

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

In the Matter of:)
)
 CIERRA RANDAZZO-SCOTT,)
)
 Respondent.)
)
 Commission No. 2024PR00049

COMPLAINT

Lea S. Gutierrez, Administrator of the Attorney Registration and Disciplinary Commission (“ARDC”), by her attorney, Tammy L. Evans, pursuant to Supreme Court Rules 779(a) and 753, complains of Respondent, Cierra Randazzo-Scott, who has never been licensed to practice law in Illinois, but was licensed in the State of Missouri on December 7, 2021, and alleges that Respondent has engaged in the following conduct which subjects Respondent to discipline pursuant to Supreme Court Rules 770 and 779(a) and Rule 8.5(a) of the Illinois Rules of Professional Conduct:

ALLEGATIONS COMMON TO ALL COUNTS

1. On December 7, 2021, Respondent was licensed in Missouri.
2. Illinois Supreme Court Rule 707 permits an out-of-state attorney to appear as counsel and provide legal services in an Illinois proceeding without order of the tribunal upon the filing of a verified statement and the filing of an appearance of an active status Illinois attorney associated with the out-of-state attorney in the proceeding.
3. Pursuant to Rule 707(b)(1), an out-of-state attorney is eligible for permission to appear under the rule if the attorney is admitted to practice law without limitation and is authorized to practice law in another state of the United States and is not prohibited from practice in any jurisdiction by reason of discipline, resignation with charges pending, or permanent retirement.

FILED
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 ARDC Clerk

As set forth in Rule 707(c)(1), proceedings that require permission under this rule include cases before a court of the State of Illinois.

4. Pursuant to Rule 707(d), the out-of-state attorney shall serve the verified statement upon the Administrator of the ARDC, the Illinois counsel with whom the out-of-state attorney is associated in the proceeding, the attorney's client, and all parties to the proceeding entitled to notice. Additionally, the out-of-state attorney's verified statement must include certain information, including, but not limited to, a listing of all proceedings in which the attorney has filed an appearance pursuant to Rule 707 in the calendar year in which the statement is filed, the full name, business address and ARDC number of the Illinois attorney with whom the out-of-state attorney has associated in the matter, and a certificate of service of the statement upon all entitled to service under Rule 707.

COUNT I
(Dishonesty and Making a False Verified Statement to the ARDC – A.G.)

5. On or about February 18, 2022, Respondent submitted a verified statement of out-of-state attorney to the Administrator of the ARDC pursuant to Supreme Court Rule 707. In her verified statement, Respondent stated that she represented A.G. in St. Clair County case numbers 2021CF190501 and 2021DT590, and that she had not been assigned an ARDC registration number.

6. In paragraph eight of her verified statement, Respondent listed Joslyn Anthony Sandifer ("Sandifer") as the active status Illinois attorney with whom she was associated in case numbers 2021CF190501 and 2021DT590.

7. Respondent's statement that Sandifer was the active status Illinois attorney with whom she was associated in case numbers 2021CF190501 and 2021DT590 was false because

Sandifer had not agreed to appear as the active status Illinois attorney nor had Sandifer filed an appearance in case numbers 2021CF190501 and 2021DT590 as required by Rule 707.

8. Respondent knew that the statement in paragraph eight of her verified statement was false at the time she submitted the verified statement to the ARDC.

9. In paragraph nine of her verified statement, Respondent certified that she had served the verified statement on Sandifer.

10. Respondent's statement that she had served the verified statement on Sandifer was false because Respondent never served the verified statement on Sandifer in case numbers 2021CF190501 and 2021DT590.

11. Respondent knew that the statement in paragraph nine of her verified statement was false at the time she submitted the verified statement to the ARDC.

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

a. making a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer, by conduct including making false statements in paragraphs eight and nine of the verified statement that she submitted to the ARDC pursuant to Illinois Supreme Court Rule 707 in relation to her representation of A.G. in St. Clair County case numbers 2021CF190501 and 2021DT590, in violation of Rule 3.3(a)(1) of the Illinois Rules of Professional Conduct (2010);

b. knowingly making a false statement of material fact in connection with a bar admission application or a disciplinary matter, by conduct including, making false statements in paragraphs eight and nine of the verified statement that she submitted to the ARDC pursuant to Illinois Supreme Court Rule 707 in relation to her representation of A.G. in St. Clair County case numbers 2021CF190501 and 2021DT590, in violation of Rule 8.1(a) of the Illinois Rules of Professional Conduct (2010); and

c. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including submitting a verified statement to the ARDC Administrator in which Respondent falsely stated that Sandifer was the active status Illinois attorney with whom she was associated in St. Clair County case numbers 2021CF190501 and 2021DT590, and falsely certified that she had served the verified statement on Sandifer; in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

COUNT II

(Dishonesty and Making a False Verified Statement to the ARDC – B.M.)

13. On or about February 24, 2022, Respondent submitted a verified statement of out-of-state attorney to the Administrator of the ARDC pursuant to Supreme Court Rule 707. In her verified statement, Respondent stated that she represented B.M. in St. Clair County case number 2020F535, and that she had been assigned ARDC registration number 6340404.

14. In paragraph eight of her verified statement, Respondent listed Sandifer as the active status Illinois attorney with whom she was associated in case number 2020F535.

15. Respondent's statement that Sandifer was the active status Illinois attorney with whom she was associated in case number 2020F535 was false because Sandifer had not agreed to appear as the active status Illinois attorney nor had Sandifer filed an appearance in case number 2020F535 as required by Rule 707.

