

**In re Adrian Murati**  
Respondent-Appellant

Commission No. 2023PR00026

**Synopsis of Review Board Report and Recommendation**  
(July 2025)

The Administrator filed an eight-count disciplinary Complaint against Respondent, alleging that he abandoned his law practice and clients' files; failed to comply with court orders; made false statements to clients and the court; provided false documents to a client; misappropriated \$14,910; and failed to respond to the ARDC's demand for information, in violation of Rules, 1.3, 1.4(a)(3), 1.15(a), 1.15(d), 1.16(d), 3.3(a)(1), 8.1(b), 8.4(c), and 8.4(d) of the Illinois Rules of Professional Conduct (2010).

The Hearing Board found that Respondent committed almost all of the charged misconduct and recommended that Respondent be disbarred.

Respondent appealed, arguing that the Chairperson of the Hearing Board Panel erred by denying Respondent's Motions to Continue the Hearing, which Respondent filed on July 15, and July 25, 2024. Respondent did not challenge the Hearing Board's findings of misconduct or the recommendation that Respondent be disbarred.

The Review Board rejected Respondent's arguments, and found that the Chairperson did not err by denying Respondent's July 15 and July 25, 2024 Motions to Continue because Respondent failed to establish there were extraordinary circumstances justifying the continuance of the hearing. The Review Board also found that Respondent's due process rights were not violated.

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

In the Matter of:

**ADRIAN MURATI,**

Respondent-Appellant,

No. 6321187.

Commission No. 2023PR00026

**REPORT AND RECOMMENDATION OF THE REVIEW BOARD**

**SUMMARY**

The Administrator filed an eight-count disciplinary Complaint against Respondent, alleging that he abandoned his law practice and clients' files; failed to comply with court orders; made false statements to clients and the court; provided false documents to a client; misappropriated \$14,910; and failed to respond to the ARDC's demand for information, in violation of Rules, 1.3, 1.4(a)(3), 1.15(a), 1.15(d), 1.16(d), 3.3(a)(1), 8.1(b), 8.4(c), and 8.4(d) of the Illinois Rules of Professional Conduct (2010).

Respondent, who was pro se during the disciplinary proceedings, filed an Answer to the disciplinary Complaint, in which he admitted some of the factual allegations, but denied all allegations of misconduct.

The disciplinary hearing was held on July 25, 2024. Respondent did not appear at the hearing and was not represented by counsel. The Administrator presented testimony from seven witnesses, and presented twenty-two exhibits that were admitted.

**FILED**

July 30, 2025

**ARDC CLERK**

The Hearing Board found that Respondent engaged in all of the misconduct charged in the Complaint, except for two charges included in Counts I and II of failing to keep certain clients reasonably informed. The Hearing Board recommended that Respondent be disbarred.

Respondent appealed, pro se, arguing that the Hearing Board Panel, through its Chairperson (“Chair”), erred by denying Respondent’s Motions to Continue the Hearing, which Respondent filed on July 15, and July 25, 2024. Respondent argues that the case should be remanded. Respondent does not raise any other issues on appeal. Respondent did not file a Reply brief.

The Administrator argues that the Chair did not err in denying Respondent’s motions, and the case should not be remanded. The Administrator requests that this Panel affirm the Hearing Board’s finding of misconduct, and the recommendation that Respondent be disbarred.

For the reasons that follow, we reject Respondent’s arguments, and find that the Hearing Board did not abuse its discretion by denying Respondent’s July 15 and July 25, 2024 Motions to Continue the Disciplinary Hearing. We also find that Respondent’s due process rights were not violated. Although we agree with the Hearing Board’s findings of misconduct and the recommendation that Respondent be disbarred, these issues are not before us on appeal, and therefore, we do not address them further.

### BACKGROUND

The facts and procedural background are fully set out in the Hearing Board's report and are summarized only to the extent necessary here.

#### Respondent

Respondent was admitted to practice law in Illinois in 2015. Respondent had a law firm known as the Law Office of Adrian Murati, in Rockford, Illinois. He was a sole practitioner until

2020, when he entered into a partnership with another attorney. Respondent's practice primarily focused on personal injury and immigration matters. Respondent has no prior discipline.

### The Disciplinary Proceedings

The only issues on appeal concern the Chair's denial of Respondent's Motions to Continue the Hearing, which were filed on July 15, and July 25, 2024. Set forth below is a summary of the disciplinary proceedings between May 2023 and July 2024.

