

FILED 8:00
2/14/2022 ~~12:00~~ AM
ARDC Clerk

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

In the Matter of:

MATTHEW RYAN MCCORMICK,

Attorney-Respondent,

No. 6335297

Commission No. 2021PR00098

ANSWER TO COMPLAINT

NOW COMES MATTHEW RYAN MCCORMICK, by his attorney, Carl R. Draper, and pursuant to Supreme Court Rule 753, provides his Answer to the Complaint as follows:

ALLEGATIONS COMMON TO ALL COUNTS

1. Respondent was admitted to practice law in Missouri in 2017 and admitted to practice law in Alabama in 2018. Respondent was admitted to practice law in the United States District Court, Southern District of Illinois on August 13, 2020. He was admitted to practice law in the United States District Court, Central District of Illinois on August 18, 2020.

ANSWER: Respondent admits the allegations of this paragraph.

2. Respondent was employed as a salaried associate at the Dent Law Offices ("Dent firm") from August 1, 2020 to July 21, 2021. On August 1, 2020, there were two other attorneys at the Dent firm, Kaye Dent and Roy Dent, III. Roy Dent retired from the practice of law on February 26, 2021.

ANSWER: Respondent admits the allegations of this paragraph.

COUNT I

(Lack of communication, lack of diligence and dishonesty – client Christian Schalburg)

3. On or about July 15, 2019, the Dent firm and Christian Schalburg (“Schalburg”) agreed that the Dent firm would represent Schalburg in a Chapter 7 bankruptcy case.

ANSWER: Respondent has insufficient knowledge to admit or deny the allegations of this paragraph.

4. On or about March 16, 2021, the Dent firm assigned Schalburg’s matter to Respondent.

ANSWER: Respondent admits the allegations of this paragraph.

5. At no time did Respondent file a bankruptcy petition on behalf of Schalburg.

ANSWER: Respondent admits the allegations of this paragraph.

6. On or about June 23, 2021, Respondent represented to Schalburg and Kaye Dent that Schalburg’s bankruptcy petition had been filed.

ANSWER: Respondent admits the allegations of this paragraph.

7. Respondent’s statements to Schalburg and Kaye Dent described in paragraph 6, above, were false because Respondent never filed a bankruptcy petition on behalf of Schalburg.

ANSWER: Respondent admits the allegations of this paragraph.

8. At the time Respondent made the statements to Schalburg and Kaye Dent described in paragraph 6, above, he knew the statements were false.

ANSWER: Respondent admits the allegations of this paragraph.

9. On various occasions between June 23, 2021 and July 22, 2021, Schalburg called or emailed Respondent to check the status of his bankruptcy case.

ANSWER: Respondent admits the allegations of this paragraph.

10. On many occasions, Respondent did not respond to Schalburg's telephone and email messages.

ANSWER: Respondent admits that on occasions he did not response to Schalburg's telephone and email messages. He does not know how often that happened.

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

a. failure to act with reasonable diligence and promptness in representing a client by conduct including failing to file a bankruptcy petition on behalf of Schalburg in violation of Rule 1.3 of the Illinois Rules of Professional Conduct (2010);

ANSWER: Respondent admits the allegations of this paragraph.

b. failure to promptly comply with reasonable requests for information by conduct including failing to return Schalburg's telephone and email messages in violation of Rule 1.4(a)(4) of the Illinois Rules of Professional Conduct (2010);

ANSWER: Respondent admits the allegations of this paragraph.

c. failure to keep the client reasonably informed about the status of the matter by conduct including failing to respond to Schalburg's requests for information about the status of the bankruptcy case in violation of Rule 1.4(a)(3) of the Illinois Rules of Professional Conduct (2010); and

ANSWER: Respondent admits the allegations of this paragraph.

d. conduct including dishonesty, fraud, deceit or misrepresentation by conduct including falsely representing to Schalburg and Kaye Dent that he had filed Schalburg's bankruptcy petition, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

ANSWER: Respondent admits the allegations of this paragraph.

COUNT II
(Lack of diligence and dishonesty – client Angela Crooker)

12. On or about March 4, 2021, the Dent firm and Angela Crooker ("Crooker") agreed that the Dent firm would represent Crooker in filing a Chapter 7 bankruptcy case.

ANSWER: Respondent admits the allegations of this paragraph.

13. On or about March 9, 2021, the Dent firm assigned Crooker's bankruptcy case to Respondent.

ANSWER: Respondent admits the allegations of this paragraph.

14. At no time did Respondent file a bankruptcy petition on behalf of Crooker.

ANSWER: Respondent admits the allegations of this paragraph.

