **Caryn Haddix, JD, MBA** (She/Her) • 1:10 pm

Wow! I'm stunned. Thank you for sharing all of this. My email is chaddix10@gmail.com. I will definitely read through what you sent here.

And you're right. It ran me out of the profession, destroyed my reputation, my credibility, stole my career. I was a single mother. Everything I had worked for was gone. This was AFTER the ARDC attorney looked me in the face and said I did nothing wrong. I was severely depressed for years after this happened and considered suicide more than once as I was humiliated. The only thing that kept me going was my son but I had to rebuild my entire life because of them. Anyway...probably more than you care to know but let me think on this.

There's nothing I would love to see more than more the system to be changed and feel some vindication for what I went through. I need to determine emotionally and mentally if I can do it.

I appreciate you reaching out and I'm sorry for what's happened to you too.

Caryn