

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

FILED  
6/27/2025 3:06 PM  
ARDC Clerk

In the Matter of:

MICHAEL JOHN BLATTNER,

Attorney-Respondent,

No. 6226627.

Commission No. 2025PR00036

COMPLAINT

Lea S. Gutierrez, Administrator of the Attorney Registration and Disciplinary Commission, by her attorney, Morgan B. Handwerker, pursuant to Supreme Court Rule 753(b), complains of Respondent, Michael John Blattner, who was licensed to practice law in Illinois on May 2, 1995, and alleges that Respondent has engaged in the following conduct which subjects Respondent to discipline pursuant to Supreme Court Rule 770:

*(Practicing Law After Removal from the Roll of Attorneys)*

1. At all times alleged in this complaint, Supreme Court Rule 794 required that, subject to certain exceptions that do not apply to Respondent in this matter, every Illinois attorney was required to complete 30 hours of continuing legal education (“CLE”) activity during the attorney’s two-year reporting period ending on June 30. For attorneys whose last names started with the letter “B”, including Respondent, the most recent two-year reporting requirement ran from July 1, 2022 through June 30, 2024.

2. Certain attorneys, including Respondent, who were required to comply with the 2022-2024 CLE reporting period were eligible to obtain a grace period extension until October 30, 2024 to complete their CLE requirements. To obtain the grace period extension, a qualifying

attorney would need to enter certain information online and pay a \$100 fee to the Minimum Continuing Legal Education Board of the Supreme Court of Illinois (“MCLE Board”) no later than July 31, 2024. On or about June 25, 2024, Respondent made a \$100 payment to the MCLE board to obtain a grace period extension.

3. Respondent has registered successfully since 1995 and therefore was familiar with the registration process, including for the entire time that the MCLE requirement has been in place since 2005.

4. At all times set forth in this complaint, Supreme Court Rule 796(e) required the Administrator to remove from the Roll of Attorneys authorized to practice law in Illinois the name of any attorney who had not complied with their CLE requirement.

5. Pursuant to Supreme Court Rule 756(h), “any person whose name is not on the master roll and who practices law or who holds himself or herself out as being authorized to practice law pursuant to the attorney's Illinois law license is engaged in the unauthorized practice of law and may also be held in contempt of the Court.”

6. Respondent received at least the following messages from the MCLE Board concerning his compliance with Supreme Court Rules 794 and 796 during the 2022-2024 MCLE reporting period:

DATE	METHOD OF CORRESPONDENCE	DESCRIPTION
January 8, 2024	E-mail	Five tips for Respondent’s first reporting period with the transcript system. The five tips were: (1) the check-the-box compliance report was gone, (2) to check Respondent’s online transcript promptly, (3) to contact the course provider if Respondent was missing a CLE course on his transcript, (4) to check the Illinois accreditation for CLE courses before you take them, and (5) applying for Illinois MCLE credit for an out of state CLE course.

February 23, 2024	E-mail	Respondent's MCLE transcript reflected zero CLE credit hours.
April 9, 2024	E-mail	Respondent's MCLE transcript reflected zero CLE credit hours.
April 29, 2024	E-mail	Reminder to comply with MCLE requirements by June 30, 2024.
May 13, 2024	Postcard	Reminder regarding deadlines for the 2022-2024 MCLE reporting period.
May 22, 2024	E-mail	Reminder to comply with MCLE requirements by June 30, 2024 and that Respondent's MCLE transcript reflected zero CLE credit hours.
June 14, 2024	E-mail	Reminder to comply with MCLE requirements by June 30, 2024 and the Respondent's MCLE transcript reflected zero CLE credit hours.
June 25, 2024	E-mail	Reminder regarding deadlines for the 2022-2024 MCLE reporting period.
June 25, 2024	E-mail	Confirmation of payment for timely non-compliance extension for CLE reporting period 2022-2024.
August 16, 2024	E-mail	Reminder regarding the grace period extension deadlines for the 2022-2024 MCLE reporting period.
September 10, 2024	E-mail	Reminder to comply with MCLE requirements by October 31, 2024 and that Respondent's MCLE transcript reflected zero CLE credit hours.
October 9, 2024	E-mail	Reminder regarding the grace period extension deadlines for the 2022-2024 MCLE reporting period.
October 24, 2024	E-mail	Reminder regarding the grace period extension deadlines for the 2022-2024 MCLE reporting period.
October 30, 2024	E-mail	Reminder regarding the grace period extension deadlines for the 2022-2024 MCLE reporting period.
November 6, 2024	E-mail	Respondent's MCLE transcript did not reflect that he completed the MCLE requirements for the 2022-2024 reporting period.
November 18, 2024	E-mail	Respondent's MCLE transcript did not reflect that he completed the MCLE requirements for the 2022-2024 reporting period by the October 31, 2024 deadline.
November 25, 2024	E-mail	Respondent's MCLE transcript did not reflect that he completed the MCLE requirements for the 2022-2024 reporting period by the October 31, 2024 deadline.
December 1, 2024	Mail via USPS	Notice of removal from the Roll of Attorneys for MCLE non-compliance pursuant to Illinois Supreme Court Rule 796(e).
December 2, 2024	E-mail	Respondent was removed and assessed a reinstatement fee because by November 30, 2024 his transcript did not reflect that he completed the 2022-2024 requirement by October 31, 2024.