16. Respondent knew that the statement in paragraph eight of her verified statement was false at the time she submitted the verified statement to the ARDC.

17. In paragraph nine of her verified statement, Respondent certified that she had served the verified statement on Sandifer.

18. Respondent's statement that she had served the verified statement on Sandifer was false because Respondent never served the verified statement on Sandifer in case number 2020F535.

19. Respondent knew that the statement in paragraph nine of her verified statement was false at the time she submitted the verified statement to the ARDC.

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

- a. making a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer, by conduct including making false statements in paragraphs eight and nine of the verified statement that she submitted to the ARDC pursuant to Illinois Supreme Court Rule 707 in relation to her representation of B.M. in St. Clair County case number 2020F535, in violation of Rule 3.3(a)(1) of the Illinois Rules of Professional Conduct (2010);
- b. knowingly making a false statement of material fact in connection with a bar admission application or a disciplinary matter, by conduct including, making false statements in paragraphs eight and nine of the verified statement that she submitted to the ARDC pursuant to Illinois Supreme Court Rule 707 in relation to her representation of B.M. in St. Clair County case number 2020F535, in violation of Rule 8.1(a) of the Illinois Rules of Professional Conduct (2010); and
- c. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including submitting a verified statement to the ARDC Administrator in which Respondent falsely stated that Sandifer was the active status Illinois attorney with whom she was associated in St. Clair County case number 2020F535, and falsely certified that she served the verified statement on Sandifer; in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

COUNT III

(Dishonesty and Making a False Verified Statement to the ARDC – C.S.)

21. On or about June 1, 2022, Respondent submitted a verified statement of out-of-state attorney to the Administrator of the ARDC pursuant to Supreme Court Rule 707. In her verified

statement, Respondent stated that she represented C.S. in St. Clair County case number 2014F990, and that she had been assigned ARDC registration number 6340404.

22. In paragraph eight of her verified statement, Respondent listed Sandifer as the active status Illinois attorney with whom she was associated in case number 2014F990.

23. Respondent's statement that Sandifer was the active status Illinois attorney with whom she was associated in case number 2014F990 was false because Sandifer had not agreed to appear as the active status Illinois attorney nor had Sandifer filed an appearance in case number 2014F990 as required by Rule 707.

24. Respondent knew that the statement in paragraph eight of her verified statement was false at the time she submitted the verified statement to the ARDC.

25. In paragraph nine of her verified statement, Respondent certified that she had served the verified statement on Sandifer.

26. Respondent's statement that she had served the verified statement on Sandifer was false because Respondent never served the verified statement on Sandifer in case number 2014F990.

27. Respondent knew that the statement in paragraph nine of her verified statement was false at the time she submitted the verified statement to the ARDC.

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

- a. making a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer, by conduct including making false statements in paragraphs eight and nine of the verified statement that she submitted to the ARDC pursuant to Illinois Supreme Court Rule 707 in relation to her representation of C.S. in St. Clair County case number

2014F990, in violation of Rule 3.3(a)(1) of the Illinois Rules of Professional Conduct (2010);

- b. knowingly making a false statement of material fact in connection with a bar admission application or a disciplinary matter, by conduct including, making false statements in paragraphs eight and nine of the verified statement that she submitted to the ARDC pursuant to Illinois Supreme Court Rule 707 in relation to her representation of C.S. in St. Clair County case number 2014F990, in violation of Rule 8.1(a) of the Illinois Rules of Professional Conduct (2010); and
- c. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including submitting a verified statement to the ARDC Administrator in which Respondent falsely stated that Sandifer was the active status Illinois attorney with whom she was associated in St. Clair County case number 2014F990, and falsely certified that she served the verified statement on Sandifer; in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

COUNT IV

(Dishonesty and Making a False Verified Statement to the ARDC – D.W.)

29. On or about July 8, 2022, Respondent submitted a verified statement of out-of-state attorney to the Administrator of the ARDC pursuant to Supreme Court Rule 707. In her verified statement, Respondent stated that she represented D.W. in St. Clair County case number 2022FA208, and that she had been assigned ARDC registration number 6340404.

30. In paragraph eight of her verified statement, Respondent listed Sandifer as the active status Illinois attorney with whom she was associated in case number 2022FA208.

31. Respondent's statement that Sandifer was the active status Illinois attorney with whom she was associated in case number 2022FA208 was false because Sandifer had not agreed to appear as the active status Illinois attorney nor had Sandifer filed an appearance in case number 2022FA208 as required by Rule 707.

32. Respondent knew that the statement in paragraph eight of her verified statement was false at the time she submitted the verified statement to the ARDC.

33. In paragraph nine of her verified statement, Respondent certified that she had served the verified statement on Sandifer.

34. Respondent's statement that she had served the verified statement on Sandifer was false because Respondent never served the verified statement on Sandifer in case number 2022FA208.

35. Respondent knew that her statement in paragraph nine of her verified statement was false at the time she submitted the verified statement to the ARDC.

