

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

IN THE MATTER OF

CHRISTINE BUSANELLI,

Respondent.

Case No.: 2026 PR 31

FILED

June 24, 2026

ARDC CLERK

AMENDED ANSWER

Respondent, Christine Busanelli, by her attorneys Cooney Corso & Moynihan, LLC, answers the Administrator's Complaint as follows:

COUNT I

(Using Means That Have No Substantial Purpose Other Than to Embarrass, Delay or Burden Another Person and Threatening to Present Criminal and Professional Disciplinary Charges to Gain an Advantage in a Civil Matter)

1. On or around June 28, 2025, Respondent visited a Jewel-Osco grocery store in Plainfield. During her visit, Respondent attempted to claim a reduced price on items she was planning to purchase. Respondent was told that the reduced price was only available to shoppers who used the Jewel-Osco application on their phones, which Respondent did not have. Respondent then requested disability accommodations based on vision issues. Jewel-Osco declined to provide the discount to Respondent.

Answer: Respondent objects to the Administrator's public allegations about whether Respondent has a disability, the nature of the disability, and whether it requires accommodations, and further contends that such allegations should be filed confidentially/under seal in order to preserve and protect her civil rights. Subject to and without waiving this objection, Respondent admits the allegations contained in this paragraph except that the incident occurred in Crown Point, Indiana.

2. Prior to July 10, 2025, Respondent asserted a disability claim against Jewel-Osco by submitting a complaint to the company. The basis of Respondent's claim was that she did not receive the store discount. On July 10, 2025, Jewel-Osco retained an Illinois-licensed attorney with the initials "S.F." to represent it in relation to Respondent's claim and investigate the claim, which included investigating the factual basis for the claim asserted by Respondent.

Answer: Respondent objects to this allegation on the same grounds as she objected to in paragraph 1. Subject to and without waiving this objection, Respondent admits the allegation contained in this paragraph.

3. On July 10, 2025, S.F. sent an email to Respondent in which she stated that Jewel-Osco had retained S.F. to investigate Respondent's claim. S.F. requested that she and Respondent speak on the telephone to discuss Respondent's claim. Respondent, by way of reply email, told S.F. that she was available to talk the following day at 8:00 a.m. Respondent and S.F. spoke the following day at 8:00 a.m.

Answer: Respondent admits the allegation contained in this paragraph.

4. On July 17, 2025, at 8:17 a.m., S.F. sent an email to Respondent in which she stated that she needed to complete her investigation and report her findings to Jewel-Osco, but that she would "anticipate getting back to [Respondent] within the next 14 days at the latest," although she anticipated it would be sooner. At 8:29 a.m., Respondent sent an email to S.F. and responded, "In the interest of transparency – local, state and federal charges will be filed, law enforcement will be notified, and a civil filing will be considered, starting today."

Answer: Respondent admits in part and denies in part the allegations contained in this paragraph. Respondent admits that on July 17, 2025, at 8:17 a.m., S.F. sent her the quoted email, and that at 8:29 a.m., Respondent replied. Respondent denies that her reply

email is correctly quoted in this paragraph. Respondent’s actual reply email stated: “in the interest of transparency – local, state and federal charges will be filed, law enforcement will be notified, and civil filing will be considered, starting today,” not “and a civil filing will be considered, starting today” as quoted in the Complaint. The Complaint has inserted the indefinite article “a” before “civil filing,” which does not appear in the original email.

5. On July 23, 2025, at 10:01 a.m., S.F. sent an email to Respondent and conveyed a settlement offer of a \$200 store gift card from Jewel-Osco. At 10:06 a.m., Respondent replied:

“Thanks for letting me know. I have held off on taking other action as a courtesy.

But now, the illegal and age discriminatory behavior will be reported to all necessary parties and agencies at the state and federal levels, law enforcement, and the media, of course.

Please place all security and surveillance footage on hold for possible subpoena action.

Please inform your client of all the above.