December 2, 2024	E-mail	Notice of removal from the Roll of Attorneys for MCLE non-compliance pursuant to Illinois Supreme Court Rule 796(e).
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7. On or about December 1, 2024, Respondent received a notice of his removal from the Roll of Attorneys from the MCLE Board which resulted from Respondent's failure to complete the requisite CLE courses during the 2022-2024 period.

8. On December 1, 2024, the Administrator removed Respondent's name from the Roll of Attorneys authorized to practice law in Illinois based on his failure to complete the requisite CLE courses. As of December 1, 2024, and at all times described in the balance of this complaint, Respondent had actual knowledge that he had been removed from the Roll of Attorneys and that he was not authorized to provide legal services in Illinois.

9. Since being removed from the Roll of Attorneys and knowing that he was not authorized to practice law in Illinois, Respondent represented clients in no less than nine (9) matters, mainly in the area of probate law.

10. Between December 1, 2024, and the date of the filing of this complaint, Respondent appeared in court and/or drafted court orders on his clients' behalf, including in the following matters and on the following dates:

<b>NAME OF CLIENT</b>	<b>CASE NUMBER (COURT)</b>	<b>DATE OF COURT APPEARANCE(S) AND/OR COURT ORDER(S)</b>
Estate of Y.M.	2024P005608 (Circuit Court of Cook County, Probate Division)	<ul style="list-style-type: none"> <li>January 8, 2025</li> </ul>
Estate of F.D.D.	2021P008137 (Circuit Court of Cook County, Probate Division)	<ul style="list-style-type: none"> <li>January 14, 2025</li> <li>February 21, 2025</li> <li>March 24, 2025</li> </ul>
Estate of V.H.	2017P004128 (Circuit Court of Cook County, Probate Division)	<ul style="list-style-type: none"> <li>February 5, 2025</li> </ul>

Estate of M.M.	2013P004970 (Circuit Court of Cook County, Probate Division)	<ul style="list-style-type: none"> <li>February 7, 2025</li> </ul>
Estate of B.D.	2022P004230 (Circuit Court of Cook County, Probate Division)	<ul style="list-style-type: none"> <li>December 9, 2024</li> <li>February 4, 2025</li> <li>April 2, 2025</li> </ul>
Estate of J.F.	2025PR000059 (Circuit Court of Kane County)	<ul style="list-style-type: none"> <li>March 6, 2025</li> <li>April 4, 2025</li> </ul>

11. Between December 1, 2024, and the date of the filing of this complaint, Respondent filed documents with the court on his clients' behalf, including in the following matters and on the following dates:

<b>NAME OF CLIENT</b>	<b>CASE NUMBER (COURT)</b>	<b>DATE OF FILING(S)</b>	<b>TITLE OF FILING(S)</b>
J.G. Special Needs Trust	2024P004458 (Circuit Court of Cook County, Probate Division)	February 21, 2025	Amended Petition for Approval of Annual Budget For Expenditure of Trust Funds and Authority to Expend Trust Funds
J.G. Special Needs Trust	2024P004458 (Circuit Court of Cook County, Probate Division)	February 24, 2025	Notice of Filing of Amended Petition for Approval of Annual Budget For Expenditure of Trust Funds and Authority to Expend Trust Funds
J.G. Special Needs Trust	2024P004458 (Circuit Court of Cook County, Probate Division)	March 5, 2025	Second Amended Petition for Approval of Annual Budget for Expenditure of Trust Funds and Authority to Expend Trust Funds and Notice of Petition of Second Amended Petition for Approval of Annual Budget for Expenditure of Trust Funds and Authority to Expend Trust Funds
Estate of K.J.	2024P005403 (Circuit Court of Cook County, Probate Division)	Dec. 30, 2024	Oath and Bond of Representative- Surety
Estate of K.J.	2024P005403 (Circuit Court of Cook County, Probate Division)	February 19, 2025	Amended Petition to Settle Cause of Action- Wrongful Death