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

- a. making a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer, by conduct including making false statements in paragraphs eight and nine of the verified statement that she submitted to the ARDC pursuant to Illinois Supreme Court Rule 707 in relation to her representation of D.W. in St. Clair County case number 2022FA208, in violation of Rule 3.3(a)(1) of the Illinois Rules of Professional Conduct (2010);
- b. knowingly making a false statement of material fact in connection with a bar admission application or a disciplinary matter, by conduct including, making false statements in paragraphs eight and nine of the verified statement that she submitted to the ARDC pursuant to Illinois Supreme Court Rule 707 in relation to her representation of D.W. in St. Clair County case number 2022FA208, in violation of Rule 8.1(a) of the Illinois Rules of Professional Conduct (2010); and
- c. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including submitting a verified statement to the ARDC Administrator in which Respondent falsely stated that Sandifer was the active status Illinois attorney with whom she was associated in St. Clair

County case number 2022FA208, and falsely certified that she served the verified statement on Sandifer; in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

COUNT V

(Dishonesty and Making a False Verified Statement to the ARDC – M.B.)

37. On or about July 21, 2022, Respondent submitted a verified statement of out-of-state attorney to the Administrator of the ARDC pursuant to Supreme Court Rule 707. In her verified statement, Respondent stated that she represented M.B. in St. Clair County case number [2022CM105001], and that she had been assigned ARDC registration number 6340404.

38. In paragraph eight of her verified statement, Respondent listed Sandifer as the active status Illinois attorney with whom she was associated in case number [2022CM105001].

39. Respondent's statement that Sandifer was the active status Illinois attorney with whom she was associated in case number [2022CM105001] was false because Sandifer had not agreed to appear as the active status Illinois attorney nor had Sandifer filed an appearance in case number [2022CM105001] as required by Rule 707.

40. Respondent knew that the statement in paragraph eight of her verified statement was false at the time she submitted the verified statement to the ARDC.

41. In paragraph nine of her verified statement, Respondent certified that she had served the verified statement on Sandifer.

42. Respondent's statement that she had served the verified statement on Sandifer was false because Respondent never served the verified statement on Sandifer in case number [2022CM105001].

43. Respondent knew that her statement in paragraph nine of her verified statement was false at the time she submitted the verified statement to the ARDC.

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

- a. making a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer, by conduct including making false statements in paragraphs eight and nine of the verified statement that she submitted to the ARDC pursuant to Illinois Supreme Court Rule 707 in relation to her representation of M.B. in St. Clair County case number [2022CM105001], in violation of Rule 3.3(a)(1) of the Illinois Rules of Professional Conduct (2010);
- b. knowingly making a false statement of material fact in connection with a bar admission application or a disciplinary matter, by conduct including, making false statements in paragraphs eight and nine of the verified statement that she submitted to the ARDC pursuant to Illinois Supreme Court Rule 707 in relation to her representation of M.B. in St. Clair County case number [2022CM105001], in violation of Rule 8.1(a) of the Illinois Rules of Professional Conduct (2010); and
- c. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including submitting a verified statement to the ARDC Administrator in which Respondent falsely stated that Sandifer was the active status Illinois attorney with whom she was associated in St. Clair County case number [2022CM105001], and falsely certified that she served the verified statement on Sandifer; in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

COUNT VI

(Dishonesty and Making a False Verified Statement to the ARDC – A.M.)

45. On or about September 9, 2022, Respondent submitted a verified statement of out-of-state attorney to the Administrator of the ARDC pursuant to Supreme Court Rule 707. In her verified statement, Respondent stated that she represented A.M. in St. Clair County case number 2020F89, and that she had been assigned ARDC registration number 6340404.

46. In paragraph eight of her verified statement, Respondent listed Sandifer as the active status Illinois attorney with whom she was associated in case number 2020F89.

47. Respondent's statement that Sandifer was the active status Illinois attorney with whom she was associated in case number 2020F89 was false because Sandifer had not agreed to appear as the active status Illinois attorney nor had Sandifer filed an appearance in case number 2020F89 as required by Rule 707.

48. Respondent knew that the statement in paragraph eight of her verified statement was false at the time she submitted the verified statement to the ARDC.

49. In paragraph nine of her verified statement, Respondent certified that she had served the verified statement on Sandifer.

50. Respondent's statement that she had served the verified statement on Sandifer was false because Respondent never served the verified statement on Sandifer in case number 2020F89.

51. Respondent knew that her statement in paragraph nine of her verified statement was false at the time she submitted the verified statement to the ARDC.

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

- a. making a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer, by conduct including making false statements in paragraphs eight and nine of the verified statement that she submitted to the ARDC pursuant to Illinois Supreme Court Rule 707 in relation to her representation of A.M. in St. Clair County case number 2020F89, in violation of Rule 3.3(a)(1) of the Illinois Rules of Professional Conduct (2010);
- b. knowingly making a false statement of material fact in connection with a bar admission application or a disciplinary matter, by conduct including, making false statements in paragraphs eight and nine of the verified statement that she

submitted to the ARDC pursuant to Illinois Supreme Court Rule 707 in relation to her representation of A.M. in St. Clair County case number 2020F89, in violation of Rule 8.1(a) of the Illinois Rules of Professional conduct (2010); and

- c. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including submitting a verified statement to the ARDC Administrator in which Respondent falsely stated that Sandifer was the active status Illinois attorney with whom she was associated in St. Clair County case number 2020F89, and falsely certified that she served the verified statement on Sandifer; in violation of Rule 8.4I of the Illinois Rules of Professional Conduct (2010).

COUNT VII

(Dishonesty and Making a False Verified Statement to the ARDC – D.D.)

53. Between November 4, 2022 and May 17, 2023, attorney Victor Smith (“Smith”) was counsel of record for D.D. in St. Clair County case number 2022CF1699.

