# 2024PR00069

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

In the Matter of:	)		
LAUREN B. MCQUEEN,	)	Commission No.	2024PR00069
Attorney-Respondent,	)	Commission 1vo.	202 11 1100000
No. 6331440.	)		

# **COMPLAINT**

Lea S. Gutierrez, Administrator of the Attorney Registration and Disciplinary Commission, by her attorney, Tammy L. Evans, pursuant to Supreme Court Rule 753(b), complains of Respondent, Lauren B. McQueen, who was licensed to practice law in Illinois on May 9, 2019, and alleges that Respondent has engaged in the following conduct which subjects her to discipline pursuant to Supreme Court Rule 770:

#### COUNT I

(Dishonesty – Unauthorized Use of Funds from the Champaign County Bar Association's Busey Bank Account)

- 1. Between May 2019 and May 2021, Respondent was employed as an assistant state's attorney for Champaign County. Between June 2021 and August 2022, Respondent was employed as an associate attorney with Erwin, Martinkus & Cole, a law firm in Champaign.
- 2. On February 20, 2020, Respondent was elected to the board of the Champaign County Bar Association ("CCBA").
- 3. On March 5, 2020, Respondent was elected treasurer of the CCBA and served as treasurer until March 2023, when she was elected president of the CCBA.

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- 4. Between February 2020 and December 2022, the CCBA had a self-titled checking account held at Busey Bank ("Busey account"). In August 2022, the CCBA opened a self-titled checking account at Iroquois Federal Bank ("IFB account"). On December 21, 2022, the CCBA closed the Busey account.
- 5. Respondent's duties as treasurer included depositing funds into the Busey and IFB accounts, writing checks and using the debit cards that were issued for the Busey and IFB accounts for CCBA expenses, and reconciling the Busey and IFB accounts monthly. Respondent maintained possession of the debit cards for the Busey and IFB accounts until she resigned as president of the CCBA and as a member of the CCBA board on January 30, 2024.

6. Between February 2021 and September 2022, Respondent made the following seventeen (17) cash withdrawals from the Busey account totaling \$4,176:

DATE	TRANSACTION TYPE	AMOUNT
February 25, 2021	Teller cash withdrawal	\$126
March 11, 2021	Teller cash withdrawal	\$40
March 25, 2021	Teller cash withdrawal	\$20
July 28, 2021	ATM withdrawal	\$300
July 28, 2021	ATM withdrawal	\$200
July 29, 2021	ATM withdrawal	\$240
September 24, 2021	Teller cash withdrawal	\$300
January 26, 2022	Teller cash withdrawal	\$300
January 27, 2022	Teller cash withdrawal	\$300
April 8, 2022	Teller cash withdrawal	\$400
April 26, 2022	Teller cash withdrawal	\$200

May 13, 2022	Teller cash withdrawal	\$300
May 27, 2022	Teller cash withdrawal	\$300
July 12, 2022	Teller cash withdrawal	\$300
July 27, 2022	Teller cash withdrawal	\$500
September 9, 2022	Teller cash withdrawal	\$250
September 28, 2022	Teller cash withdrawal	\$100
		Total: \$4,176

- 7. Respondent used the funds described in paragraph six, above, for her own personal or business purposes without authorization.
- 8. At no time did the CCBA board or anyone else authorize Respondent to use the funds described in paragraph six, above, for her own personal or business purposes.
- 9. By reason of the conduct described above, Respondent has engaged in the following misconduct:
  - a. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation by conduct including knowingly using \$4,176 in funds belonging to the CCBA for her own personal or business purposes without authority, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

### COUNT II

(Dishonesty – Unauthorized Use of Funds from the Champaign County Bar Association's Iroquois Federal Bank Account)

- 10. The Administrator realleges and incorporates paragraphs 1 through 8, above.
- 11. Between August 2022 and February 2024, Respondent was employed as an associate attorney with Meyer Capel, a law firm in Champaign. Meyer Capel terminated

Respondent in February 2024. Respondent is currently employed as an assistant state's attorney for Edgar County.

12. Between September 12, 2022, and July 31, 2023, Respondent made the following cash withdrawals and purchases from the IFB account totaling \$5,136.71:

DATE	TRANSACTION TYPE	AMOUNT
September 12, 2022	Teller cash withdrawal	\$1,000
October 27, 2022	ATM withdrawal	\$203
October 27, 2022	ATM fee	\$1
October 27, 2022	ATM withdrawal	\$203
October 27, 2022	ATM fee	\$1
October 27, 2022	ATM withdrawal	\$103
October 27, 2022	ATM fee	\$1
October 31, 2022	ATM withdrawal	\$203
October 31, 2022	ATM fee	\$1
October 31, 2022	ATM withdrawal	\$203
October 31, 2022	ATM fee	\$1
October 31, 2022	ATM withdrawal	\$103
October 31, 2022	ATM fee	\$1
October 31, 2022	Debit card purchase at Las Maria's Restaurant	\$68.71
November 25, 2022	Debit card purchase at Target	\$126.51
November 25, 2022	Debit card purchase at Hobby Lobby	\$47.09
November 28, 2022	ATM withdrawal	\$302.50
November 28, 2022	Debit card purchase at ATH	\$67.16