- On May 9, 2023, the Administrator filed a disciplinary Complaint in this matter. (Common Law Record ("C.") at 10-38.) On June 1, Respondent filed his Answer, admitting most allegations, denying some, and stating insufficient knowledge as to other allegations. (C. 50-57.)
- On June 23, 2023, Respondent made an oral motion for an extension of time to respond to the Administrator's Notice to Produce documents. The Chair granted that motion and ordered Respondent to respond to the Administrator's Notice to Produce documents on or before July 24. The Chair also ordered Respondent to advise the Administrator on or before July 24, of any depositions he intended to take. (C. 60-62.) As of December 6, 2023, Respondent had failed to comply with this Order. (See C. 83-85 at Par. 1.)
- On July 28, 2023, the Chair issued an Order setting the disciplinary hearing for January 26, 2024. (C. 65-66.)
- On November 17, 2023, at a pre-hearing conference, Respondent made an oral motion to continue the hearing. The Chair issued an Order directing Respondent to file a written Motion to Continue the Hearing, with an affidavit pursuant to Commission Rule 272 and supporting documentation, on or before December 1. (C. 70-72, 83. )<sup>1</sup>
- On December 1, 2023, Respondent filed a written Motion to Continue the Hearing, based on his medical condition, (C. 73-75), to which the Administrator's counsel filed an objection. (C.

81-85.) Respondent did not submit an affidavit or any supporting documentation, as ordered. On December 8, the Chair issued an Order denying the Motion, stating, “Respondent’s Motion is denied on the following basis: Respondent did not submit any evidence in support of his contentions, nor did Respondent provide an affidavit pursuant Commission Rule 272.” (C. 93-94.) On December 14, without leave, Respondent filed an affidavit and medical records with nine exhibits. (C. 99-146.)

- On December 15, 2023, a pre-hearing conference was held, and Respondent made an oral motion to renew and supplement his motion to continue the hearing. Nevertheless, on that same date, the Chair issued an order granting Respondent’s motion, stating, “Respondent’s Motion to Continue Hearing is granted with the understanding that no further continuances will be allowed.” Also, the Chair rescheduled the disciplinary hearing to April 18 and 19, 2024. (C. 147-49.)

- On April 9, 2024, Respondent filed an emergency motion to continue the hearing, which was scheduled for April 18, because he had been arrested for writing a bad check, and the arraignment was set for the same day as the disciplinary hearing. (C. 228-34.) The Administrator objected to Respondent’s motion, arguing that Respondent knew on April 4 that the arraignment had been set for April 18, and Respondent took no substantive steps to continue the arraignment. (C. 237-39.)

- On April 12, the Chair granted Respondent’s motion to continue the hearing (C. 240-41); and at an April 19 pre-hearing conference, the Chair issued an Order rescheduling the hearing to July 25 and July 26, 2024. (C. 242-43.)

- On July 15, 2024, Respondent filed with the Illinois Supreme Court, and pursuant to Rule 758, a Motion to Transfer to Inactive Status, attaching fourteen exhibits (including several filings with the Commission and his medical records). (M.R. 0322321) (C. 249-97.) Pursuant to a Supreme

Court Order (R. 248), the Administrator filed a response. (C. 363-425.) Accordingly, on July 22, when the Supreme Court denied Respondent's motion (C. 435), the Court had before it all of Respondent's relevant records, including his medical records.

- On July 15, less than two hours after Respondent's filing in the Supreme Court that morning, he filed his third Motion to Continue [the] Hearing before the Commission (C. 351-355), citing in part, his filing in the Court, attaching the Rule 758 motion with the 14 exhibits. Respondent argued that the disciplinary hearing should be delayed because he had filed the Rule 758 motion earlier that morning, requesting the transfer to the disability inactive status. On July 19, the Administrator filed his "Objections" to the Transfer (R. 424-34), attaching two exhibits (including the Supreme Court filing).

- On the same date that the Supreme Court denied Respondent's Rule 754 motion (July 22, 2024), the Chair denied Respondent's July 15 Motion to Continue the Hearing, stating, "Respondent's Motion fails to establish the requisite extraordinary circumstances for a continuance and is denied." (C. 436-37.) On appeal, Respondent challenges the Chair's denial of this motion.

- On July 25, 2024, at 5:26 a.m., as discussed below, Respondent filed an Emergency Motion to Continue [the] Hearing, stating that he had traveled to Albania, and he was unable to get a return flight to Chicago due to a global technological outage on July 19, which had caused numerous flights to be cancelled or delayed. (C. 440-45.)

- On July 25, 2024, the disciplinary hearing was held. Respondent did not attend the hearing. During the hearing, the Chair orally denied Respondent's Emergency Motion to Continue the Hearing. (R. 6-8.)

- On July 26, 2024, the Chair issued a written Order denying Respondent's July 25, 2024 Emergency Motion to Continue, stating, in part, "Respondent did not credibly demonstrate

extraordinary circumstances that would justify a continuance .... Respondent's motion is problematic and unreliable for several reasons .... Respondent's Motion [also] lacks credibility.” (C. 450-52 .) On appeal, Respondent challenges the Chair's denial of this motion.

