

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

In the Matter of:

ERIC J. RYAN,

Attorney-Respondent,
No. 6275824

Commission No. 2025PR00020

NOTICE OF FILING

**To: Morgan B. Handwerker
 mhandwerker@iardc.org**

**ARDC eService Address
ARDCeService@iardc.org**

PLEASE TAKE NOTICE that on April 15, 2025, an electronic copy of the undersigned Respondent's Answer; Affidavit Regarding Lack of Sufficient Information; Rule 253 Disclosure of Witnesses; and this Notice of Filing were submitted to the Clerk of the Attorney Registration and Disciplinary Commission in Chicago, Illinois for filing via Odyssey File & Serve. On that same date, a copy was served on the above via e-mail through Odyssey File & Serve.

Respectfully Submitted,

/s/ Eric J. Ryan

Eric J. Ryan

Eric J. Ryan
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4/15/2025 10:00 AM
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PROOF OF SERVICE

The undersigned, an attorney, hereby certifies, pursuant to the Illinois Code of Civil Procedure, 735 ILCS 5/109, that he served a copy of the Respondent's Answer; Affidavit Regarding Lack of Sufficient Information; Rule 253 Disclosure of Witnesses; and the attached Notice of Filing on the ARDC via email (through Odyssey File & Serve) at mhandwerker@iadc.org and ARDCeService@iadc.org on April 15, 2025.

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.

/s/ Eric J. Ryan

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ANSWER TO COMPLAINT

Eric J. Ryan, Attorney-Respondent, pursuant to Commission Rule 231, and for his Answer to the Complaint filed on March 20, 2025, states as follows:

ALLEGATIONS COMMON TO ALL COUNTS

1. At all times alleged in this complaint, Respondent owned and operated The Law Office of Eric J. Ryan, LLC (“Respondent’s law firm”).

ANSWER: Respondent admits the allegations of this paragraph.

2. At all times alleged in this complaint, Respondent maintained a client trust account at Old Second National Bank, ending in 3529, entitled Client Trust Account Law Offices of Eric J. Ryan, LLC (“client trust account”). The client trust account was used by Respondent as a depository of funds belonging to Respondent's clients, third parties, or presently or potentially, to Respondent.

ANSWER: Respondent admits the allegations of this paragraph.

3. At all times alleged in this complaint, Respondent maintained an operating account at Old Second National Bank, ending in 3511, entitled Law Offices of Eric J. Ryan, LLC (“operating account”).

ANSWER: Respondent admits the allegations of this paragraph.

4. The operating account was used by Respondent as a depository of funds presently or

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potentially belonging to Respondent or Respondent's law firm.

ANSWER: Respondent admits the allegations of this paragraph.

5. At all times alleged in this complaint, Respondent was the sole person responsible for signing checks drawn on his client trust account.

ANSWER: Respondent admits the allegations of this paragraph.

COUNT I

6. The Administrator realleges and incorporates paragraphs 1 through 5 above as if set forth verbatim herein.

ANSWER: Respondent restates and incorporates the answers to paragraphs 1 through 5 above as if set forth herein.

7. On or about May 7, 2015, Steven Marderosian ("Marderosian"), as administrator of the Estate of Ardash Marderosian and Respondent agreed that Respondent's law firm, would represent the Estate of Ardash Marderosian in connection with the case *Estate of Ardash Marderosian v. Burgess Square Healthcare Weiser Cordero, MD & Julie Farrell, MD*, 2016 L 000769 which, at the time, was pending in the Circuit Court of DuPage County ("lawsuit").

ANSWER: Respondent admits the allegations of this paragraph except for the case number and location of the lawsuit set forth in the last two lines of this paragraph on the date of retention, but admits that the cited case number and circuit were correct after the case was later transferred from the Cook County location where Marderosian had filed it.

8. Marderosian and Respondent agreed that Respondent would be paid one-third (1/3) of any settlement proceeds received on behalf of the Estate of Ardash Marderosian in connection with the lawsuit.