15. Between March 9, 2021 and July 6, 2021, Kaye Dent asked Respondent about the status of Crooker's bankruptcy matter. On more than one occasion, Respondent represented to Kaye Dent that Crooker had disappeared and he was unable to file the bankruptcy petition without Crooker's assistance.

ANSWER: Respondent does not recall and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

16. Respondent's statements to Kaye Dent described in paragraph 15, above, were false because Crooker had not disappeared and was available to consult with Respondent.

ANSWER: Respondent does not recall and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

17. At the time Respondent made the statements to Kaye Dent described in paragraph 15, above, he knew the statements were false.

ANSWER: Respondent does not recall and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

18. In July 2021, Crooker appeared in person at the Dent firm to check on the status of her bankruptcy case and she met with Respondent at that time.

ANSWER: Respondent admits the allegations of this paragraph.

19. During the meeting with Crooker, Respondent represented to Crooker that her bankruptcy petition had been filed in June and he was waiting for a date for the "341" creditors meeting."

ANSWER: Respondent admits the allegations of this paragraph.

20. Respondent's statements in paragraph 19, above, were false because Respondent had not filed a bankruptcy petition on behalf of Crooker and no creditor's meeting could have been scheduled.

ANSWER: Respondent admits the allegations of this paragraph.

21. At the time Respondent made the statements to Crooker described in paragraph 19, above, Respondent knew the statements were false.

ANSWER: Respondent admits the allegations of this paragraph.

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

a. failure to act with reasonable diligence and promptness in representing a client by conduct including failing to file a bankruptcy petition on behalf of Crooker in violation of Rule 1.3 of the Illinois Rules of Professional Conduct (2010); and

ANSWER: Respondent admits the allegations of this paragraph.

b. conduct including dishonesty, fraud, deceit or misrepresentation by conduct including making false statements to Kaye Dent and Crooker as described in paragraphs 15 and 19, above, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

ANSWER: Respondent admits the allegations of this paragraph.

COUNT III
(Lack of diligence and dishonesty – client Larry Harvel)

23. In or about November 2019, the Dent firm and Larry Harvel (“Harvel”) agreed that the Dent firm would represent Harvel in a Chapter 12 bankruptcy case.

ANSWER: Respondent does not recall and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

24. On December 5, 2019, the Dent firm filed a bankruptcy petition on behalf of Harvel. The case was docketed as Debtor Harvel Farms Inc., case 19-60449, U.S. Bankruptcy Court, Southern District of Illinois.

ANSWER: Respondent does not recall and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

25. On February 26, 2021, the Dent firm assigned Harvel's case to Respondent.

ANSWER: Respondent admits the allegations of this paragraph.

26. On May 12, 2021, the court in case 19-60449 ordered Respondent to file an accounting on or before June 11, 2021.

ANSWER: Respondent admits the allegations of this paragraph.

27. At no time between May 12, 2021 and July 14, 2021 did Respondent file an accounting in case 19-60449.

ANSWER: Respondent admits the allegations of this paragraph.

28. On or about June 11, 2021, Respondent represented to Kaye Dent that he had filed the accounting in case 19-60449.

ANSWER: Respondent admits the allegations of this paragraph.

29. Respondent's statement to Kaye Dent described in paragraph 28, above, was false because Respondent never filed an accounting in case 19-60449 following the court's order on May 12, 2021.

ANSWER: Respondent admits the allegations of this paragraph.

30. At the time Respondent made the statement described in paragraph 28, above, he knew the statement was false.

ANSWER: Respondent admits the allegations of this paragraph.

31. On July 14, 2021, the court in case 19-60449 ordered Respondent to file an accounting by August 13, 2021 or face possible sanctions.

ANSWER: Respondent admits the allegations of this paragraph.

32. On or about July 21, 2021, Respondent represented to Kaye Dent that he was working with Harvel on the accounting and he had "much of it finished."

ANSWER: Respondent does not recall and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

33. Respondent's statements described in paragraph 32, above, were false because Respondent had not worked with Harvel on the accounting and he had not completed much of the work on the accounting.

ANSWER: Respondent does not recall and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

34. Respondent knew that his statements described in paragraph 32, above, were false at the time he made them.

ANSWER: Respondent does not recall and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

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

a. failure to act with reasonable diligence and promptness in representing a client by conduct including failing to file an accounting in case 19-60449 on behalf of Harvel in violation of Rule 1.3 of the Illinois Rules of Professional Conduct (2010); and

ANSWER: Respondent admits the allegations of this paragraph.

b. conduct including dishonesty, fraud, deceit or misrepresentation by conduct including making false statements to Kaye Dent as described in paragraphs 28 and 32, above, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

ANSWER: Respondent does not recall his statements and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

COUNT IV

(Lack of diligence and dishonesty – clients John and Alexis Tutza)

36. On or about March 25, 2021, the Dent firm and John and Alexis Tutza (“Tutzas”) agreed that the Dent firm would represent them in a Chapter 7 bankruptcy.