Christine, MBA, JD
Attorney-at-Law”

Answer: Respondent admits in part and denies in part the allegations contained in this paragraph. With regard to the allegation contained in the first sentence of this paragraph, Respondent admits that on July 23, 2025, at 10:01 a.m., S.F. sent her an email referencing a \$200 store gift card from Jewel-Osco, and admits that the Complaint correctly quotes verbatim Respondent’s 10:06 a.m. reply email. Respondent denies the allegation to the extent it states or implies that a new settlement offer was conveyed for the first time by S.F. in the July 23, 2025, 10:01 a.m. email. S.F.’s email actually stated: “Regarding your settlement demand, at this time my client is not going to be increasing its last offer of a \$200 store gift card but it will keep that offer open if you want to accept it.” S.F. therefore did not

“convey” a new \$200 offer on July 23, 2025; rather, she declined to increase a prior \$200 offer and indicated that the prior offer remained open. The \$200 gift card was a pre-existing standing offer being held open in response to a prior higher demand from Respondent.

With regard to the second sentence of this paragraph, Respondent admits the allegation.

6. As of July 28, 2025, Respondent’s claims relating to the June 28, 2025, incident remained pending. On July 28, 2025, at 8:29 a.m., Respondent sent an email to S.F. in which she stated that Jewel-Osco had discriminated against her again at a different Jewel-Osco store, located in Crown Point, Indiana. S.F. replied at 8:37 a.m. and requested details, including the store number and the nature of the alleged discrimination, Respondent emailed S.F. at 8:43 a.m. that S.F.’s behavior was “concerning” and, as a result Respondent would report S.F.’s conduct “to the attorney disciplinary commission.”

Answer: Respondent admits in part and denies in part the allegations contained in this paragraph. Respondent admits that as of July 28, 2025, her claims relating to the June 28, 2025, incident remained pending; that she sent an email to S.F. at 8:29 a.m. on July 28, 2025, stating that she had experienced another discriminatory incident at a Jewel-Osco store; that S.F. replied at 8:37 a.m. requesting details; and that Respondent emailed S.F. at 8:43 a.m. with the quoted statements regarding S.F.’s behavior being “concerning” and her intention to report S.F.’s conduct “to the attorney disciplinary commission.” Respondent denies that her 8:29 a.m. email identified Crown Point, Indiana, or any specific store. Her 8:29 a.m. email referenced only that the incident occurred “in a Jewel store” and did not identify any specific location. Respondent further states that the Indiana store location was

later identified in S.F.'s July 30, 2025, email as the Dyer, Indiana store, not Crown Point, Indiana.

7. On July 28, 2025, beginning at 9:05 a.m. and continuing through 1:49 p.m., Respondent sent five emails to S.F. and other partners in S.F.'s law firm in which she made statements including:

- “as stated, I will file with state and federal civil rights agencies and the attorney disciplinary commission now.”
- “[a]s this discriminatory matter is occurring in two states, crossing state lines, it is now a federal matter, and will be reported accordingly. Please advise your client to retain all surveillance video [sic] from federal authorities.”
- “when the court is looking for the footage [from the Jewel-Osco store], and you have not retained it, that [sic] would be because you have been blocking the claims. That’s what I’ll be reporting to the judge.”
- that she would be “sharing [the] information with the attorney disciplinary commission.”

Answer: Respondent admits in part and denies in part the allegations contained in this paragraph. Respondent admits that on July 28, 2025, from 9:05 a.m. to 1:49 p.m., she sent five emails to S.F., and that two of those emails (sent at 9:05 a.m. and 9:34 a.m.) were also sent to other attorneys at S.F.'s law firm. Respondent admits emailing the quoted words set forth in the first, third, and fourth bullet points of this paragraph. Respondent denies the allegations in the second bullet point as quoted. The actual email, sent at 10:09 a.m., stated: “Please advise your client to retain all surveillance video for federal authorities,” not “from federal authorities.” The Complaint’s use of “[sic]” is incorrect, as the original email contains no error requiring such notation.

8. On July 30, 2025, at 5:45 p.m., S.F. sent an email to Respondent in which she stated that Jewel-Osco had provided S.F. with the specific store that Respondent referenced in her email in paragraph seven, above. At 5:53 p.m., Respondent replied and stated:

“As you are well aware, I am not working with you due to your impropriety.

Your continued communications constitute ongoing harassment and will be reported to law enforcement.

As a consequence, I will be forced to report this matter to state and federal authorities, the media, the ARDC, the DOJ, etc.

You can explain to your client your actions which led to these reports.