Estate of K.J.	2024P005403 (Circuit Court of Cook County, Probate Division)	February 21, 2025	Notice of Petition to Amended Petition to Settle Cause of Action- Wrongful Death
Estate of B.M.	2024P005611 (Circuit Court of Cook County, Probate Division)	February 24, 2025	Notice of Entry of Order
Estate of B.M.	2024P005611 (Circuit Court of Cook County, Probate Division)	February 25, 2025	Oath and Bond of Representative – No Surety
Estate of B.M.	2024P005611 (Circuit Court of Cook County, Probate Division)	February 25, 2025	Oath and Bond of Representative – No Surety
Estate of Y.M.	2024P005608 (Circuit Court of Cook County, Probate Division)	February 24, 2025	Notice of Entry of Order
Estate of Y.M.	2024P005608 (Circuit Court of Cook County, Probate Division)	February 25, 2025	Oath and Bond of Representative – No Surety
Estate of Y.M.	2024P005608 (Circuit Court of Cook County, Probate Division)	February 25, 2025	Oath and Bond of Representative – No Surety
Estate of B.D.	2022P004230 (Circuit Court of Cook County, Probate Division)	February 3, 2025	Petition to Settle Cause of Action – Minor’s Estate
Estate of B.D.	2022P004230 (Circuit Court of Cook County, Probate Division)	February 4, 2025	Oath and Bond of Representative - Surety
Estate of B.D.	2022P004230 (Circuit Court of Cook County, Probate Division)	April 1, 2025	Amended Petition to Settle Cause of Action – Minor’s Estate
Estate of J.F.	2025PR000059 (Circuit Court of Kane County)	February 6, 2025	Petition for Letters of Administration – Intestate Estate
Estate of J.F.	2025PR000059 (Circuit Court of Kane County)	February 26, 2025	Affidavit of Heirship
Estate of J.F.	2025PR000059 (Circuit Court of Kane County)	March 6, 2025	Order Appointing Administration
Estate of J.F.	2025PR000059 (Circuit Court of Kane County)	March 6, 2025	Order Declaring Heirship
Estate of J.F.	2025PR000059 (Circuit Court of Kane County)	March 7, 2025	Letters of Office Decedent’s Estate

12. At no time between December 1, 2024 and at least May 7, 2025, did Respondent complete the requisite CLE requirements, nor had he been restored to the Roll of Attorneys.

During that period, pursuant to Rule 796(e), Respondent was not authorized to practice law in Illinois or to hold himself out as so authorized.

13. During the period in which Respondent was removed from the Roll of Attorneys, Respondent failed to notify all of his clients, opposing counsel, and judges presiding over the matters listed above, that he was not authorized to practice law in Illinois.

14. By appearing in court and filing documents, Respondent misrepresented to judges, opposing counsel, his clients, and others that he was authorized to practice law, despite knowing he was not.

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

- a. practicing law in a jurisdiction in violation of the regulation of the legal profession in that jurisdiction, by conduct including appearing in court on a client's behalf, filing and documents with the court on client matters while his name had been removed from the Roll of Attorneys and he was not authorized to practice law, in violation of Rule 5.5(a) of the Illinois Rules of Professional Conduct (2010);
- b. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including knowingly holding himself out as being able to practice law although unauthorized to do so, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010); and
- c. conduct that is prejudicial to the administration of justice, by conduct including holding himself out as authorized to practice law to clients, opposing counsel and the court when he was not so authorized, in violation of Rule 8.4(d) of the Illinois Rules of Professional Conduct (2010).

WHEREFORE, the Administrator respectfully requests that this matter be assigned to a panel of the Hearing Board, that a hearing be held, and that the panel make findings of fact and law, and a recommendation for such discipline as is warranted.

Respectfully submitted,

Lea S. Gutierrez, Administrator  
Attorney Registration and  
Disciplinary Commission

By: /s/ Morgan B. Handwerker  
Morgan B. Handwerker

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