#### The Hearing Board's Findings of Misconduct

The Hearing Board found that Respondent engaged in almost all of the misconduct charged in the Complaint. (Hearing Bd. Report at 4-24.) The Hearing Board recommended that Respondent be disbarred. (*Id.* at 26-29.) Respondent does not challenge the Hearing Board's findings of misconduct or the recommendation that Respondent be disbarred. The Hearing Board found that Respondent engaged in the following misconduct:

**Count 1:** Respondent failed to protect his clients' interests upon terminating representation of certain clients, and he engaged in conduct prejudicial to the administration of justice, in violation of Rules 1.16(d) (failing to protect a client's interests), and 8.4(d) (conduct prejudicial to the interests of justice). (Hearing Bd. Report at 7-8.)

As of May 2022, approximately thirty of Respondent's cases had been dismissed for lack of prosecution. Respondent's law firm partner testified that although he was able to salvage most of the cases, there were three or four cases that he could not save. Respondent did not tell his partner that any cases had been dismissed for lack of prosecution, and Respondent made false statements to his partner about the status of certain cases.

Between approximately June and December 2022, Respondent abandoned his law practice, his client files, and his law office. In 2023, the ARDC was appointed to be the Receiver for Respondent's practice, and his partner turned over Respondent's paper files to the ARDC.

**Count II:** Respondent represented a client in a negligence case against a hospital. Respondent failed to comply with discovery deadlines; he failed to respond to the defendant's

motion to compel; he failed to comply with court orders; and he failed to appear in court, which resulted in joint monetary sanctions against Respondent and his client, and the dismissal of his client's lawsuit, in violation of Rule 1.3 (failing to act diligently). (Hearing Bd. Report at 8-10.)

**Count III:** Respondent failed to file a worker's compensation claim on behalf of a client; Respondent failed to tell his client that the claim was not filed; Respondent falsely represented that he was talking to the insurance adjuster about the claim and everything was moving forward; Respondent subsequently falsely represented that the matter had been settled; and he gave his client a falsified settlement agreement and settlement check, which was returned for insufficient funds, in violation of Rules 1.4(a)(3) (failing to keep a client reasonably informed), and 8.4(c) (dishonesty). (Hearing Bd. Report at 10-14.)

**Count IV:** Respondent agreed to represent a client in a personal injury matter arising from a car accident, and Respondent filed a complaint on his client's behalf. Respondent never served the defendant, and he voluntarily dismissed the client's complaint. Respondent failed to tell his client that he had not served the defendant and the case had been dismissed; instead, Respondent falsely represented to his client that he was working on the case and discussing settlement with the insurance company, in violation of Rules 1.4(a)(3) (failing to keep a client reasonably informed), and 8.4(c) (dishonesty). (Hearing Bd. Report at 14-16.)

**Counts V and VI:** Respondent dishonestly misappropriated settlement funds from two personal injury lawsuits, filed on behalf of a client and her husband, totaling \$12,527, in violation of Rules 1.15(a) (misappropriation of funds), 1.15(d) (withdrawal of funds), and 8.4(c) (dishonesty). (Hearing Bd. Report at 16-19.)

Respondent prepared settlement statements reflecting that a total of \$12,527 was owed to a company (a litigation lender), which had loaned money to the clients. Respondent deposited the



funds owed to that company into his trust account. (Ans. at Pars. 101, 139.) Respondent subsequently made disbursements from his trust account for his own business and personal purposes, without authorization, which resulted in the trust account having a negative balance. Respondent never paid the company the \$12,257 that was owed to it.

**Count VII:** Respondent converted \$2,393 of client funds; he also made a false statement to a tribunal by filing a false proof of service with the court, in violation of Rules 1.15(a) (misappropriation of funds), 3.3(a)(1) (making a false statement to a tribunal), and 8.4(c) (dishonesty). (Hearing Bd. Report at 19-22.)

Respondent agreed to represent a client in a landlord-tenant matter, and the client paid Respondent \$2,393 as a retainer and for costs. Respondent agreed to deposit those funds into his client trust account, but instead, deposited them into his operating account, thereby converting those funds.

Respondent also filed a complaint in small claims court on his client's behalf, and filed a proof of service, showing that the defendants had been served with the complaint and a summons to appear. The court entered a default judgment against the defendants. The defendants subsequently moved to vacate the default judgment, asserting that they had never been served, and the court vacated the default judgment. The court found that Respondent's proof of service was false and fraudulent, and no service had taken place.

**Count VIII:** Respondent failed to respond to two letters sent by the Administrator requesting information about one of Respondent's client matters; he also failed to comply with a subpoena to appear for a sworn statement in June 2022; and he failed to comply with a second subpoena, by failing to appear for a sworn statement in November 2022, in violation of Rule 8.1(b) (failing to respond to a lawful demand for information). (Hearing Bd. Report at 22-24.)

### The Hearing Board's Findings Concerning Aggravation and Mitigation

The Hearing Board found several aggravating factors, which included the harm that Respondent caused to his clients and his partner; Respondent's failure to make restitution; and his actions during the disciplinary proceedings, which included engaging in delay tactics, and failing to appear for the hearing. (*Id.* at 24-27.) The Hearing Board stated, "Nothing in the record before us gives us confidence that Respondent ... is willing or able to practice in conformance with ethical rules." (*Id.* at 28-29.)