ANSWER: Respondent admits the allegations of this paragraph.

9. On June 19, 2018, Marderosian, as administrator of the Estate of Ardash Marderosian, entered into a settlement agreement in connection with the lawsuit, as set forth above. The parties agreed that Burgess Square Healthcare would pay the Estate of Ardash Marderosian \$30,000.00 as and for settlement in connection with same.

ANSWER: Respondent admits the allegations of this paragraph.

10. In connection with that settlement, Burgess Square Healthcare issued check number 1397, dated July 6, 2018, payable to the order of “The Law Offices of Eric J. Ryan as Attorney for the Estate of Ardash Marderosian” in the amount of \$30,000.00.

ANSWER: Respondent admits the allegations of this paragraph.

11. On July 26, 2018, Respondent deposited check number 1397, which represented the settlement funds, into Respondent's client trust account.

ANSWER: Respondent admits the allegations of this paragraph.

12. On July 27, 2018, Respondent transferred \$10,000.00, allegedly representing his attorney's fees, into Respondent's operating account as payment for Respondent's work in connection with his representation of the Estate of Ardash Marderosian.

ANSWER: Respondent admits the allegations of this paragraph.

13. On June 27, 2019, prior to any authorized disbursement of the \$30,000.00 in settlement funds, the balance in Respondent's client trust account fell to \$0.07, as Respondent had used almost the entire \$30,000.00 of settlement funds for his own business or personal purposes.

ANSWER: Respondent admits the paragraph through the second comma (after “\$0.07”), but denies the remainder of the paragraph.

14. At no time did Marderosian authorize Respondent to use any portion of the remaining \$30,000.00 in settlement funds for Respondent's own business or personal purposes.

ANSWER: Respondent denies the allegations of this paragraph.

15. Respondent's conduct in using the \$30,000.00 constituting settlement funds received in connection with his representation of the Estate of Ardash Marderosian without authority constitutes conversion.

ANSWER: Respondent denies the allegations of this paragraph.

16. At the time Respondent used the \$30,000.00, as set forth above, Respondent knew that he was using those funds without authority. At the time Respondent used the \$30,000 in settlement proceeds for his own business and personal purposes, he acted dishonestly because he knew that he was using those funds without authority.

ANSWER: Respondent denies the allegations of this paragraph.

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

- a. failing to hold property of a client or third person that is in the lawyer's possession in connection with a representation separate from the lawyer's own property, by conduct including converting \$30,000.00 of the settlement funds to his own business or personal use, by causing the balance in Respondent's client trust account to fall below the amount then belonging to the Estate of Ardash Marderosian, in violation of Rule 1.15(a) of the Illinois Rules of Professional Conduct (2010); and
- b. conduct involving dishonesty, fraud, deceit or misrepresentation, by conduct including knowingly converting \$30,000 of the settlement funds to the Respondent's own use, without authorization, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

ANSWER: Respondent denies the allegations of this paragraph, including subparagraphs a

and b therein.

COUNT II

18. The Administrator realleges and incorporates paragraphs 1 through 17 above as if set forth verbatim herein.

ANSWER: Respondent restates and incorporates the answers to paragraphs 1 through 17 above as if set forth herein.

19. On March 21, 2023, Catherine Marderosian, Marderosian's sister and an heir to the Estate of Ardash Marderosian, sent an email to Respondent which, in part, requested that he provide proof that the settlement funds remained in his client trust account.

ANSWER: Respondent admits, on information and belief, that Catherine Marderosian is Marderosian's sister. Respondent lacks sufficient information to state whether Catherine Marderosian has been declared "an heir" to the estate at any time and therefore neither admits nor denies this allegation. Respondent admits that he received a number of emails from Catherine Marderosian or an email account attributed to her, but lacks sufficient information due to loss of portions of Respondent's email records to either admit or deny the date of any specific email and therefore demands strict proof thereof.

