

STATE OF ILLINOIS  
IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT  
COUNTY OF SANGAMON

RONALD STANDRIDGE,	)	
	)	
Plaintiff,	)	
	)	Case No. 2018-L- 2018L 000200
vs.	)	
	)	
ADAM LOPEZ,	)	
	)	
Defendant.	)	
-----	)	
JP MORGAN CHASE,	)	
	)	
Respondent in Discovery.	)	

**VERIFIED COMPLAINT**

Plaintiff Ronald Standridge, by and through his attorney August Appleton, and for his  
Complaint against Defendant Adam Lopez, pleads as follows:

1. Plaintiff Ronald Standridge ("Standridge") is an adult citizen of Illinois residing  
in Sangamon County.

2. Defendant Adam Lopez ("Lopez") is an adult citizen of Illinois residing in  
Sangamon County.

**COUNT I-FINANCIAL EXPLOITATION OF AN ELDERLY PERSON**

3. Plaintiff Ronald Standridge restates paragraphs 1-2 above as paragraphs 1-3 of  
Count I against Defendant Adam Lopez for financial exploitation of an elderly person.

4. At all times relevant, Standridge has been over the age of 60 years old.

5. Standridge met Lopez in 2018 when Standridge and his wife engaged Lopez to  
review quotes for insurance policies on their home and automobile. At the time, Lopez was

employed by a national company providing insurance as well as financial planning and investment services.

6. Standridge and his wife began to trust Lopez as an insurance and investment professional and placed confidence in him when they disclosed Ronald's financial dealings and desire to retire with Lopez.

7. Standridge disclosed to Lopez that he had two Individual Retirement Accounts ("IRAs") in separate financial institutions. Standridge disclosed each account had a little more than \$35,000 in each account and that he hoped that he could retire within the next few years.

8. Lopez advised Standridge that he could "roll-over" both accounts into accounts controlled by Lopez through his capacity as a financial advisor. Lopez stated to Standridge and his wife that he would transfer their money into a "tax deferred" account wherein their investment would turn a profit and they could also receive \$2,000 per month to pay towards their remaining debts.

9. Based upon the representations of Lopez, Standridge liquidated both IRAs and received \$37,321.04 from one account and \$35,844.22 from the other account. Standridge caused both amounts to be deposited in his personal joint checking account shared with his wife.

10. In August 2018, Lopez met with Standridge's wife, who tendered Lopez a check for \$37,321.04. Standridge's wife asked whether she make the check to Lopez' employer and Lopez stated that since Lopez had set up the account in Standridge's name and deposited funds from his "expense account," that the check would be made to him personally. Based upon this representation, Standridge's wife issued a check to Lopez for \$37,321.04.

11. Approximately two weeks later, based upon the same representations by Lopez, Standridge's wife caused a check in the amount of \$35,844.22 to issue to Lopez.

12. Following the distribution of \$73,165.26 to Lopez, Standridge's wife continued to communicate with Lopez, who thanked them for their investment and continued to assert that their funds had been placed into an appropriate investment account.

13. On or around September 14, 2018, Lopez personally delivered a check for \$4,000 to Standridge's home stating that the check was for the August and September 2018 distributions in accordance with the aforementioned investment strategy.

14. On September 17, 2018, Standridge received a letter from Lopez's employer stating he was no longer with that company.

15. Standridge's wife contacted Lopez, and on September 18, 2018, Lopez came to the Standridge home and asserted that funds had been invested in an account with "Jackson National Life Insurance Company." Lopez presented the Standridges with documents alleging to be Standridge's account statements. The Standridges noticed there were no account numbers on this information but Lopez continued to assert that everything was fine, that he had not been terminated and was working things out with his employer, and Standridge's money was secure.

16. In the following days, Standridge learned through local news that Lopez was under investigation by local police and had been fired. Standridge requested the return of his funds through his son, who had introduced him to Lopez.

17. Lopez did not respond to Standridge's request to return funds.

18. Lopez knowingly used deceptive conduct to gain control of Standridge's retirement funds by one or more of the following acts:

- a. Falsely represented that he could "roll-over" Standridge's IRAs into accounts at Lopez's employer that would be tax free and create a monthly dividend of \$2,000;



b. Falsely representing that he had created an account on the Standridge's behalf and that checks from Standridge should be issued directly to Adam Lopez; and/or

c. Falsely representing that Standridge's funds were deposited in an appropriate investment fund through his employer.

19. Upon information and belief, Lopez has illegally used Standridge's funds for personal purposes.

20. Lopez's false representations regarding his use of Standridge's money were knowingly made and caused the Standridge's to transfer funds to Lopez.

21. Standridge's reliance on Lopez's representations was reasonable under the circumstances.

22. Standridge has been damaged in the amount of \$69,165.26, plus additional tax penalties, costs, attorneys fees, and other damages to be quantified after further investigation.

23. Standridge is entitled to treble damages on his actual damages as determined after trial.

**WHEREFORE**, Plaintiff Ronald Standridge respectfully prays that this Court enter judgment in an amount of \$69,165.26, plus additional damages to be determined at trial, attorney's fees, costs, and pre-judgment interest against Defendant Adam Lopez, that the court treble the award at trial in the amount of three times the actual damages, and for all other relief that is just and equitable under the circumstances.