54. On or about May 17, 2023, Respondent submitted an amended verified statement of out-of-state attorney to the Administrator of the ARDC pursuant to Supreme Court Rule 707. In her amended verified statement, Respondent stated that she represented D.D. in St. Clair County case number 2022CF1699, and that she had been assigned ARDC registration number 6340404.

55. On October 23, 2023, Respondent entered her appearance as counsel for D.D. in case number 2022CF1699 and filed her amended verified statement with the court.

56. In paragraph eight of her amended verified statement, Respondent listed Smith as the active status Illinois attorney with whom she was associated in case number 2022CF1699.

57. Respondent’s statement that Smith was the active status Illinois attorney with whom she was associated in case number 2022CF1699 was false because Smith had withdrawn as counsel for D.D. on May 17, 2023.

58. Respondent knew that the statement in paragraph eight of her amended verified statement was false at the time she submitted the amended verified statement to the ARDC, and at the time she filed the amended verified statement with the court.

59. In paragraph nine of her amended verified statement, Respondent certified that she had served the verified statement on Smith.

60. Respondent's statement that she had served the verified statement on Smith was false because Respondent never served the verified statement on Smith in case number 2022CF1699.

61. Respondent knew that the statement in paragraph nine of her amended verified statement was false at the time she submitted the amended verified statement to the ARDC, and at the time she filed the amended verified statement with the court.

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

- a. making a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer, by conduct including making false statements in paragraphs eight and nine of the verified statement that she submitted to the ARDC pursuant to Illinois Supreme Court Rule 707 in relation to her representation of D.D. in St. Clair County case number 2022CF1699, in violation of Rule 3.3(a)(1) of the Illinois Rules of Professional Conduct (2010);
- b. knowingly making a false statement of material fact in connection with a bar admission application or a disciplinary matter, by conduct including, making false statements in paragraphs eight and nine of the verified statement that she submitted to the ARDC pursuant to Illinois Supreme Court Rule 707 in relation to her representation of D.D. in St. Clair County case number 2022CF1699, in violation of Rule 8.1(a) of the Illinois Rules of Professional Conduct (2010); and

c. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including submitting a verified statement to the ARDC Administrator in which Respondent falsely stated that Smith was the active status Illinois attorney with whom she was associated in St. Clair County case number 2022CF1699, and falsely certified that she served the verified statement on Smith; in violation of Rule 8.4I of the Illinois Rules of Professional Conduct (2010).

COUNT VIII

(Engaging in the Unauthorized Practice of Law, Dishonesty, and Making a False Verified Statement to the ARDC – B.D.)

63. On November 10, 2022, Smith entered his appearance on behalf of B.D. in Madison County case number 2022CF2699.

64. On February 1, 2023, Respondent appeared in case number 2022CF2699 on behalf of B.D. for a hearing on the motion to reduce bond that Smith had previously filed with the court. At the hearing, Respondent told Judge Neil T. Schroeder that she was appearing for Smith on behalf of B.D. After reviewing the court file for case number 2022CF2699, Judge Shroeder determined that Respondent was not in compliance with Rule 707 and admonished her about the requirements of the Rule.

65. At the time Respondent appeared in court on February 1, 2023, she knew that she had neither submitted a verified statement of out-of-state attorney to the Administrator pursuant to Rule 707 nor was permitted to provide legal services to B.D. in case number 2022CF2699.

66. On June 9, 2023, Respondent filed a substitution of counsel in case number 2022CF2699, substituting as counsel for B.D. in place of Smith. On the same date, Respondent filed a verified statement of out-of-state attorney with the court pursuant to Rule 707. In her verified statement, Respondent stated that she represented B.D. in case number 2022CF2699, and that she had been assigned ARDC registration number 6340404.

67. In paragraph eight of her verified statement, Respondent listed Smith as the active status Illinois attorney with whom she was associated in case number 2022CF2699.

68. Respondent's statement that Smith was the active status Illinois attorney with whom she was associated in case number 2022CF2699 was false because on June 9, 2023, Respondent substituted in as counsel for B.D. in place of Smith in case number 2022CF2699.

69. Respondent knew that the statement in paragraph eight of her verified statement was false when she submitted the verified statement to the ARDC and when she filed the verified statement with the court.

70. In paragraph nine of the verified statement, Respondent certified that she had served the verified statement on Smith.

71. Respondent's statement that she had served the verified statement on Smith was false because Respondent never served the verified statement on Smith in case number 2022CF2699.

72. Respondent knew that the statement in paragraph nine of her verified statement was false at the time she submitted the verified statement to the ARDC, and at the time she filed the verified statement with the court.

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

- a. making a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer, by conduct including making false statements in paragraphs eight and nine of the verified statement that she submitted to the ARDC pursuant to Illinois Supreme Court Rule 707 in relation to her representation of B.D. in Madison County case number 2022CF2699, in violation of Rule 3.3(a)(1) of the Illinois Rules of Professional Conduct (2010);