ANSWER: Respondent admits the allegations of this paragraph.

37. On March 22, 2021, the Dent firm assigned Tutzas' matter to Respondent.

ANSWER: Respondent admits the allegations of this paragraph.

38. On June 7, 2021, the Tutzas met with Respondent and signed the bankruptcy schedules that are filed with the bankruptcy petition.

ANSWER: Respondent admits the allegations of this paragraph.

39. At no time on or after June 7, 2021, did Respondent file a bankruptcy petition on behalf of the Tutzas.

ANSWER: Respondent admits the allegations of this paragraph.

40. On or about June 11, 2021, Respondent entered a calendar event on the Dent firm's electronic calendar showing that a "341" creditors' meeting had been scheduled for June 25, 2021, in Tutzas' bankruptcy case.

ANSWER: Respondent admits the allegations of this paragraph.

41. The calendar event described in paragraph 40, above, was false because no bankruptcy petition had been filed on behalf of the Tutzas and no creditors meeting had been scheduled.

ANSWER: Respondent admits the allegations of this paragraph.

42. At the time Respondent made the calendar event described in paragraph 40, above, he knew it was false.

ANSWER: Respondent admits the allegations of this paragraph.

43. Respondent made the calendar entry in order to mislead Kaye Dent into believing that the Tutzas' bankruptcy had been filed.

ANSWER: Respondent admits the allegations of this paragraph.

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

a. failure to act with reasonable diligence and promptness in representing a client by conduct including failing to file a bankruptcy petition on behalf of the Tutzas, in violation of Rule 1.3 of the Illinois Rules of Professional Conduct (2010); and

ANSWER: Respondent admits the allegations of this paragraph.

b. conduct including dishonesty, fraud, deceit or misrepresentation by conduct including making a false calendar entry purportedly showing that a creditors meeting had been scheduled in the Tutzas' bankruptcy case, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct. (2010).

ANSWER: Respondent admits the allegations of this paragraph.

COUNT V

(Lack of diligence and dishonesty – clients Mark and Leann Sarchet)

45. On or about April 13, 2021, the Dent firm and Mark and Leann Sarchet ("Sarchets") agreed that the Dent firm would represent the Sarchets in a Chapter 7 bankruptcy case.

ANSWER: Respondent admits the allegations of this paragraph.

46. On or about March 2, 2021, the Dent firm assigned the Sarchets' matter to Respondent.

ANSWER: Respondent admits the allegations of this paragraph.

47. On or about April 13, 2021, the Sarchets met with Respondent at the Dent firm and Respondent assured them that their bankruptcy petition would be filed shortly after their meeting.

ANSWER: Respondent admits the allegations of this paragraph.

48. At no time on or after April 13, 2021, did Respondent file a bankruptcy petition on behalf of the Sarchets.

ANSWER: Respondent admits the allegations of this paragraph.

49. On or about April 13, 2021, Respondent represented to Kaye Dent that the Sarchets' bankruptcy petition and schedules had been filed.

ANSWER: Respondent admits the allegations of this paragraph.

50. Respondent's statement in paragraph 49, above, was false because Respondent had not filed a bankruptcy petition on behalf of the Sarchets.

ANSWER: Respondent admits the allegations of this paragraph.

51. At the time Respondent made the statement in paragraph 49, above, he knew the statement was false.

ANSWER: Respondent admits the allegations of this paragraph.

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

- a. failure to act with reasonable diligence and promptness in representing a client by conduct including failing to file a bankruptcy petition on behalf of the Sarchets, in violation of Rule 1.3 of the Illinois Rules of Professional Conduct (2010); and

ANSWER: Respondent admits the allegations of this paragraph.

- b. conduct including dishonesty, fraud, deceit or misrepresentation by conduct including falsely representing to Kaye Dent that he had filed a bankruptcy petition on behalf of the Sarchets, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

ANSWER: Respondent admits the allegations of this paragraph.

COUNT VI
(Dishonesty – client Melissa Nunamaker)

53. On or about June 28, 2021, the Dent firm and Melissa Nunamaker (“Nunamaker”) agreed that the Dent firm would represent Nunamaker in a Chapter 7 bankruptcy case, and the Dent firm assigned the matter to Respondent at that time.