20. In response to Catherine Marderosian's email, on or about March 22, 2023, Respondent produced what he claimed to be a statement from his client trust account dated February 28, 2023, which purportedly showed an opening balance of \$52,451.50 and a closing balance of \$48,431.51 in his client trust account.

ANSWER: Respondent admits that he sent a number of emails to Catherine Marderosian (always also including Marderosian) or an email account attributed to her (always also including Marderosian), but lacks sufficient information due to loss of portions of Respondent's email

records to either admit or deny the date of any specific email and therefore demands strict proof thereof. Respondent admits that at some point during the representation at issue, Respondent sent bank account statements to Marderosian.

21. On January 14, 2025, Administrator served a subpoena upon Old Second National Bank for certain records in connection with this matter.

ANSWER: Respondent lacks sufficient information to either admit or deny that a subpoena was served and therefore neither admits nor denies but demands strict proof.

22. On or about February 3, 2025, Old Second National Bank produced documents responsive to the Administrator's subpoena as set forth in paragraph 21, including account statements for Respondent's trust account for the time period of June 1, 2018, through December 31, 2024.

ANSWER: Respondent lacks sufficient information to either admit or deny that a subpoena was served or of any results of any subpoena and therefore neither admits nor denies but demands strict proof.

23. The statement from Respondent's client trust account dated February 28, 2023, produced by Old Second National Bank shows an opening balance of \$1.50 and a closing balance of \$1.51.

ANSWER: Respondent lacks sufficient information to either admit or deny that a subpoena was served or of any results of any subpoena and therefore neither admits nor denies but demands strict proof.

24. Respondent knew that the statement as described in paragraph 20 was false because he or someone at his direction altered the statement for the purpose of deceiving Steven and Catherine Marderosian. When Respondent altered his client trust account statement and sent it to Steven and Catherine Marderosian, he did so dishonestly.

ANSWER: Respondent denies the allegations of this paragraph.

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

- a. conduct involving dishonesty, fraud, deceit, or misrepresentation, by knowingly providing altered client trust account statements to Steven Marderosian and Catherine Marderosian, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

ANSWER: Respondent denies the allegations of this paragraph, including subparagraph a therein.

WHEREFORE, the Respondent respectfully requests that this matter be assigned to a panel of the Hearing Board, that a hearing be held, and that the panel make findings of fact and law, and a recommendation for no discipline is warranted.

RULE 231 RESPONSES

Pursuant to Commission Rule 231, requiring the following information in a separate section in the answer related to respondent's professional background:

- a. Respondent has been admitted to practice law before the following:
 1. Iowa Supreme Court, April 19, 2004 (exempt as no longer practicing in Iowa);
 2. U.S. Northern District of Illinois General Bar, October 7, 2005;
 3. U.S. Northern District of Illinois Trial Bar, October 7, 2005; expired March 28, 2024
 4. Seventh Circuit U.S. Court of Appeals, 2004
 5. U.S. Southern District of Indiana, October 24, 2006

b. Respondent has received Title Agent Licenses from the Illinois Department of Financial and Professional Regulation as follows:

1. No. TA.08.4007560, 2022
2. No. TA.08.4006328, 2021
3. No. TA.04.4004258, 2019
4. No. TA.18.4000478, 2015

Respectfully submitted,

/s/ Eric J. Ryan

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AFFIDAVIT OF INSUFFICIENT INFORMATION

I, Eric J. Ryan, certify pursuant to Section 2-610 of the Illinois Code of Civil Procedure (735 ILCS 5/2-610) and §1-109 of the Illinois Code of Civil Procedure (735 ILCS 5/1-109) that I lack sufficient information to answer those paragraphs of my Answer to the Complaint in this matter in which such lack is indicated in my answer.

Under penalties as provided by law pursuant to § 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

/s/ Eric J. Ryan

Date: April 15, 2025

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