- b. practicing law in a jurisdiction in violation of the regulation of the legal profession in that jurisdiction, by conduct including appearing in court in Madison County case number 2022CF2699 on behalf of B.D. on February 1, 2023, and engaging in the practice of law when Respondent knew that she had not submitted a verified statement of out-of-state attorney to the Administrator of the ARDC pursuant to Rule 707, and was not permitted to provide legal services to B.D. in case number 2022CF2699, in violation of Rule 5.5 (a) of the Illinois Rules of Professional Conduct (2010);
- c. holding out to the public or otherwise representing that the lawyer is admitted to practice law in this jurisdiction, by conduct including, appearing in court in Madison County case number 2022CF2699 on behalf of B.D. on February 1, 2023, and holding herself out to the court and the State's attorney that she was admitted to practice law in Illinois, in violation of Rule 5.5(b)(2) of the Illinois Rules of Professional Conduct (2010);
- d. knowingly making a false statement of material fact in connection with a bar admission application or a disciplinary matter, by conduct including, making false statements in paragraphs eight and nine of the verified statement that she submitted to the ARDC pursuant to Illinois Supreme Court Rule 707 in relation to her representation of B.D. in Madison County case number 2022CF2699, in violation of Rule 8.1(a) of the Illinois Rules of Professional Conduct (2010); and
- e. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including submitting a verified statement to the ARDC Administrator in which Respondent falsely stated that Smith was the active status Illinois attorney with whom she was associated in St. Clair County case number 2022CF2699, and falsely certified that she served the verified statement on Smith; in violation of Rule 8.4I of the Illinois Rules of Professional Conduct (2010).

COUNT IX

(Dishonesty and Making a False Verified Statement to the ARDC – B.D.)

74. On May 25, 2023, Respondent entered her appearance as counsel for B.D. in St.

Clair County case number 2023CF59401.

75. On or about June 14, 2023, Respondent submitted a verified statement of out-of-state attorney to the Administrator of the ARDC pursuant to Supreme Court Rule 707. In her verified statement, Respondent stated that she represented B.D. in St. Clair County case number 2023CF59401, and that she had been assigned ARDC registration number 6340404.

76. In paragraph eight of her verified statement, Respondent listed Smith as the active status Illinois attorney with whom she was associated in case number 2023CF59401.

77. Respondent's statement that Smith was the active status Illinois attorney with whom she was associated in case number 2023CF59401 was false because Smith had not agreed to appear as the active status Illinois attorney nor had Smith filed an appearance in case number 2023CF59401 as required by Rule 707.

78. Respondent knew that the statement in paragraph eight of her verified statement was false when she submitted the verified statement to the ARDC.

79. In paragraph nine of the verified statement, Respondent certified that she had served the verified statement on Smith.

80. Respondent's statement that she had served the verified statement on Smith was false because Respondent never served the verified statement on Smith in case number 2023CF59401.

81. Respondent knew that the statement in paragraph nine of her verified statement was false at the time she submitted the verified statement to the ARDC.

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

- a. making a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer, by conduct including making false statements in paragraphs eight and nine of the

verified statement that she submitted to the ARDC pursuant to Illinois Supreme Court Rule 707 in relation to her representation of B.D. in St. Clair County case number 2023CF59401, in violation of Rule 3.3(a)(1) of the Illinois Rules of Professional Conduct (2010);

b. knowingly making a false statement of material fact in connection with a bar admission application or a disciplinary matter, by conduct including, making false statements in paragraphs eight and nine of the verified statement that she submitted to the ARDC pursuant to Illinois Supreme Court Rule 707 in relation to her representation of B.D. in St. Clair County case number 2023CF59401, in violation of Rule 8.1(a) of the Illinois Rules of Professional Conduct (2010); and

c. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including submitting a verified statement to the ARDC Administrator in which Respondent falsely stated that Smith was the active status Illinois attorney with whom she was associated in St. Clair County case number 2023CF59401, and falsely certified that she served the verified statement on Smith; in violation of Rule 8.4I of the Illinois Rules of Professional Conduct (2010).

COUNT X

(Dishonesty and Making a False Verified Statement to the ARDC – C.M.)

83. On or about March 7, 2023, Respondent submitted a verified statement of out-of-state attorney to the Administrator of the ARDC pursuant to Supreme Court Rule 707. In her verified statement, Respondent stated that she represented C.M. in St. Clair County case number 2023CF41601, and that she had been assigned ARDC registration number 6340404.

84. In paragraph eight of her verified statement, Respondent listed Smith as the active status Illinois attorney with whom she was associated in case number 2023CF41601.

85. Respondent's statement that Smith was the active status Illinois attorney with whom she was associated in case number 2023CF41601 was false because Smith had not agreed

to appear as the active status Illinois attorney nor had Smith filed an appearance in case number 2023CF41601 as required by Rule 707.

86. Respondent knew that the statement in paragraph eight of her verified statement was false when she submitted the verified statement to the ARDC.

87. In paragraph nine of the verified statement, Respondent certified that she had served the verified statement on Smith.

88. Respondent's statement that she had served the verified statement on Smith was false because Respondent never served the verified statement on Smith in case number 2023CF41601.

89. Respondent knew that the statement in paragraph nine of her verified statement was false at the time she submitted the verified statement to the ARDC.

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

- a. making a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer, by conduct including making false statements in paragraphs eight and nine of the verified statement that she submitted to the ARDC pursuant to Illinois Supreme Court Rule 707 in relation to her representation of C.M. in St. Clair County case number 2023CF41601, in violation of Rule 3.3(a)(1) of the Illinois Rules of Professional Conduct (2010);
- b. knowingly making a false statement of material fact in connection with a bar admission application or a disciplinary matter, by conduct including, making false statements in paragraphs eight and nine of the verified statement that she submitted to the ARDC pursuant to Illinois Supreme Court Rule 707 in relation to her representation of C.M. in St. Clair County case number 2023CF41601, in violation of Rule 8.1(a) of the Illinois Rules of Professional Conduct (2010); and

c. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including submitting a verified statement to the ARDC Administrator in which Respondent falsely stated that Smith was the active status Illinois attorney with whom she was associated in St. Clair County case number 2023CF41601, and falsely certified that she served the verified statement on Smith; in violation of Rule 8.4I of the Illinois Rules of Professional Conduct (2010).