In terms of mitigation, the Hearing Board found that Respondent had no prior discipline. (*Id.* at 25.) The Hearing Board also found that, although Respondent indicated in pleadings that he had drug and mental health problems, the evidence was insufficient to provide any mitigation. (*Id.* at 24.) Respondent does not challenge the Hearing Board's findings concerning aggravation and mitigation.

### ANALYSIS

The Chair's procedural rulings are ordinarily reviewed for an abuse of discretion. *See In re Chiang*, 2007PR00067 (Review Bd., Jan. 30, 2009) at 10, *petition for leave to file exceptions denied*, M.R. 23022 (June 8, 2009). The denial of a motion to continue will not be reversed unless the Chair abused her discretion. *See In re Duric*, 2015PR00052 (Review Bd., Jan. 26, 2021) at 7, *petition for leave to file exceptions denied*, M.R. 030734 (May 18, 2021). Respondent must show that no reasonable person would have taken the Chair's position and denied Respondent's request to continue the disciplinary hearing. *See In re Franklin*, 2019PR00068 (Review Bd., Jan. 20, 2022) at 10, *petition for leave to file exceptions denied*, M.R. 031177 (May 19, 2022). Additionally, Respondent bears the burden of providing sufficient competent evidence to establish that

extraordinary circumstances exist to warrant a continuance. *See In re Duric*, 2015PR00052 (Review Bd., Jan. 26, 2021) at 9.

As stated, Commission Rule 272, which addresses the issue of continuances, states, “The Chair may continue a hearing ... at the Chair's discretion. No hearing ... shall be continued at the request of any party except upon written motion supported by affidavit. No hearing shall be continued at the request of a party except under extraordinary circumstances.” See n.1.

On appeal, Respondent argues that the Hearing Board, through the Chair, erred by denying Respondent’s Motions to Continue the Hearing, filed on July 15 and July 25, 2024. Respondent also argues that the Hearing Board violated Respondent’s due process rights by denying the July 15, 2024 Motion to Continue. Respondent argues that this case should be remanded to a new hearing panel with an advisory opinion that Respondent should first be given a hearing to determine whether he should be transferred to inactive status. Alternatively, Respondent argues that the case should be remanded so that he can present mitigating evidence.

For the reasons set forth below, we reject Respondent’s arguments, and find that the Hearing Board did not abuse its discretion in denying Respondent’s Motions to Continue. Respondent has the burden of proof to show that there were extraordinary circumstances to warrant a continuance, and Respondent did not meet that burden for either motion. We also find that Respondent’s due process rights were not violated. We address Respondent’s July 25, 2024 Emergency Motion first, and then we address his July 15, 2024 Motion, since that is the order in which Respondent addressed the Motions in his appellate brief.

#### Respondent’s July 25 Motion to Continue

Respondent argues that the Chair abused her discretion in denying Respondent’s July 25, 2024 Emergency Motion to Continue [the] Hearing (“July 25 Motion”). That argument lacks merit.

## The Motion

On July 25, 2024, at 5:26 a.m. (on the day of the hearing), Respondent filed his emergency July 25 Motion, in which Respondent claimed he was stranded in Albania, and could not attend the hearing in person or remotely. In his Motion, Respondent stated:

NOW COMES the Attorney-Respondent, ADRIAN MURATI, and hereby brings this Emergency Motion to Continue Hearing set for July 25-26, 2024. In support of this motion, Attorney-Respondent states the following:

1. [A]ttorney-Respondent did not have access to a computer or laptop and had to draft this motion on a cell phone while at or near the airport.
2. Attorney-Respondent is presently in Albania and was unable to secure a return flight back to the United States in time to attend the hearing in this matter on July 25, 2024, due to the 'CrowdStrike global tech outage' which resulted in thousands of cancelled or delayed flights into the United States.
3. On July 5, 2024, Attorney-Respondent's mother informed him that his great-aunt died. See attached screenshot of text message exchange between Attorney-Respondent and his mother.
4. Attorney-Respondent travelled to Albania on July 15, 2024, in part to attend the funeral of his great aunt in the neighboring country of Macedonia. See attached boarding pass for flight from Munich, Germany to Tirana, Albania.
5. On or about July 19, 2024, a global tech outage grounded the majority of flights within the United States, as well as international flights to the United States. See CNN article entitled 'Hundreds of US flights are cancelled for the 4th straight day. Here's the latest on the global tech outage' which states 'Over 1,000 flights into, within or out of the United States were canceled Monday, and over 9,000 were delayed, according to flight tracking site FlightAware. Delta passengers have been slammed by more than 4,400 cancellations since Friday, including more than 950 as of Monday evening, by far the most of any airline.' Accessible at the following URL - [https://amp.cnn.com/cnn/2024/07/22/us/microsoft-power-outage-crowdstrike-it\\_](https://amp.cnn.com/cnn/2024/07/22/us/microsoft-power-outage-crowdstrike-it_)
6. Due to the global tech outage and ongoing flight delays, Attorney-Respondent has been unable to return to the United States in a timely manner to attend the hearing currently set in this matter on July 25, 2024.
7. The unprecedented global tech outage affecting airlines and preventing Attorneys-Respondent from returning to the United States in a timely manner

constitutes an ‘extraordinary circumstance’ warranting a short continuance to allow Attorney-Respondent to return to the United States.

