

**2024PR00069**

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

In the Matter of:

LAUREN B. MCQUEEN,  
Attorney-Respondent,  
No. 6331440

Commission No. 2024PR00069

**NOTICE OF FILING**

TO: TAMMY L. EVANS  
Counsel for the Administrator  
Attorney Registration &  
Disciplinary Commission  
3161 West White Oaks Drive  
Springfield, Illinois 62704  
[tevens@iadc.org](mailto:tevens@iadc.org)  
[ARDCeService@iadc.org](mailto:ARDCeService@iadc.org)

**NOTICE OF FILING**

PLEASE TAKE NOTICE that on November 22, 2024, I will e-file the Respondent's Answer to Complaint by causing the original copy to be e-filed with the Clerk of the Attorney Registration and Disciplinary Commission.

Respectfully submitted,

/s/ Samuel J. Manella  
Samuel J Manella  
Attorney for AttorneyRespondent

SAMUEL J. MANELLA, # 06190368  
Counsel for Attorney-Respondent  
7 Buckingham Place  
Lincolnshire, Illinois 60069  
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FILED  
11/22/2024 10:08 AM  
ARDC Clerk

## PROOF OF SERVICE

I, SAMUEL J. MANELLA, on oath state that I served a copy of the Notice of Filing and ANSWER TO COMPLAINT on the individual at the address shown on the foregoing Notice of Filing, sent via e-mail at [tevans@iardc.org](mailto:tevans@iardc.org) and [ARDCeService@iardc.org](mailto:ARDCeService@iardc.org), on November 22, 2024, at or before 4:00 p.m.

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 he verily believes the same to be true.

/s/ Samuel J. Manella

SAMUEL J. MANELLA, # 06190368  
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BEFORE THE HEARING BOARD  
OF THE  
ILLINOIS ATTORNEY REGISTRATION AND  
DISCIPLINARY COMMISSION

In the Matter of: )  
 )  
 LAUREN B. MCQUEEN, )  
 ) Commission No. 2024PR00069  
 Attorney-Respondent, )  
 )  
 No. 6331440. )

**ANSWER TO COMPLAINT**

NOW COMES, Attorney-Respondent, LAUREN B. MCQUEEN, by and through her attorney, SAMUEL J. MANELLA, and hereby files her Answer to Complaint, and states and alleges as follows:

Respondent was licensed to practice law in Illinois on May 9, 2019.

COUNT I

*(Dishonesty – Unauthorized Use of Funds from the Champaign County Bar Association’s Busey Bank Account)*

1. Between May 2019 and May 2021, Respondent was employed as an assistant state’s attorney for Champaign County. Between June 2021 and August 2022, Respondent was employed as an associate attorney with Erwin, Martinkus & Cole, a law firm in Champaign.

**ANSWER:**

**Respondent admits the allegations contained in Paragraph 1 of Count I of the Complaint.**

2. On February 20, 2020, Respondent was elected to the board of the Champaign County Bar Association (“CCBA”).

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**ANSWER:**

**Respondent admits the allegations contained in Paragraph 2 of Count I of the Complaint.**

3. On March 5, 2020, Respondent was elected treasurer of the CCBA and served as treasurer until March 2023, when she was elected president of the CCBA.

**ANSWER:**

**Respondent admits the allegations contained in Paragraph 3 of Count I of the Complaint.**

4. Between February 2020 and December 2022, the CCBA had a self-titled checking account held at Busey Bank (“Busey account”). In August 2022, the CCBA opened a self-titled checking account at Iroquois Federal Bank (“IFB account”). On December 21, 2022, the CCBA closed the Busey account.

**ANSWER:**

**Respondent admits the allegations contained in Paragraph 4 of Count I of the Complaint but is unsure of the exact dates.**

5. Respondent’s duties as treasurer included depositing funds into the Busey and IFB accounts, writing checks and using the debit cards that were issued for the Busey and IFB accounts for CCBA expenses, and reconciling the Busey and IFB accounts monthly. Respondent maintained possession of the debit cards for the Busey and IFB accounts until she resigned as president of the CCBA and as a member of the CCBA board on January 30, 2024.

**ANSWER:**

**Respondent admits the allegation contained in the first sentence of Paragraph 5 of Count I of the Complaint. Respondent admits the allegations in the second sentence that she was the only one with a debit card tied to the accounts and further answering states that Emma Dorantes as the President at the time had a card to the Busey account as well as Colleen Ramais had a card to the IFB account as the Treasurer after Respondent.**

6. Between February 2021 and September 2022, Respondent made the following seventeen (17) cash withdrawals from the Busey account totaling \$4,176:

DATE	TRANSACTION TYPE	AMOUNT
February 25, 2021	Teller cash withdrawal	\$126
March 11, 2021	Teller cash withdrawal	\$40
March 25, 2021	Teller cash withdrawal	\$20
July 28, 2021	ATM withdrawal	\$300
July 28, 2021	ATM withdrawal	\$200
July 29, 2021	ATM withdrawal	\$240
September 24, 2021	Teller cash withdrawal	\$300
January 26, 2022	Teller cash withdrawal	\$300
January 27, 2022	Teller cash withdrawal	\$300
April 8, 2022	Teller cash withdrawal	\$400
April 26, 2022	Teller cash withdrawal	\$200
May 13, 2022	Teller cash withdrawal	\$300
May 27, 2022	Teller cash withdrawal	\$300
July 12, 2022	Teller cash withdrawal	\$300
July 27, 2022	Teller cash withdrawal	\$500
September 9, 2022	Teller cash withdrawal	\$250
September 28, 2022	Teller cash withdrawal	\$100
		<b>Total: \$4,176</b>

**ANSWER:**

**Respondent admits the allegations contained in Paragraph 6 of Count I of the Complaint.**

7. Respondent used the funds described in paragraph six, above, for her own personal or business purposes without authorization.

**ANSWER:**

**Respondent substantially admits the allegation contained in Paragraph 7 of Count I of the Complaint but does not remember making these and she is not sure they were all personal, as there was one event where some of the vendors asked for cash for a softball event.**

8. At no time did the CCBA board or anyone else authorize Respondent to use the funds described in paragraph six, above, for her own personal or business purposes.

**ANSWER:**

**Respondent admits the allegations contained in Paragraph 8 of Count I of the Complaint.**

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

- a. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation by conduct including knowingly using \$4,176 in funds belonging to the CCBA for her own personal or business purposes without authority, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

**ANSWER:**

**Respondent admits the allegations contained in Paragraph 9 (a) of Count I of the Complaint.**

## COUNT II

*(Dishonesty – Unauthorized Use of Funds from the Champaign County Bar Association’s Iroquois Federal Bank Account)*

10. The Administrator realleges and incorporates paragraphs 1 through 8, above.

**ANSWER:**

**Respondent realleges and incorporates answers to Paragraphs 1 through 8 above.**

11. Between August 2022 and February 2024, Respondent was employed as an associate attorney with Meyer Capel, a law firm in Champaign. Meyer Capel terminated Respondent in February 2024. Respondent is currently employed as an assistant state’s attorney for Edgar County.

**ANSWER:**

**Respondent admits the allegations contained in Paragraph 11 of Count II of the Complaint.**

12. Between September 12, 2022, and July 31, 2023, Respondent made the following cash withdrawals and purchases from the IFB account totaling \$5,136.71:

DATE	TRANSACTION TYPE	AMOUNT
September 12, 2022	Teller cash withdrawal	\$1,000
October 27, 2022	ATM withdrawal	\$203
October 27, 2022	ATM fee	\$1
October 27, 2022	ATM withdrawal	\$203
October 27, 2022	ATM fee	\$1
October 27, 2022	ATM withdrawal	\$103
October 27, 2022	ATM fee	\$1
October 31, 2022	ATM withdrawal	\$203
October 31, 2022	ATM fee	\$1
October 31, 2022	ATM withdrawal	\$203
October 31, 2022	ATM fee	\$1
October 31, 2022	ATM withdrawal	\$103

October 31, 2022	ATM fee	\$1
October 31, 2022	Debit card purchase at Las Maria's Restaurant	\$68.71
November 25, 2022	Debit card purchase at Target	\$126.51
November 25, 2022	Debit card purchase at Hobby Lobby	\$47.09
November 28, 2022	ATM withdrawal	\$302.50
November 28, 2022	Debit card purchase at ATH	\$67.16
November 28, 2022	ATM withdrawal	\$63.50
November 28, 2022	ATM withdrawal	\$202.50
November 28, 2022	Debit card purchase at Thorntons	\$13.30
November 28, 2022	Debit card purchase at Speedway	\$4.20
November 28, 2022	Debit card purchase at Circle K	\$13.48
November 28, 2022	ATM fee	\$1
November 28, 2022	ATM fee	\$1
November 28, 2022	ATM fee	\$1
November 28, 2022	Debit card purchase at Menards	\$48.82
November 28, 2022	Debit card purchase at Homegoods	\$25.05
November 29, 2022	Debit card purchase at Haymakers	\$40.22
November 29, 2022	ATM withdrawal	\$203
November 29, 2022	ATM fee	\$1
November 30, 2022	Debit card purchase at La Bamba	\$21.22
January 11, 2023	Cash withdrawal from deposit	\$60
January 13, 2023	ATM withdrawal at Buford's Pub, 109 E. Market Street, Sadorus, IL	\$203