COUNT XI

(Dishonesty and Making a False Verified Statement to the ARDC – C.L.)

91. On or about June 7, 2023, Respondent submitted a verified statement of out-of-state attorney to the Administrator of the ARDC pursuant to Supreme Court Rule 707. In her verified statement, Respondent stated that she represented C.L. in St. Clair County case number 2022CF138901, and that she had been assigned ARDC registration number 6340404.

92. In paragraph eight of her verified statement, Respondent listed Smith as the active status Illinois attorney with whom she was associated in case number 2022CF138901.

93. Respondent's statement that Smith was the active status Illinois attorney with whom she was associated in case number 2022CF138901 was false because Smith had not agreed to appear as the active status Illinois attorney nor had Smith filed an appearance in case number 2022CF138901 as required by Rule 707.

94. Respondent knew that the statement in paragraph eight of her verified statement was false when she submitted the verified statement to the ARDC.

95. In paragraph nine of her verified statement, Respondent certified that she had served the verified statement on Smith.

96. Respondent's statement that she had served the verified statement on Smith was false because Respondent never served the verified statement on Smith in case number 2022CF138901.

97. Respondent knew that the statement in paragraph nine of her verified statement was false at the time she submitted the verified statement to the ARDC.

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

- a. making a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer, by conduct including making false statements in paragraphs eight and nine of the verified statement that she submitted to the ARDC pursuant to Illinois Supreme Court Rule 707 in relation to her representation of C.L. in St. Clair County case number 2022CF138901, in violation of Rule 3.3(a)(1) of the Illinois Rules of Professional Conduct (2010);
- b. knowingly making a false statement of material fact in connection with a bar admission application or a disciplinary matter, by conduct including, making false statements in paragraphs eight and nine of the verified statement that she submitted to the ARDC pursuant to Illinois Supreme Court Rule 707 in relation to her representation of C.L. in St. Clair County case number 2022CF138901, in violation of Rule 8.1(a) of the Illinois Rules of Professional Conduct (2010); and
- c. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including submitting a verified statement to the ARDC Administrator in which Respondent falsely stated that Smith was the active status Illinois attorney with whom she was associated in St. Clair County case number 2022CF138901, and falsely certified that she served the verified statement on Smith; in violation of Rule 8.4I of the Illinois Rules of Professional Conduct (2010).

COUNT XII

(Dishonesty and Making a False Verified Statement to the ARDC – J.S.)

99. On or about May 5, 2023, Respondent submitted a verified statement of out-of-state attorney to the Administrator of the ARDC pursuant to Supreme Court Rule 707. In her verified statement, Respondent stated that she represented J.S. in St. Clair County case numbers

2023CF74001 and 2023CF74002, and that she had been assigned ARDC registration number 6340404.

100. In paragraph eight of her verified statement, Respondent listed Smith as the active status Illinois attorney with whom she was associated in case numbers 2023CF74001 and 2023CF74002.

101. Respondent's statement that Smith was the active status Illinois attorney with whom she was associated in case numbers 2023CF74001 and 2023CF74002 was false because Smith had not agreed to appear as the active status Illinois attorney nor had Smith filed an appearance in case numbers 2023CF74001 and 2023CF74002 as required by Rule 707.

102. Respondent knew that the statement in paragraph eight of her verified statement was false when she submitted the verified statement to the ARDC.

103. In paragraph nine of her verified statement, Respondent certified that she had served the verified statement on Smith.

104. Respondent's statement that she had served the verified statement on Smith was false because Respondent never served the verified statement on Smith in case numbers 2023CF74001 and 2023CF74002.

105. Respondent knew that the statement in paragraph nine of her verified statement was false at the time she submitted the verified statement to the ARDC.

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

- a. making a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer, by conduct including making false statements in paragraphs eight and nine of the verified statement that she submitted to the ARDC pursuant to Illinois Supreme Court Rule 707 in relation to her

representation of J.S. in St. Clair County case numbers 2023CF74001 and 2023CF74002, in violation of Rule 3.3(a)(1) of the Illinois Rules of Professional Conduct (2010);

- b. knowingly making a false statement of material fact in connection with a bar admission application or a disciplinary matter, by conduct including, making false statements in paragraphs eight and nine of the verified statement that she submitted to the ARDC pursuant to Illinois Supreme Court Rule 707 in relation to her representation of J.S. in St. Clair County case numbers 2023CF74001 and 2023CF74002, in violation of Rule 8.1(a) of the Illinois Rules of Professional Conduct (2010); and
- c. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including submitting a verified statement to the ARDC Administrator in which Respondent falsely stated that Smith was the active status Illinois attorney with whom she was associated in St. Clair County case numbers 2023CF74001 and 2023CF74002, and falsely certified that she served the verified statement on Smith; in violation of Rule 8.4I of the Illinois Rules of Professional Conduct (2010).

COUNT XIII
(Engaging in the Unauthorized Practice of Law – C.I.)

107. On September 13, 2022, Respondent entered her appearance on behalf of C.I. in St. Clair County case number 2022FA0003, and used ARDC registration number 6340404 in all pleadings that she caused to be filed in the proceeding.

108. At no time did Respondent submit a verified statement of out-of-state attorney to the Administrator of the ARDC seeking permission to provide legal services to C.I. in case number 2022FA0003, as required by Rule 707.