8. Due to technology limitations, including limited access to internet and phone usage, Attorney-Respondent would be unable to remotely attend the hearing and meaningfully participate.
9. Wherefore, Attorney-Respondent respectfully requests a short continuance of 1-2 weeks to allow him to return to the United States and to physically attend the hearing.

(C. 440-41.)

Respondent attached three documents to the July 25 Motion: (1) “Respondent’s Affidavit”, which was a two-paragraph affidavit stating that the information in the Motion was correct, but providing no additional information; (2) a document appearing to be a text message, which stated, “Teze Xhija died. We have not told mom yet” and a response stating, “Ok sorry to hear;” and (3) a document that appears to be a Lufthansa Airline boarding pass in Respondent’s name for a flight from “MUC” to “TIA” [Munich Airport to Albania Airport], dated “July 16” [with no year provided]. (C. 442-444.)

#### The Chair’s Denial of Respondent’s July 25 Motion

On July 25, 2024, at the beginning of the disciplinary hearing, the Chair noted that Respondent was not present, and no one was there on his behalf. (R. 8.) The Chair asked Counsel for the Administrator whether he objected to Respondent’s July 25 Motion. ( R. 6.) Counsel stated that he did object, and he made the following statements:

Reviewing Respondent's motion, he’s filed an emergency motion saying that he traveled to Albania on July 15th, 2024. I would note that on the same date that he was traveling to Albania, Respondent filed a motion with the Supreme Court to transfer to disability inactive status.

In that motion, he also said he would not be attending today because he was going to be in treatment for his unknown mental health issue.

There’s nowhere in this motion that the Respondent said that his flight was canceled. Nowhere in this motion does he detail any attempts he made to reschedule

his flight. We don't have any proof that Respondent was actually on a flight other than a screen shot of a crumpled-up boarding pass.

There's just not enough information here considering this is the third time Respondent's asking to reschedule this hearing. It's been rescheduled twice in the past. And we have, I believe, seven witnesses that are ready to testify. We have one that traveled from Rockford this morning to be here; and this last-minute attempt to continue the hearing should be denied.

(R. 6-7.)

After hearing Counsel's argument, the Chair orally denied Respondent's Motion, and the hearing proceeded in absentia. ( R. 8.) On July 26, 2024, the Chair entered a written Order, in which the Chair stated:

Respondent's Motion is denied. Respondent did not credibly demonstrate extraordinary circumstances that would justify a continuance. He asserted he could not attend the hearing because he traveled to Albania on July 15, 2024, 'in part' to attend a family member's funeral and was 'unable to secure a return flight back to the United States' due to a technological outage that disrupted many flights. Respondent attached photographs of a text message, dated July 5, 2024, informing him of the family member's death, and a boarding pass for a flight from Munich, Germany to Tirana, Albania bearing Respondent's name and the date '16 JUL.' Although Respondent stated that he drafted his motion on his cell phone, he also stated that he would not be able to attend the hearing remotely due to 'limited access to internet and phone usage.'

Respondent's motion is problematic and unreliable for several reasons. Most significantly, while Respondent included information about the technological outage generally, he did not state that his return flight was cancelled nor did he include any information about his return flight reservation or any efforts to obtain a return flight, thus making it impossible to verify his claimed inability to return for his hearing. Further, Respondent's statement that he went to Albania 'in part' to attend a funeral casts significant doubt on the veracity of his representations about the timing and reasons for his trip. It is also notable that Respondent made no mention of the funeral or his planned travels in his previous motion to continue the hearing, which he filed the same day he purportedly flew to Albania. For all these reasons, Respondent's Motion lacks credibility and is denied.

(C. 450-51.)

We find that the Chair did not abuse her discretion in denying Respondent's Motion, based on the reasons set forth in the July 26 Order. We agree with the Chair that Respondent did not

credibly demonstrate extraordinary circumstances that would justify a continuance. Respondent's motion failed to include key facts and lacked supporting evidence showing that Respondent could not attend the disciplinary hearing in person or remotely.