January 13, 2023	ATM fee	\$1
January 27, 2023	ATM withdrawal at Pia's Sports Bar, 1609 W. Springfield Ave., Champaign, IL	\$203
January 27, 2023	ATM fee	\$1
January 31, 2023	Debit card purchase at Toast	\$20.07
February 9, 2023	Cash withdrawal from deposit	\$100
February 14, 2023	Debit card purchase as Hobby Lobby	\$71.31
February 14, 2023	Debit card purchase at Hobby Lobby	\$1.07
February 16, 2023	Debit card purchase at Circle K	\$20.08
March 15, 2023	ATM withdrawal at Pia's Sports Bar, 1609 W. Springfield, Champaign, IL	\$203
March 15, 2023	ATM fee	\$1
March 15, 2023	Debit card purchase at Auntie Lee's Chinese Kitchen	\$32.97
April 13, 2023	ATM withdrawal at Pia's Sports Bar, 1609 W. Springfield, Champaign, IL	\$63
April 13, 2023	ATM fee	\$1
April 13, 2023	ATM withdrawal at Pia's Sports Bar, 1609 W. Springfield Ave., Champaign, IL	\$43
April 13, 2023	ATM fee	\$1
April 14, 2023	ATM withdrawal at Busey Bank, 201 W. Main Street, Urbana, IL	\$103
April 14, 2023	ATM fee	\$1
April 17, 2023	ATM withdrawal at Game On Sports Tavern, 121 E. Market Street, Sadorus, IL	\$63
April 17, 2023	ATM fee	\$1

May 1, 2023	ATM withdrawal at Tumble Inn Tavern, 302 S. Neil Street, Champaign, IL	\$203
May 1, 2023	ATM fee	\$1
May 8, 2023	ATM withdrawal at Buford's Pub, 109 E. Market Street, Sadorus, IL	\$203
May 8, 2023	ATM fee	\$1
May 8, 2023	ATM withdrawal at Game On Sports Tavern, 121 E. Market Street, Sadorus, IL	\$203
May 8, 2023	ATM fee	\$1

**ANSWER:**

**Respondent admits to the allegations with the exception of the first transaction contained in Paragraph 12 of Count II of the Complaint, and further states that the first transaction was a teller withdraw of \$1,000 to place back into the Busey account to pad it for bills that were still coming out of the account until the account was closed in December.**

13. Respondent used the funds described in paragraph 12, above, for her own personal or business purposes without authority.

**ANSWER:**

**Respondent admits the allegations of Paragraph 13 of Count II of the Complaint, per the circumstances described in the response to Paragraph 12 above.**

14. At no time did the CCBA Board or anyone else authorize Respondent to use the funds described in paragraph 12, above, for her own personal or business purposes.

**ANSWER:**

**Respondent admits the allegations of Paragraph 14 of Count II of the Complaint, per the circumstances described in the response to Paragraph 12 above.**

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

- a. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation by conduct including knowingly using \$5,136.71 in funds belonging to the CCBA for her own personal or business purposes without authority, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

**ANSWER:**

**Respondent admits to such conduct as to \$4,136.71 in Paragraph 15 (a) of Count II of the Complaint.**

### COUNT III

*(Dishonesty - Making a False Statement to CCBA Board Members)*

16. The Administrator realleges and incorporates paragraphs 11 through 14, above.

**ANSWER:**

**Respondent realleges and incorporated her answers to Paragraph 11 through 14 above.**

17. While preparing the 2024 CCBA budget, Colleen Ramais, the CCBA treasurer, noticed several unauthorized cash withdrawals and purchases that were made with the IFB account debit card.

**ANSWER:**

**Respondent admits the allegations contained in Paragraph 17 of Count III of the Complaint.**

18. On or about January 23, 2024, Ms. Ramais and Brett Kepley, the CCBA vice-president, met with Respondent to investigate the unauthorized withdrawals and purchases that were made with the IFB account debit card. During the meeting, Respondent stated to Ms.

Ramais and Mr. Kepley that C.P., her spouse, had used the debit card and made the unauthorized cash withdrawals and purchases from the IFB account.

**ANSWER:**

**Respondent admits the allegation contained in the first sentence of Paragraph 18 of Count III of the Complaint. Respondent denies the allegation in the second sentence of Paragraph 18 of Count III of the Complaint, and further answering states that Respondent advised Ms. Ramais and Mr. Kepley that she needed to see if C.P. had used the card as Respondent had reason to believe C.P. had removed more of Respondent's funds from Respondent's own account at times when C.P. would use Respondent's card than Respondent had originally authorized her to take out.**

19. Respondent's statement to Ms. Ramais and Mr. Kepley that C.P., her spouse, had used the debit card and made the unauthorized cash withdrawals and purchases from the IFB account was false, because Respondent had used the debit card and made the unauthorized cash withdrawals and purchases from the IFB account.

**ANSWER:**

**Respondent admits the allegation contained in Paragraph 19 of Count III of the Complaint, and further answering states that Respondent had no idea the statement was false at the time that Respondent said this to Ms. Ramais and Mr. Kepley.**

20. At the time Respondent made the statement to Ms. Ramais and Mr. Kepley described in paragraph 18, above, she knew the statement was false.

**ANSWER:**

**Respondent denies the allegation contained in Paragraph 20 of Count III of the Complaint.**

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

- a. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation by conduct including making the false statement to Ms. Ramais and Mr. Kepley described in paragraph 18, above, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

**ANSWER:**

**Respondent denies the allegation contained in Paragraph 21 (a) of Count III of the Complaint.**

**WHEREFORE,** Respondent requests that the Hearing Board impose other relief that may be deemed just.

Respectfully submitted,

(s) Samuel J. Manella  
SAMUEL J. MANELLA  
Attorney for Respondent

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