ANSWER: Respondent admits the allegations of this paragraph.

54. At no time did Respondent file a bankruptcy petition on behalf of Nunamaker.

ANSWER: Respondent admits the allegations of this paragraph.

55. On or about June 28, 2021, Respondent represented to Nunamaker that her bankruptcy petition had been filed.

ANSWER: Respondent does not recall and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

56. Respondent's statement in paragraph 55, above, was false because he never filed a bankruptcy petition on Nunamaker's behalf.

ANSWER: Respondent does not recall and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

57. At the time Respondent made the statement in paragraph 55, above, he knew his statement to Nunamaker was false.

ANSWER: Respondent does not recall and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

58. After June 28, 2021, Respondent represented to Kaye Dent that Nunamaker's bankruptcy petition had been filed.

ANSWER: Respondent does not recall and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

59. Respondent's statement in paragraph 58, above, was false because Respondent never filed a bankruptcy petition on behalf of Nunamaker.

ANSWER: Respondent does not recall and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

60. At the time Respondent made the statement in paragraph 58, above, he knew his statement to Kaye Dent was false.

ANSWER: Respondent does not recall such conversation and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

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

- a. conduct including dishonesty, fraud, deceit or misrepresentation by conduct including making the false statements to Nunamaker and Kaye Dent described in paragraphs 55 and 58, above, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

ANSWER: Respondent does not recall such conversations and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

COUNT VII
(Lack of diligence and dishonesty – client Brian Marley)

62. On or about September 20, 2019, the Dent firm and Brian Marley (“Marley”) agreed that the Dent firm would represent Marley in a Chapter 13 bankruptcy.

ANSWER: Respondent does not recall and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

63. On or about February 26, 2021, the Dent firm assigned Marley’s matter to Respondent.

ANSWER: Respondent admits the allegations of this paragraph.

64. On or before March 23, 2021, Marley and Respondent discussed a pending settlement in a workers' compensation case previously filed by Marley. At that time, Respondent agreed to file the necessary documents in the Chapter 13 bankruptcy to alert the trustee and the court of the pending workers' compensation settlement.

ANSWER: Respondent admits the allegations of this paragraph.

65. At no time did Respondent file any documents related to Marley's workers' compensation settlement in his bankruptcy case.

ANSWER: Respondent admits the allegations of this paragraph.

66. On or about June 3, 2021, Respondent emailed Marley and represented to him that he had filed the necessary documents in the bankruptcy case with regard to the workers' compensation settlement.

ANSWER: Respondent admits the allegations of this paragraph.

67. Respondent's statement in the email described in paragraph 66, above, was false because Respondent had not filed documents in the bankruptcy case related to the workers' compensation settlement.

ANSWER: Respondent admits the allegations of this paragraph.

68. At the time Respondent sent the email to Marley described in paragraph 66, above, he knew the statement in the email was false.

ANSWER: Respondent admits the allegations of this paragraph.

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

- a. failure to act with reasonable diligence and promptness in representing a client by conduct including failing to file documents in the bankruptcy court related to Marley's workers' compensation settlement, in violation of Rule 1.3 of the Illinois Rules of Professional Conduct (2010); and

ANSWER: Respondent admits the allegations of this paragraph.

- b. conduct involving dishonesty, fraud, deceit or misrepresentation by conduct including sending a false email to Marley as described in paragraph 66, above, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

ANSWER: Respondent admits the allegations of this paragraph.

COUNT VIII
(Failure to communicate and dishonesty – client Rebecca Hopgood)

70. On or about May 24, 2021, the Dent firm and Rebecca Hopgood ("Hopgood") agreed that the Dent firm would represent her as the debtor in an IRS collection matter and Respondent agreed to represent Hopgood on behalf of the firm.

ANSWER: Respondent admits the allegations of this paragraph.

71. At no time did Respondent communicate with the IRS about Hopgood's matter or take any steps to follow-up on the payment plan Hopgood had previously submitted to the IRS.

ANSWER: Respondent does not recall and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

72. On various occasions between June 2, 2021 and July 21, 2021, Hopgood emailed Respondent about the IRS matter and requested status concerning a possible payment plan.

ANSWER: Respondent admits the allegations of this paragraph.

73. On many occasions, Respondent did not respond to Hopgood's emails.

ANSWER: Respondent admits the allegations of this paragraph.

74. On or about July 21, 2021, Respondent represented to Hopgood that he had spoken to an IRS agent about her debt and her proposed payment plan and the agent said they were reviewing the matter and they would get back to Respondent within 30 days.