We find that the Chair's ruling was completely reasonable based on the totality of the circumstances, and specifically because Respondent failed to present supporting evidence for his claims that he could not obtain a return flight to Chicago or attend the hearing remotely, other than Respondent's own self-serving assertions. *See In re Duric*, 2015PR00052 (Review Bd., Jan. 26, 2021) at 11, *petition for leave to file exceptions denied*, M.R. 030734 (May 18, 2021) (stating, "In the final analysis, this Board must determine whether no reasonable person would have taken the hearing panel chair's position and denied Respondent's request to continue his hearing a third time. Based on the totality of the circumstances in which the hearing panel chair made his rulings, we cannot say that no reasonable person would have reached the same rulings under the same circumstances.")

#### Failure to Include Facts and Documents

Respondent did not credibly demonstrate extraordinary circumstances warranting a continuance because Respondent failed to provide certain relevant facts and supporting documentation, including the following:

- Respondent failed to state that he had actually purchased a return ticket to fly back to Chicago in time to attend the hearing. Respondent also failed to provide any documentation showing that he actually had a return ticket, including a copy of that ticket.
- Respondent failed to state that his return flight had been cancelled as a result of the technological outage ("tech outage"), and he failed to provide any

documentation to prove that his return flight had actually been cancelled (e.g., a copy of the airline's notification to him that his flight was cancelled; photographs of the cancellation posted on the airport's flight information screens; or statements from witnesses, who could attest to his flight being cancelled).

- Respondent failed to identify the airline upon which he was travelling, and the date on which that airline resumed operating flights to Chicago after the tech outage was resolved. He also failed to provide information concerning the dates on which other airlines available to him resumed operating flights to Chicago.

- Respondent failed to provide specific details, or documentation, concerning any steps he took to return to Chicago in time for the hearing, after the tech outage, which occurred on July 19, approximately six days before the disciplinary hearing on July 25. Respondent did not identify any contacts or communications that he had with his own airline or other airlines to obtain a ticket to Chicago, and he did not state whether he attempted to travel to another country to obtain a flight back to Chicago. Additionally, he failed to provide documentation to show any attempts to obtain a return ticket (e.g., emails, text messages, and other records or notes, or statements from witnesses, who could attest to his actions). Other than Respondent's own word, there is no evidence that he took any action, or made any effort to find a flight to return to Chicago to attend the disciplinary hearing.



- Respondent requested a continuance of one to two weeks, but he provided no information whether he would return to Chicago by that time. He did not provide any information whether he had obtained a ticket to Chicago. He also failed to provide any details or documentation concerning his travel plans, including the date on which he would arrive in Chicago.

- Additionally, Respondent introduced no supporting evidence that he was unable to participate in the disciplinary hearing remotely, except Respondent's own word that he could not do so. He provided no documentation or witness statements to support his claim that he could not participate remotely.

- Respondent failed to state that he tried to make arrangements to participate remotely, and he failed to provide documentation showing that he had done so. For example, there was no indication that Respondent had attempted to locate (and had been unable to locate) a place that provided cell phone reception or internet access (e.g., a hotel, a café, a library, the airport, or a relative's home).

- Before leaving the country, Respondent did not request permission to participate in the hearing remotely, if he could not be present in person. Moreover, during the six days following the tech outage, Respondent failed to file a motion requesting permission to appear remotely.

- Respondent claimed, "Due to technology limitations, including limited access to internet and phone usage, Attorney-Respondent would be unable to

remotely attend the hearing and meaningfully participate.” (C. 440 at Par. 8.) Contrary to this claim, Respondent stated, “Attorney-Respondent ... [drafted] this motion on a cell phone while at or near the airport.” (*Id.*) Respondent’s claim that he could not participate remotely was undermined by his statement that he prepared the motion on his phone, and the fact that he filed the motion electronically.

- Respondent stated, “Attorney-Respondent travelled to Albania on July 15, 2024, in part to attend the funeral of his great aunt in the neighboring country of Macedonia.” (C.440 at Par. 4.) The July 26 Order addressed that representation, stating, “Respondent’s statement that he went to Albania ‘in part’ to attend a funeral casts significant doubt on the veracity of his representations about the timing and reasons for his trip.” (C. 451.) We agree. Moreover, Respondent failed to provide any details showing that he had actually attended the funeral (e.g., the date of the funeral, the specific location of the funeral, or statements from witnesses that he was at the funeral).

- In his prior Motion to Continue, filed on July 15, Respondent failed to mention that he intended to travel to Albania, even though he filed the July 15 Motion on the same day that he purportedly flew to Albania.

- In his July 15, 2024 Motion to Continue, Respondent stated, “Attorney-Respondent intends to seek mental health treatment and/or rehabilitation efforts and there is the possibility that Attorney-Respondent will be in in-patient treatment

during the hearing currently set for July 25, 2024, and unable to attend.” (C. 351 at Par. 7.) Respondent’s statement that he might be unable to attend the hearing indicates that he was already looking for an excuse to delay the hearing, and suggest that he used the tech outage (rather than the in-patient treatment) as the excuse to achieve that delay.