November 28, 2022	ATM withdrawal	\$63.50
November 28, 2022	ATM withdrawal	\$202.50
November 28, 2022	Debit card purchase at Thorntons	\$13.30
November 28, 2022	Debit card purchase at Speedway	\$4.20
November 28, 2022	Debit card purchase at Circle K	\$13.48
November 28, 2022	ATM fee	\$1
November 28, 2022	ATM fee	\$1
November 28, 2022	ATM fee	\$1
November 28, 2022	Debit card purchase at Menards	\$48.82
November 28, 2022	Debit card purchase at Homegoods	\$25.05
November 29, 2022	Debit card purchase at Haymakers	\$40.22
November 29, 2022	ATM withdrawal	\$203
November 29, 2022	ATM fee	\$1
November 30, 2022	Debit card purchase at La Bamba	\$21.22
January 11, 2023	Cash withdrawal from deposit	\$60
January 13, 2023	ATM withdrawal at Buford's Pub, 109 E. Market Street, Sadorus, IL	\$203
January 13, 2023	ATM fee	\$1
January 27, 2023	ATM withdrawal at Pia's Sports Bar, 1609 W. Springfield Ave., Champaign, IL	\$203
January 27, 2023	ATM fee	\$1
January 31, 2023	Debit card purchase at Toast	\$20.07
February 9, 2023	Cash withdrawal from deposit	\$100

February 14, 2023	Debit card purchase as Hobby	\$71.31
•	Lobby	
February 14, 2023	Debit card purchase at Hobby Lobby	\$1.07
February 16, 2023	Debit card purchase at Circle K	\$20.08
March 15, 2023	ATM withdrawal at Pia's Sports Bar, 1609 W. Springfield, Champaign, IL	\$203
March 15, 2023	ATM fee	\$1
March 15, 2023	Debit card purchase at Auntie Lee's Chinese Kitchen	\$32.97
April 13, 2023	ATM withdrawal at Pia's Sports Bar, 1609 W. Springfield, Champaign, IL	\$63
April 13, 2023	ATM fee	\$1
April 13, 2023	ATM withdrawal at Pia's Sports Bar, 1609 W. Springfield Ave., Champaign, IL	\$43
April 13, 2023	ATM fee	\$1
April 14, 2023	ATM withdrawal at Busey Bank, 201 W. Main Street, Urbana, IL	\$103
April 14, 2023	ATM fee	\$1
April 17, 2023	ATM withdrawal at Game On Sports Tavern, 121 E. Market Street, Sadorus, IL	\$63
April 17, 2023	ATM fee	\$1
May 1, 2023	ATM withdrawal at Tumble Inn Tavern, 302 S. Neil Street, Champaign, IL	\$203
May 1, 2023	ATM fee	\$1
May 8, 2023	ATM withdrawal at Buford's Pub, 109 E. Market Street, Sadorus, IL	\$203
May 8, 2023	ATM fee	\$1
May 8, 2023	ATM withdrawal at Game On Sports Tavern, 121 E. Market	\$203

	Street, Sadorus, IL	
May 8, 2023	ATM fee	\$1
July 31, 2023	Debit card purchase at El Toro	\$55.95
	at the Fields	
		TOTAL: \$5,136.71

- 13. Respondent used the funds described in paragraph 12, above, for her own personal or business purposes without authority.
- 14. At no time did the CCBA Board or anyone else authorize Respondent to use the funds described in paragraph 12, above, for her own personal or business purposes.
- 15. By reason of the conduct described above, Respondent has engaged in the following misconduct:
  - a. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation by conduct including knowingly using \$5,136.71 in funds belonging to the CCBA for her own personal or business purposes without authority, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

## **COUNT III**

(Dishonesty - Making a False Statement to CCBA Board Members)

- 16. The Administrator realleges and incorporates paragraphs 11 through 14, above.
- 17. While preparing the 2024 CCBA budget, Colleen Ramais, the CCBA treasurer, noticed several unauthorized cash withdrawals and purchases that were made with the IFB account debit card.
- 18. On or about January 23, 2024, Ms. Ramais and Brett Kepley, the CCBA vice-president, met with Respondent to investigate the unauthorized withdrawals and purchases that were made with the IFB account debit card. During the meeting, Respondent stated to Ms.

Ramais and Mr. Kepley that C.P., her spouse, had used the debit card and made the unauthorized

cash withdrawals and purchases from the IFB account.

19. Respondent's statement to Ms. Ramais and Mr. Kepley that C.P., her spouse, had

used the debit card and made the unauthorized cash withdrawals and purchases from the IFB

account was false, because Respondent had used the debit card and made the unauthorized cash

withdrawals and purchases from the IFB account.

20. At the time Respondent made the statement to Ms. Ramais and Mr. Kepley

described in paragraph 18, above, she knew the statement was false.

21. By reason of the conduct described above, Respondent has engaged in the

following misconduct:

engaging in conduct involving dishonesty, fraud, deceit, or a.

misrepresentation by conduct including making the false statement to Ms. Ramais and Mr. Kepley described in

paragraph 18, above, in violation of Rule 8.4(c) of the

Illinois Rules of Professional Conduct (2010).

WHEREFORE, the Administrator 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** 

By: <u>/s/ Tammy L. Evans</u> Tammy L. Evans

Tammy L. Evans

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