ANSWER: Respondent does not recall and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

75. Respondent's statements to Hopgood set forth in paragraph 74, above, were false because Respondent never spoke to an IRS agent about Hopgood's case.

ANSWER: Respondent does not recall and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

76. At the time Respondent made the statements to Hopgood described in paragraph 74, above, he knew the statements were false.

ANSWER: Respondent does not recall and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

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

- a. failure to act with reasonable diligence and promptness in representing a client by conduct including failing to contact the IRS about the Hopgood matter, in violation of Rule 1.3 of the Illinois Rules of Professional Conduct (2010);

ANSWER: Respondent does not recall and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

- b. failure to promptly comply with reasonable requests for information by conduct including failing to respond to Hopgood's emails requesting the status of her matter with the IRS, in violation of Rule 1.4(a)(4) of the Illinois Rules of Professional Conduct (2010); and

ANSWER: Respondent admits the allegations of this paragraph.

- c. conduct including dishonesty, fraud, deceit, or misrepresentation by conduct including sending a false email to Hopgood as described in paragraph 74, above, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

ANSWER: Respondent does not recall and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

COUNT IX

(Failure to adequately communicate – clients J.C. and Beverly Marshall)

78. In or about August 2019, the Dent firm and J.C. and Beverly Marshall ("Marshalls") agreed that the Dent firm would represent the Marshalls in defending three collection suits filed against them.

ANSWER: Respondent does not recall and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

79. On December 7, 2020, the Dent firm assigned the Marshalls cases to Respondent.

ANSWER: Respondent admits the allegations of this paragraph.

80. In one of the collection cases, Citibank NA vs. Beverly E. Marshall, case number 2018LM25, filed in Effingham County, the court had scheduled a bench trial for August 5, 2021.

ANSWER: Respondent admits the allegations of this paragraph.

81. At no time did Respondent inform the Marshalls or Kaye Dent of the August 5, 2021 court date in case number 2018LM25.

ANSWER: Respondent admits the allegations of this paragraph.

82. On various occasions between April 28, 2021 and August 1, 2021, the Marshalls called Respondent and left messages requesting the status of the collection cases.

ANSWER: Respondent does not recall and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

83. At no time did Respondent return the Marshalls' messages or provide them with an update as to the status of the collection cases.

ANSWER: Respondent admits the allegations of this paragraph.

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

- a. failure to promptly comply with reasonable requests for information by conduct including failing to return phone messages left by the Marshalls, in violation of Rule 1.4(a)(4) of the Illinois Rules of Professional Conduct (2010); and

ANSWER: Respondent does not recall and therefore has insufficient knowledge to admit or deny the allegations of this paragraph.

- b. failure to keep the client reasonably informed about the status of the matter by conduct including failing to notify the Marshalls about the bench trial scheduled in case number 2018LM25, in violation of Rule 1.4(a)(3) of the Illinois Rules of Professional Conduct (2010).

ANSWER: Respondent admits the allegations of this paragraph.

Respectfully,

MATTHEW RYAN MCCORMICK,
Attorney-Respondent,

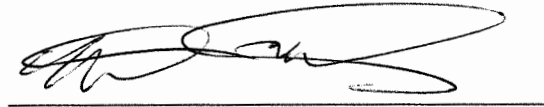
By: /s/ Carl R. Draper
Carl R. Draper, #03128847
FELDMANWASSER
1307 South Seventh Street
Springfield, IL 62703
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VERIFICATION

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 the attached instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters as the undersigned certifies as aforesaid that he/she verily believes the same to be true. The undersigned further states that his answers to certain allegations concern matters for which he has not present memory and as to those he has truthfully stated that he is unable to admit or deny such allegations.

DATED:

2/1/2022

A handwritten signature in black ink, appearing to be "R. J. [unclear]", written over a horizontal line.

CERTIFICATE OF SERVICE

The undersigned of FeldmanWasser hereby certifies that a copy of the foregoing document was served upon each of the addressees hereinafter set forth by email and by enclosing the same in an envelope plainly addressed to each of the said addresses, with postage fully prepaid, and depositing same in a U.S. Mail Box in Springfield, Illinois on this 11th day of February, 2022:

protskoff@iardc.org
ARDCeService@iardc.org

Peter L. Rotskoff
Counsel for Administrator
ARDC
3161 W White Oaks Dr., Suite 301
Springfield, IL 62704

and that the original was filed with the Clerk of the Court in which said cause is pending through the Odyssey File & Serve system.

/s/ Carl R. Draper
Carl R. Draper, #03128847