109. Respondent provided legal services to C.I. in case number 2022FA0003 without an active status Illinois attorney associating with her and actively participating in the proceeding.

110. 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 entering her appearance in St. Clair County case number 2022FA0003 on behalf of C.I. and engaging in the practice of law when Respondent had not submitted a verified statement of out-of-state attorney to the Administrator of the ARDC pursuant to Rule 707 seeking permission to provide legal services to C.I. in case number 2022FA0003, in violation of Rule 5.5 (a) of the Illinois Rules of Professional Conduct (2010); and
- b. holding out to the public or otherwise representing that the lawyer is admitted to practice law in this jurisdiction, by conduct including, entering her appearance on behalf of C.I. in St. Clair County case number 2022FA0003, and holding herself out to the court that she was admitted to practice law in Illinois, in violation of Rule 5.5(b)(2) of the Illinois Rules of Professional Conduct (2010).

COUNT XIV
(Engaging in the Unauthorized Practice of Law– T.G.)

111. On December 7, 2022, Respondent entered her appearance on behalf of T.G. in St. Clair County case number 2022DT41601, and used ARDC registration number 6340404 in all pleadings that she caused to be filed in the proceeding.

112. At no time did Respondent submit a verified statement of out-of-state attorney to the Administrator of the ARDC seeking permission to provide legal services to T.G. in case number 2022DT41601, as required by Rule 707.

113. Between December 7, 2022 and September 27, 2023, Respondent provided legal services to T.G. in case number 2022DT41601 without an active status Illinois attorney associating with her and actively participating in the proceeding.

114. 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 entering her appearance in St. Clair County case number 2022DT41601 on behalf of T.G. and engaging in the practice of law when Respondent had not submitted a verified statement of out-of-state attorney to the Administrator of the ARDC pursuant to Rule 707 seeking permission to provide legal services to T.G. in case number 2022DT41601, in violation of Rule 5.5(a) of the Illinois Rules of Professional Conduct (2010); and
- b. holding out to the public or otherwise representing that the lawyer is admitted to practice law in this jurisdiction, by conduct including, entering her appearance on behalf of T.G. in St. Clair County case number 2022DT41601, and holding herself out to the court that she was admitted to practice law in Illinois, in violation of Rule 5.5(b)(2) of the Illinois Rules of Professional Conduct (2010).

COUNT XV
(Engaging in the Unauthorized Practice of Law – D.C.)

115. On April 4, 2023, Respondent entered her appearance on behalf of D.C. in St. Clair County case number 2022CF158201, and used ARDC registration number 6340404 in all pleadings that she caused to be filed in the proceeding.

116. At no time did Respondent submit a verified statement of out-of-state attorney to the Administrator of the ARDC seeking permission to provide legal services to D.C. in case number 2022CF158201, as required by Rule 707.

117. Between April 4, 2023 and August 1, 2023, Respondent provided legal services to D.C. in case number 2022CF158201 without an active status Illinois attorney associating with her and actively participating in the proceeding.

118. 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 entering her appearance in St. Clair County case number 2022CF158201 on behalf of D.C. and engaging in the practice of law when Respondent had not submitted a verified statement of out-of-state attorney to the Administrator of the ARDC pursuant to Rule 707 seeking permission to provide legal services to D.C. in case number 2022CF158201, in violation of Rule 5.5(a) of the Illinois Rules of Professional Conduct (2010); and
- b. holding out to the public or otherwise representing that the lawyer is admitted to practice law in this jurisdiction, by conduct including, entering her appearance on behalf of D.C. in St. Clair County case number 2022CF158201, and holding herself out to the court that she was admitted to practice law in Illinois, in violation of Rule 5.5(b)(2) of the Illinois Rules of Professional Conduct (2010).

COUNT XVI
(Engaging in the Unauthorized Practice of Law - D.R.)

119. On April 4, 2023, Respondent entered her appearance on behalf of D.R. in St. Clair County case number 2022CF33801, and used ARDC registration number 6340404 in all pleadings that she caused to be filed in the proceeding.

120. At no time did Respondent submit a verified statement of out-of-state attorney to the Administrator of the ARDC seeking permission to provide legal services to D.R. in case number 2022CF33801, as required by Rule 707.

121. Between April 4, 2023 and August 1, 2023, Respondent provided legal services to D.R. in case number 2022CF33801 without an active status Illinois attorney associating with her and actively participating in the proceeding.

122. 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 entering her appearance in St. Clair County case number 2022CF33801 on behalf of D.R. and engaging in the practice of law when Respondent had not submitted a verified statement of out-of-state attorney to the Administrator of the ARDC pursuant to Rule 707 seeking permission to provide legal services to D.R. in case number 2022CF33801, in violation of Rule 5.5(a) of the Illinois Rules of Professional Conduct (2010); and
- b. holding out to the public or otherwise representing that the lawyer is admitted to practice law in this jurisdiction, by conduct including, entering her appearance on behalf of D.R. in St. Clair County case number 2022CF33801, and holding herself out to the court that she was admitted to practice law in Illinois, in violation of Rule 5.5(b)(2) of the Illinois Rules of Professional Conduct (2010).

COUNT XVII
(Engaging in the Unauthorized Practice of Law T.T.)

123. On April 24, 2023, Respondent entered her appearance on behalf of T.T. in St. Clair County case number 2023CF407, and used ARDC registration number 6340404 in all pleadings that she caused to be filed in the proceeding.