- In December 2023, when Respondent’s first motion to continue the hearing was granted, the Order made it clear that additional motions to continue were disfavored. The Order stated, “Respondent’s Motion to Continue Hearing is granted with the understanding that no further continuances will be allowed.” (C. 147.) (Emphasis added.) Thus, Respondent was on notice that it was unlikely another continuance would be granted.

- Respondent essentially said, “I’m stranded in another country; take my word for it.” That was not enough to meet his burden.

In sum, Respondent failed to provide relevant facts and corroborating evidence showing that he could not attend the hearing in person or remotely and, therefore, he failed to establish extraordinary circumstances warranting a continuance. Consequently, we find that the Chair did not abuse her discretion by denying Respondent’s July 25 Motion.

#### Respondent’s July 15, 2024 Motion to Continue

Respondent argues that the Chair abused her discretion and violated Respondent’s due process rights by denying his July 15, 2024 Motion to Continue [the] Hearing (“July 15 Motion”).

We reject that argument. As discussed below, we find that the Chair did not abuse her discretion, or violate Respondent's due process rights.

On July 15, 2024, Respondent filed two motions: (1) a motion with the Illinois Supreme Court; and (2) the July 15 Motion to Continue with the Hearing Board (asserting that the hearing should be continued because he had a motion pending before the Court).

As stated, on July 22, the Court denied Respondent's motion. Since that motion was no longer pending before the Court, the Chair denied Respondent's July 15 Motion to Continue.

#### Respondent's Motion Filed with the Illinois Supreme Court

On July 15, 2024, ten days before the scheduled date of the hearing, Respondent filed the Rule 758 motion with the Illinois Supreme Court, and on July 22, the Court denied that motion. By denying Respondent's Motion to Transfer, the Court cleared the way for this case to be considered by the Hearing Board at the scheduled disciplinary hearing on July 25, 2024.

#### Respondent's July 15 Motion to Continue

As stated, shortly after Respondent filed his Motion to Transfer in the Court, he filed his July 15 Motion with the Hearing Board. Respondent optimistically argued that he "would likely be granted a transfer to disability inactive status and disciplinary proceedings would be stayed .... Therefore, proceeding with the hearing while Attorney-Respondent's Motion to Transfer To Disability Inactive Status is pending before the Illinois Supreme Court would likely result in judicial resources being wasted since any decision reached would be moot." (C. 351 at Par. 6.) On July 22, 2024, the Chair denied Respondent's July 15 Motion, stating in an Order, "Respondent's Motion fails to establish the requisite extraordinary circumstances for a continuance and is denied." (C. 436 at Par. 1.) We agree that Respondent failed to show extraordinary circumstances since the basis for his motion no longer existed.

The Court's denial of Respondent's Motion to Transfer (which included fourteen exhibits, including medical records) eliminated the stated reason for delaying the hearing. Thus, the Chair did not abuse her discretion in denying Respondent's July 15 Motion.

#### The Issue of Bias

Respondent also argues (incorrectly and inappropriately) that his July 15 Motion should have been granted based on the (unsubstantiated) personal bias that the Administrator's Counsel had against Respondent, and the Chair should have set the matter for a hearing concerning that bias. Respondent asserts that the personal animus (purportedly) exhibited by Counsel, resulted from events in law school, and constituted extraordinary circumstances. Respondent's arguments have no substantiation and no merit. Moreover, Respondent's unjustified accusation against the Administrator's Counsel has no place in this disciplinary proceeding.

Respondent's argument has no merit for two reasons: (1) the record does not support Respondent's accusation of bias; and (2) in the July 15 Motion, Respondent did not argue that the disciplinary hearing should be continued, or a separate hearing should be scheduled, based on the issue of bias (only in the filing with the Supreme Court), and thus, this issue is forfeited. See O'Shaughnessy-Marcanti, 1996PR00001 (Review Bd., Oct. 16, 1997) at 8, petition for leave to file exceptions denied, M.R. 14249 (Jan. 29, 1998) (stating "Generally, objections not raised in the trial court are deemed forfeited and may not be raised for the first time on appeal.")

Respondent argued that the Administrator's Counsel should recuse himself, but Respondent failed to request that the Hearing Board intervene concerning the issue of recusal. Respondent stated, "ARDC Counsel ... should recuse himself from this matter." (C. 351 at Par. 18.) However, Respondent did not ask the Hearing Board to take any action. Therefore, the Chair had no reason to grant the July 15 Motion based on Respondent's purported accusation of bias.

Respondent also failed to provide support for his claim that Counsel was biased as a result of events that took place in law school, when they were classmates. In his July 15 Motion, Respondent stated, “Attorney-Respondent believes that ARDC Counsel ... bears a personal animus against Attorney-Respondent dating back to events in law school.” (C.351 at Par. 13.) Respondent, however, failed to provide any information about the “events in law school” to support that accusation.