All surveillance video must be retained for possible subpoena action.

cc: DOJ, IDHR, ICRC, IAG, ARDC”

Answer: Respondent admits in part and denies in part the allegations contained in this paragraph. Respondent admits that on July 30, 2025, at 5:45 p.m., S.F. sent her an email, and that the Complaint correctly quotes verbatim Respondent’s 5:53 p.m. reply email. Respondent denies that S.F.’s July 30, 2025, 5:45 p.m. email stated that Jewel-Osco had provided S.F. with the specific store that Respondent referenced in her emails. The 5:45 p.m. email actually stated that S.F.’s client had informed her that Respondent’s “second alleged claim was reported to the Dyer, Indiana store,” and Respondent’s July 28, 2025, email referenced in paragraph 6, above, did not identify any specific store. Respondent denies that Respondent's emails in paragraph 7 above referenced a specific store.

9. On September 22, 2025, at 7:05 p.m., Respondent sent an email to S.F. in which she stated:

“The status of these two matters is immediately requested.

You have had the investigation material from Jewel for many months, without offering any resolution, which clearly illustrates wrongdoing on your part.

Your delays represent fraud, obstruction of justice, intimidation, retaliation, and harassment.

A resolution is demanded by 5pm [sic] CST 9/24/25.”

Answer: Respondent admits the allegation contained in this paragraph but states that the Complaint's use of “[sic]” is incorrect, because the original email contains no error requiring such notation.

10. On September 23, 2025, between 7:44 a.m. and at 8:05 a.m., Respondent and S.F. exchanged emails about Jewel-Osco’s previous settlement offer of a \$200 gift card, which Respondent rejected. Respondent made a \$5,000 counteroffer, which S.F., on behalf of Jewel-Osco, rejected.

Answer: Respondent admits the allegation contained in this paragraph.

11. On September 23, 2025, at 8:10 a.m., Respondent sent an email to S.F. in which she stated that she doubted S.F. shared her settlement offer with Jewel-Osco and that it was “readily apparent that [S.F. was] committing fraud.”

Answer: Respondent admits the allegation contained in this paragraph.

12. On September 26, 2025, at 1:54 p.m., Respondent emailed S.F. and stated:

“I’m sure by now you’ve heard that there’s another matter which has occurred, which has been reported.

This one constitutes a criminal AND civil violation. The police are handling. [emphasis in original]

Criminal charges are being filed immediately.

I will include you in the criminal action[,] [S.F.], for obstruction of justice, fraud, intimidation, complicity, etc.

The attorney licensing board will also be notified regarding these criminal actions.”

Answer: Respondent admits the allegation contained in this paragraph.

13. Respondent’s statements in paragraphs five, six, seven, eight, nine, 11, and 12, above, had no substantial purpose other than to embarrass, delay or burden S.F.

Answer: Respondent denies the allegation contained in this paragraph.

14. Respondent’s statements in paragraphs five, six, seven, eight, nine, and 12, above, constituted threats to present criminal and professional disciplinary charges in order to obtain an advantage in Respondent’s civil claim against Jewel-Osco.

Answer: Respondent denies the allegations contained in this paragraph.

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

- a. using means that have no substantial purpose other than to embarrass, delay, or burden a third person, by conduct including making the statements described in paragraphs five, six, seven, eight, nine, 11, and 12, above, in violation of Rule 4.4(a) of the Illinois Rules of Professional Conduct (2010); and
- b. presenting, participating in presenting, or threatening to present criminal or professional disciplinary charges to obtain an advantage in a civil matter, by conduct including making the statements in paragraphs five, six, seven, eight, nine, and 12, above, in violation of Rule 8.4(g) of the Illinois Rules of Professional Conduct (2010).

Answer: Respondent denies the allegations contained in this paragraph, including subparts (a) and (b).

COUNT II
(Using Means That Have No Substantial Purpose Other Than to Embarrass, Delay or Burden Another Person)

16. The Administrator realleges and incorporates paragraphs one through 15, above.

Answer: Respondent realleges and incorporates her answers to paragraphs one through 15, above.

17. At all times alleged in this complaint, Jewel-Osco contracted with Sedgewick, a risk assessment and claim management firm, to process grievances or claims filed with Jewel-Osco.

Answer: Respondent lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph, which concern the internal contractual arrangements of Jewel-Osco and a third-party entity, and on that basis denies the allegations.