124. At no time did Respondent submit a verified statement of out-of-state attorney to the Administrator of the ARDC seeking permission to provide legal services to T.T. in case number 2023CF407, as required by Rule 707.

125. Between April 24, 2023 and August 1, 2023, Respondent provided legal services to T.T. in case number 2023CF407 without an active status Illinois attorney associating with her and actively participating in the proceeding.

126. 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 entering her appearance in St. Clair County case number 2023CF407 on behalf of T.T. and engaging in the practice of law when Respondent had not submitted a verified statement of out-of-state attorney to the Administrator of the ARDC pursuant to Rule 707 seeking permission to provide legal services to T.T. in case number 2023CF407, in violation of Rule 5.5(a) of the Illinois Rules of Professional Conduct (2010); and
- b. holding out to the public or otherwise representing that the lawyer is admitted to practice law in this jurisdiction, by conduct including, entering her appearance on behalf of T.T. in St. Clair County case number 2023CF407, and holding herself out to the court that she was admitted to practice law in Illinois, in violation of Rule 5.5(b)(2) of the Illinois Rules of Professional Conduct (2010).

COUNT XVIII
(Engaging in the Unauthorized Practice of Law—J.H.)

127. On May 2, 2023, Respondent entered her appearance on behalf of J.H. in St. Clair County case number 2020CF33, and used ARDC registration number 6340404 in all pleadings that she caused to be filed in the proceeding.

128. At no time did Respondent submit a verified statement of out-of-state attorney to the Administrator of the ARDC seeking permission to provide legal services to J.H. in case number 2020CF33, as required by Rule 707.

129. Between May 2, 2023 and August 1, 2023, Respondent provided legal services to J.H. in case number 2020CF33 without an active status Illinois attorney associating with her and actively participating in the proceeding.

130. 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 entering her appearance in St. Clair County case number 2020CF33 on behalf of J.H. and engaging in the practice of law when Respondent had not submitted a verified statement of out-of-state attorney to the Administrator of the ARDC pursuant to Rule 707 seeking permission to legal services to J.H. in case number 2020CF33, in violation of Rule 5.5(a) of the Illinois Rules of Professional Conduct (2010); and
- b. holding out to the public or otherwise representing that the lawyer is admitted to practice law in this jurisdiction, by conduct including, entering her appearance on behalf of J.H. in St. Clair County case number 2020CF33, and holding herself out to the court that she was admitted to practice law in Illinois, in violation of Rule 5.5(b)(2) of the Illinois Rules of Professional Conduct (2010).

COUNT XIX
(Engaging in the Unauthorized Practice of Law – J.J.)

131. On May 26, 2023, Respondent entered her appearance on behalf of J.J. in St. Clair County case number 2023CF73101, and used ARDC registration number 6340404 in all pleadings she caused to be filed in the proceeding.

132. At no time did Respondent submit a verified statement of out-of-state attorney to the Administrator of the ARDC seeking permission to provide legal services to J.J. in case number 2023CF73101, as required by Rule 707.

133. Between May 26, 2023 and August 1, 2023, Respondent provided legal services to J.J. in case number 2023CF73101 without an active status Illinois attorney associating with her and actively participating in the proceeding.

134. 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 entering her appearance in St. Clair County case number 2023CF73101 on behalf of J.J. and engaging in the practice of law when Respondent had not submitted a verified statement of out-of-state attorney to the Administrator of the ARDC pursuant to Rule 707 seeking permission to provide legal services to J.J. in case number 2023CF73101, in violation of Rule 5.5(a) of the Illinois Rules of Professional Conduct (2010); and
- b. holding out to the public or otherwise representing that the lawyer is admitted to practice law in this jurisdiction, by conduct including, entering her appearance on behalf of J.J. in St. Clair County case number 2023CF73101, and holding herself out to the court that she was admitted to practice law in Illinois, in violation of Rule 5.5(b)(2) of the Illinois Rules of Professional Conduct (2010).

COUNT XX
(Engaging in the Unauthorized Practice of Law – E.N.)

135. On July 28, 2023, Respondent entered her appearance on behalf of E.N. in St. Clair County case number 2023CF117001, and used ARDC registration number 6340404 in all pleadings she caused to be filed in the proceeding.

136. At no time did Respondent submit a verified statement of out-of-state attorney to the Administrator of the ARDC seeking permission to provide legal services to E.N. in case number 2023CF117001, as required by Rule 707.

137. Between July 28, 2023 and August 11, 2023, Respondent provided legal services to E.N. in case number 2023CF117001 without an active status Illinois attorney associating with her and actively participating in the proceeding.

138. 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 entering her appearance in St. Clair County case number 2023CF117001 on behalf of E.N. and engaging in the practice of law when Respondent had not submitted a verified statement of out-of-state attorney to the Administrator of the ARDC pursuant to Rule 707 seeking permission to provide legal services to E.N. in case number 2023CF117001, in violation of Rule 5.5(a) of the Illinois Rules of Professional Conduct (2010); and
- b. holding out to the public or otherwise representing that the lawyer is admitted to practice law in this jurisdiction, by conduct including, entering her appearance on behalf of E.N. in St. Clair County case number 2023CF117001, and holding herself out to the court that she was admitted to practice law in Illinois, in violation of Rule 5.5(b)(2) 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, conclusions of fact and law, and a recommendation for such discipline as is warranted.

Respectfully submitted,

Lea S. Gutierrez, Administrator
Attorney Registration and
Disciplinary Commission

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