#### **COUNT II-RESPONDENT IN DISCOVERY**

24. Plaintiff Ronald Standridge restates paragraphs 1-23 above as paragraphs 1-24 of Count II naming JP Morgan Chase as a Respondent in Discovery.

25. Respondent in Discovery JP Morgan Chase ("Chase") is a bank doing business in Sangamon County.

26. Defendant Lopez deposited funds from Plaintiff Standridge's IRA accounts into an account at Chase that is controlled by Lopez.

27. Upon information and belief, Lopez has transferred said funds and may be using third parties to assist in dissipating or concealing Standridge's assets.

28. Respondent JP Morgan Chase should be ordered to comply with the discovery requests from Standridge to determine the identity of any third parties receiving the Standridge's funds or otherwise assisting in concealing funds from recovery.

**WHEREFORE**, Plaintiff Ronald Standridge respectfully prays that Respondent in Discovery JP Morgan Chase be ordered to comply with the reasonable discovery requests of the plaintiff, and for all other relief that is just and equitable under the circumstances.

Plaintiff RONALD STANDRIDGE

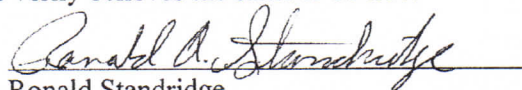
By

His Attorney

AUGUST APPLETON  
*Attorney for Plaintiff*  
725 S. 4<sup>th</sup> Street  
Springfield, IL 62703  
Phone: 217-528-2183  
Att. Reg. No. 6304584  
[AppletonLawIllinois@gmail.com](mailto:AppletonLawIllinois@gmail.com)

#### **VERIFICATION**

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 the foregoing 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.

  
Ronald Standridge

**STATE OF ILLINOIS**  
**IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT**  
**COUNTY OF SANGAMON**

RONALD STANDRIDGE,	)	
	)	
Plaintiff,	)	2018L 000200
	)	
vs.	)	Case No. 2018 L
	)	
ADAM LOPEZ,	)	
	)	
Defendant.	)	
-----	)	
JP MORGAN CHASE,	)	
	)	
Respondent in Discovery.	)	

**SUMMONS**


To the Defendant: Adam Lopez  
1917 Lakeshire Drive  
Springfield, IL 62707

YOU ARE SUMMONED and required to file an Answer in this case, or otherwise plead and file your appearance in the office of the Clerk of this Court - SANGAMON COUNTY COURTHOUSE – 200 S. 9<sup>th</sup> Street, Springfield, IL 62701 within 30 days after service of this summons, not counting the day of service. IF YOU FAIL TO DO SO, A JUDGMENT OR DECREE BY DEFAULT MAY BE TAKEN AGAINST YOU FOR THE RELIEF ASKED IN THE COMPLAINT.

To the officer: This summons must be returned by the officer or other persons to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so indorsed. This summons may not be served later than 30 days after its date.

WITNESS, 10/11/2018, 2018.



  
Clerk of Court

AUGUST APPLETON  
ARDC # 6304584  
725 S. 4th Street  
Springfield, IL 62703  
Phone: 217-528-2183  
AppletonLawIllinois@gmail.com

Date of Service \_\_\_\_\_ 2018.



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COUNTY OF SANGAMON

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Plaintiff,	)	2018L 000200
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vs.	)	Case No. 2018 L
	)	
ADAM LOPEZ,	)	
	)	
Defendant.	)	
-----	)	
JP MORGAN CHASE,	)	
	)	
Respondent in Discovery.	)	

**SUMMONS FOR DISCOVERY**

PLEASE SERVE:

**JP Morgan Chase**  
**1 East Old State Capitol Plaza**  
**Springfield, IL 62701**

Respondent in Discovery.

TO RESPONDENT IN DISCOVERY:

YOU ARE HEREBY NOTIFIED that on October 9, 2018, a complaint, a copy of which is attached, was filed in the above Court naming you as a Respondent in Discovery. Pursuant to the Illinois Code of Civil Procedure Section 2-402 and Supreme Court Rules 201 et. seq, the above named Plaintiffs are authorized to proceed with the discovery of the named Respondents in Discovery.

YOU ARE SUMMONED AND COMMANDED to appear for deposition, before a notary public and to bring all documents on the attached rider.

We are scheduled to take the oral discovery deposition of the above named Respondent, on Tuesday, October 23, 2018, at the hour of 1:00 p.m., at 725 S. Fourth St., Springfield, Illinois, 62703, in accordance with the rules and provisions of this Court.

**NOTE: IN LIEU OF APPEARANCE YOU MAY COMPLY BY FORWARDING COPIES OF ALL RECORDS REQUESTED THE DAY PRIOR TO THE DATE SET FORTH ABOVE.**

Case No. 2018 L  
Page 1 of 2



TO THE OFFICER/SPECIAL PROCESS SERVER:

This summons must be returned by the officer or other person to whom it was given for service, with endorsement or affidavit of service and fees and an endorsement or affidavit of payment to the Respondent of witness and mileage fees, if any, immediately after service. If service cannot be made, this summons shall be returned so endorsed.

10/11/2018

WITNESS, .....

  
Clerk of Court



Date of Service: \_\_\_\_\_, 2018  
(To be inserted by officer on copy left  
with Respondent or other person)

AUGUST APPLETON  
ARDC # 6304584  
725 S. 4th Street  
Springfield, IL 62703  
Phone: 217-528-2183  
AppletonLawIllinois@gmail.com