

## ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION of the SUPREME COURT OF ILLINOIS

One Prudential Plaza 130 East Randolph Drive, Suite 1500 Chicago, Illinois 60601-6219 (312) 565-2600 (800) 826-8625 Fax (312) 565-2320 3161 West White Oaks Drive, Suite 301 Springfield, IL 62704 (217) 546-3523 (800) 252-8048 Fax (217) 546-3785

Robert Thomas Hanlon

Via Email:

Chicago July 11, 2024

Re: Robert Thomas Hanlon

in relation to

Christopher Boehm No. 2024IN02409

Dear Mr. Hanlon:

We have received a communication regarding your conduct from Christopher Boehm. A copy is attached.

We have reviewed the communication and have determined that no action is warranted. We have so advised Mr. Boehm.

As you may know, our file in this matter is private and confidential.

Very truly yours,

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Myrrha B. Guzman Senior Counsel ARDC Intake Division

MBG:kof Attachment



1) an Illinois lawyer;

Use this form to file a complaint about:

## ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION of the SUPREME COURT OF ILLINOIS

## COMPLAINT FORM

Return the completed form	by e-mail, mail or facsimile to:	
ARDC 130 E. Randolph Dr., Ste. 1500 Chicago, IL 60601-6219 or Phone: (312) 565-2600 or (800) 826-8625 Fax: (312) 565-2320 Email: information@iardc.org		ARDC 3161 W. White Oaks Dr., Ste. 301 Springfield, IL 62704 Phone: (217) 546-3523 or (800) 252-8048 Fax: (217) 546-3785 Email: information@iardc.org
1. Your name: Chris Bo	ehm	
Street address:		
City: Findlay	State: IL	Zip: <b>62534</b>
Home phone:	Work phone:	Cell phone:

2. Name of lawyer/person you want to be investigated: Robert T. Hanlon

Name of law firm or business: Former State's Attorney for Shelby County; Currently Netzke Olswang Law Group

Street address: (Based on ARDC Website) - 8605 West Bryn Mawr Suite 309

City: Chicago State: IL Zip: 60631

Phone: (based on ARDC website) 312-622-7325

Email address:

3. Have you previously contacted the ARDC regarding this matter? Yes No

If yes, when and how did you contact us?

4. Did you employ the lawyer/person you are complaining about: Yes \_\_\_\_\_ No \_✓

**4a.** If you answered yes to question 4:

When did the employment start?

What was the fee agreement?

How much have you paid the lawyer/person to date?

**4b.** If you answered no to question 4 what is your connection to the lawyer/person?

Mr. Hanlon is the former State's Attorney for Shelby County.

5. If your request relates to a court case or other proceeding, please provide the following:

Name of court or agency:

Name of case:

Case number:

6. Please explain your complaint(s). Include important dates and names of witnesses and others involved. Use additional pages if necessary. Attach copies of documents that support your complaint, such as fee agreements, receipts, checks, letters and court papers.

During Mr. Hanlon's tenure, several events occurred which seem to be improper. Latest among these events was an apparently improper \$74,030 single payment directed by Mr. Hanlon to Ms. Denise Ambroziak, his First Assistant State's Attorney. This payment has decimated the budget for the current Shelby County State's Attorney, hampering the effective operation of that office.

Mr. Hanlon was the State's Attorney for Shelby County until he resigned in May 2024. (See attached newspaper article). On or about April 26, 2024, Mr. Hanlon entered into a "Separation of Employment Agreement" with Ms. Ambroziak. (See attached agreement). According to that agreement, Mr. Hanlon directed payment to Ms. Ambroziak in the amount of \$74,030 based on certain "guarantee[s]" made by Mr. Hanlon during "original negotiations for the hiring of employee," provisions of which negotiations formed "the original agreement between Employee and the State's Attorney." The agreement continues that, at the time of Mr. Hanlon's resignation, Ms. Ambroziak was on FMLA leave and that, during such leave her termination was unlawful. Nonetheless, according to the agreement, Ms. Ambroziak's termination was required because "the resignation of the State's Attorney automatically serves to sever the appointment of [Ms. Ambroziak] as the First Assistant State's Attorney." Accordingly, Mr. Hanlon authorized payment to Ms. Ambroziak in the amount of \$74,030, which sum was paid.

According to responses to FOIA requests, there was no employment contract between the Shelby County State's Attorney's Office and Ms. Ambroziak, who was apparently an "at-will" employee entitled to no guaranteed payments upon separation. The county board did not approve the payment or the agreement. Moreover, I am not aware of any information indicating that Ms. Ambroziak was on FMLA leave on the date of Mr. Hanlon's resignation. Finally, I have found no authority for Mr. Hanlon's assertion that his resignation required termination of Ms. Ambroziak's employment. Instead, based on the information available, it seems that Mr. Hanlon directed this payment, and Ms. Ambroziak accepted the payment, without any lawful authority or purpose. Mr. Hanlon's payment, and Ms. Ambroziak's acceptance thereof potentially violated 720 ILCS 5/33-3 (Official Misconduct) and potentially violated 720 ILCS 5/33-1 (Bribery).

Mr. Hanlon's and Ms. Ambroziak's conduct potentially constitutes a criminal act reflecting adversely on his and her honesty, trustworthiness, or fitness as a lawyer and involves dishonesty, fraud, deceit, or misrepresentation.

Signature:	_ Date: _	7-1-24

Chris Boehm 1405 E. 2200 North Road Findlay, IL 62534 SPRIMSFIELD IL 587

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ARDC 3161 W. White Oaks Dr., Ste. 301 Springfield, IL 62704