In his appellate brief, Respondent acknowledged that he did not provide information about the events in law school, stating, “Appellant did not include details of the events that would have led ARDC Counsel ... to have a personal animus against Appellant out of courtesy to ARDC Counsel[.]” (Resp. Brief at 7.) Respondent’s failure to include details of the events in law school results in the inference that his claims were unsupported. As such, the Chair had no basis on which to evaluate those claims, and properly rejected the argument.

Moreover, though the case had been pending for more than a year, Respondent failed to raise the issue of bias until ten days before the disciplinary hearing, when he filed the July 15 Motion. His failure to raise the issue at an earlier date further undermines the veracity of his claim.

In sum, we find that the record does not support Respondent's accusations of bias. The record is devoid of evidence that would substantiate Respondent’s claims that the Administrator’s Counsel was biased. We conclude that Respondent’s claims concerning bias were unsubstantiated and unjustified, and constitute an aggravating factor.

#### Inactive Disability Status

Respondent also argues that the Chair should have granted his July 15 Motion and set the matter for a hearing to determine whether Respondent was incapacitated and therefore, eligible to

be transferred to inactive disability status. This argument is forfeited because Respondent failed to assert it in his July 15 Motion. *O'Shaughnessy, supra*.

Additionally, in the Motion to Transfer filed with the Court, Respondent did not ask the Court for a hearing. Instead, Respondent asked the Court simply to enter an order transferring him to inactive status based on the facts set forth in his Motion to Transfer, and the supporting affidavit, which included medical records. In his "Prayer for Relief," Respondent stated, "Movant respectfully requests this Honorable Court to enter an order finding that Movant is incapacitated from practicing law and transfer Movant to disability inactive status." (C. 300 at Par. 37.) The Court properly denied his Motion.

In sum, in his July 15 Motion, Respondent did not assert that the hearing should be continued so that the Hearing Board could hold a separate hearing concerning Respondent's capacity to practice law. Therefore, the Chair had no reason to grant Respondent's July 15 Motion on that basis.

#### Due Process

Finally, Respondent argues that his due process rights were violated because he was not given a hearing to determine whether he should be transferred to disability inactive status. That argument also has no merit.

Generally, in a disciplinary proceeding, due process entitles the respondent to notice of the allegations of misconduct, and a fair opportunity to defend against those allegations. *See In re Chandler*, 161 Ill. 2d 459, 470 (1994).

The due process requirements were fully satisfied in this case. Respondent had fair notice concerning the allegations in this case, and he had a fair opportunity to defend against those

allegations. Accordingly, we find that the record does not support Respondent's argument that his due process rights were violated.

### CONCLUSION

For the foregoing reasons, we reject Respondent's arguments, and find that the Chair did not abuse her discretion by denying Respondent's July 15 and July 25, 2024 Motions to Continue the Hearing. We also find that Respondent's due process rights were not violated.

For this Review Board panel to overturn the Chair's rulings on Respondent's Motions, he needed to show that no reasonable person would have denied these motions. Respondent failed to make such a showing. We agree with the Chair that Respondent failed to establish extraordinary circumstances warranting a continuance.

We also agree with the Hearing Board's findings of misconduct and the recommendation that Respondent be disbarred. However, those issues are not before us on appeal, and therefore, we do not address those issues further .

Respectfully submitted,

J. Timothy Eaton  
Esther J. Seitz  
Scott J. Szala

### CERTIFICATION

I, Michelle M. Thome, Clerk of the Attorney Registration and Disciplinary Commission of the Supreme Court of Illinois and keeper of the records, hereby certifies that the foregoing is a true copy of the Report and Recommendation of the Review Board, approved by each Panel member, entered in the above entitled cause of record filed in my office on July 30, 2025.

/s/ Michelle M. Thome  
\_\_\_\_\_  
Michelle M. Thome, Clerk of the  
Attorney Registration and Disciplinary  
Commission of the Supreme Court of Illinois



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<sup>1</sup> Commission Rule 272 states, “The Chair may continue a hearing ... at the Chair's discretion. No hearing ... shall be continued at the request of any party except upon written motion supported by affidavit. No hearing shall be continued at the request of a party except under extraordinary circumstances.

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

In the Matter of:

**ADRIAN MURATI,**

Respondent-Appellant,

No. 6321187.

Commission No. 2023PR00026

**PROOF OF SERVICE  
OF THE REPORT AND RECOMMENDATION  
OF THE REVIEW BOARD**

I, Andrea L. Watson, hereby certify that I served a copy of the Report and Recommendation of the Review Board on Respondent-Appellant listed at the address shown below by e-mail service on July 30, 2025, at or before 5:00 p.m. At the same time, a copy was sent to Counsel for the Administrator-Appellee by e-mail service.

Adrian Murati  
Respondent-Appellant  
muratilaw@outlook.com

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.

Michelle M. Thome,  
Clerk

/s/ Andrea L. Watson

By: Andrea L. Watson  
Deputy Clerk

**FILED**

July 30, 2025

**ARDC CLERK**