18. On October 5, 2025, a woman with the initials “L.S.” received a claim file in her capacity as a claims associate at Sedgewick. The file related to Respondent’s claims against Jewel-Osco, described in Count I, above.

Answer: Respondent admits that she spoke to an individual from Sedgwick about her claim and therefore admits that her claim was assigned to someone at Sedgwick. Respondent lacks information sufficient to admit or deny all remaining aspects of this allegation and therefore denies it and demands strict proof thereof.

19. On October 7, 2025, L.S. called Respondent to discuss Respondent’s claim. During that telephone call, Respondent stated, “Same is going to happen here, same as what happened at

United Healthcare.” Respondent’s statement referenced the murder of a United Healthcare Chief Executive Officer in New York City on December 4, 2024.

Answer: Respondent admits in part and denies in part the allegations contained in this paragraph. Respondent admits talking to a Sedgwick representative on the phone regarding the Jewel matter. Respondent also admits that during that phone call, she made a reference to the public exposure of United Healthcare’s claim practices as a comparison to the public exposure of Sedgwick’s claim practices, but denies that she made any statement to the Sedgwick employee which expressed any intent to engage in murder or other bodily harm. Respondent lacks information sufficient to admit or deny that the conversation occurred on October 7, 2025, or that she spoke to a person with the initials L.S., and therefore denies same and demands strict proof thereof.

20. Respondent’s statement in paragraph 19, above, had no substantial purpose other than to embarrass, delay or burden L.S.

Answer: Respondent denies the allegation contained in this paragraph.

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

- a. using means that have no substantial purpose other than to embarrass, delay, or burden a third person, by conduct including making the statement described in paragraph 19, above, in violation of Rule 4.4(a) of the Illinois Rules of Professional Conduct (2010).

Answer: Respondent denies the allegation contained in this paragraph.

AFFIRMATIVE DEFENSE TO COUNT I
(Conformance to the Indiana Rules of Professional Conduct; Illinois Rule 8.5(b)(2) Safe Harbor)

Respondent, Christine Busanelli, for her affirmative defense to Count I, and in particular to the allegation that she violated Illinois Rule of Professional Conduct 8.4(g), states:

1. Respondent is licensed to practice law only in the State of Illinois and is not, and was not at any time relevant to the Complaint, licensed to practice law in the State of Indiana.

2. At all times relevant to the conduct charged in Count I, Respondent resided in the State of Indiana.

3. The e-mail and telephone communications charged in Count I were made by Respondent while she was physically located in the State of Indiana.

4. The communications charged in Count I were not made in connection with any matter then pending before a court or other tribunal.

5. Illinois Rule of Professional Conduct 8.5(b)(2) provides that, for conduct not in connection with a matter pending before a tribunal, the rules of professional conduct of the jurisdiction in which the conduct occurred apply, or, if the predominant effect of the conduct is in another jurisdiction, the rules of that jurisdiction; and that a lawyer shall not be subject to discipline if the lawyer's conduct conforms to the rules of a jurisdiction in which the lawyer reasonably believes the predominant effect of the lawyer's conduct will occur.

6. Respondent reasonably believed that the predominant effect of her conduct would occur in the State of Indiana, where she resided, from which she acted, and where the matter she was pursuing was centered.

7. The Indiana Rules of Professional Conduct do not prohibit a lawyer from presenting, participating in presenting, or threatening to present criminal or professional disciplinary charges to obtain an advantage in a civil matter, and contain no provision analogous

to Illinois Rule of Professional Conduct 8.4(g). Indiana's rules in this respect track the American Bar Association Model Rules of Professional Conduct, which contain no such prohibition.

8. Respondent's conduct charged in Count I conformed to the Indiana Rules of Professional Conduct.

9. Because Respondent's conduct conformed to the rules of professional conduct of the jurisdiction in which she reasonably believed the predominant effect of her conduct would occur, Respondent is not subject to discipline under Illinois Rule of Professional Conduct 8.4(g) for the conduct charged in Count I, pursuant to Illinois Rule of Professional Conduct 8.5(b)(2).

WHEREFORE, Respondent respectfully requests that the charge in Count I alleging a violation of Illinois Rule of Professional Conduct 8.4(g) be denied and dismissed, and that no discipline be imposed upon Respondent on the basis of that charge.

Respectfully submitted,



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