

IN THE SUPREME COURT OF ILLINOIS

In the matter of:	)	
	)	
RHONDA CRAWFORD,	)	Supreme Court No. M.R. 28341
	)	
Attorney-Respondent.	)	Commission No. 2016PR00115
	)	
No. 6281226.	)	
	)	

**RESPONDENT RHONDA CRAWFORD’S MOTION FOR EXTENSION OF TIME  
TO RESPOND TO ADMINISTRATOR’S PETITION FOR INTERIM SUSPENSION  
PURSUANT TO SUPREME COURT RULE 774(a)(2)  
OR FOR DENIAL OF INTERIM SUSPENSION**

Now comes Respondent, Rhonda Crawford, by her attorney, Mary Robinson, Robinson Law Group, LLC, and respectfully requests that this Honorable Court grant her an extension of 14 days, to and including November 11, 2016, to file her response to the Administrator’s Petition for Interim Suspension or that the Court enter an order directing that Respondent not be authorized to assume judicial office until further order while denying the Administrator’s request for an interim suspension of Respondent’s license.

In support thereof, Respondent alleges:

1. On October 7, 2016, the Administrator filed before the Hearing Board of the ARDC a Complaint alleging that on August 11, 2016, Respondent, at the time a candidate for judicial office and not a sworn judge, engaged in misconduct by accepting a robe from Circuit Judge Valarie Turner, sitting in the Judge’s chair, failing to correct statements by others referring to Respondent as a judge, and purporting to enter orders in three traffic matters,

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28341

10/27/2016

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under the direction of Judge Turner. The Administrator alleges that Respondent's conduct violated criminal statutes (official misconduct and false impersonation), and further alleges that statements which Respondent made at her ARDC sworn statement that no one was misled to believe that she was a judge and that it would have been clear that Judge Turner was trying to teach her were false.

2. The Complaint was served on October 13, 2016, and Respondent's answer is first due to be filed on November 3, 2016.

3. Also on October 13, 2016, the Administrator filed with this Court a Petition for Interim Suspension pursuant to Supreme Court Rule 774(a)(2), alleging that in light of her conduct and her refusal to remove herself from the ballot, Respondent has exhibited a "failure to understand the importance of the judicial oath and the gravity of her conduct," and a "fundamental lack of eligibility to maintain a license to practice law," so that her continued ability to practice law poses a threat of irreparable injury to the public, the legal profession and the orderly administration of justice.

4. Respondent was served with the Petition on October 13, 2016. The following day, her primary counsel, George Collins, passed.

5. On October 21, 2016, this Court issued an order directing that Respondent file a response to the Administrator's Petition on or before October 28, 2016. Respondent sought to retain counsel to replace Mr. Collins, and she retained the undersigned on October 25, 2016, to serve as co-counsel with Mr. Collins' partner, Adrian Vuckovich.

6. Respondent and her counsel are well aware of the public scrutiny which is focused upon this matter, and appreciate that there is significant pressure to resolve whether action will be taken to impact Respondent's candidacy before the November 8, 2016 election.

7. Nevertheless, in the Petition at hand, the Administrator has not sought, and does not purport to have grounds for seeking, disqualification of Respondent as a candidate for office or removal of Respondent from the ballot.

8. Instead, the Administrator seeks suspension of Respondent's license to practice law and/or entry of an order restraining Respondent from assuming judicial office should she be elected.

9. As a result, it is not necessary for this Court to rule upon the Administrator's Petition before the election in order for the relief requested in the Petition to be effective.

10. To address concerns of adverse impact upon the public's perception of the dignity and integrity of the judiciary, Respondent agrees to not oppose entry of an order that would delay her from assuming office as a circuit court judge until the disciplinary case has been resolved.

11. Respondent does, however, ask for the ability to appropriately address the issue of whether the Administrator has presented grounds sufficient to warrant that Respondent be stripped of her law license without a hearing.

12. It is fundamental constitutional doctrine that one who has been granted benefits or a license is entitled to due process, including notice of the charges and an opportunity to be heard in defense, before a governmental entity can remove the license. *Mathews v Eldridge*, 424 U.S. 319 (1976); *In re Ruffalo*, 390 U.S. 544, 550 (1968). Respondent

admits that she engaged in the conduct of donning the robe, sitting at the bench, and making notations on tickets in three cases, and that her conduct was a regrettable lapse in judgment.

13. However, Respondent denies that she acted in an official capacity so as to invoke the official misconduct statute, she denies that she acted with any criminal intent, and she denies that she made false statements or otherwise intended to mislead.

14. Respondent is entitled to a hearing at which evidence will be presented in an orderly fashion and three members of a properly appointed Hearing Panel will assess not only the facts of what happened, but the full context (which, to date, continues to include no input from Judge Turner), including Respondent's understandings and motives, which will have a significant impact upon any sanction recommendation. As this Court has observed, "To warrant either disbarment or suspension, the record must be free not only from doubt as to the act charged but also as to the motive with which it was done." *In re Brumund*, 381 Ill. 139, 144 (1942), citing *In re Smith*, 365 Ill. 11, 5 N.E.2d 227; *In re Lasecki*, 358 Ill. 69, 192 N.E. 655; *People ex rel. Chicago Bar Ass'n v. Hammond*, 356 Ill. 581, 191 N.E. 215; *People ex rel. Chicago Bar Ass'n v. Lotterman*, 353 Ill. 399, 187 N.E. 424. *See also*, *In re Pilota*, M.R. 19752, 02 CH 115 (January 14, 2005) and *In re Howard*, M.R. 15103 (September 28, 1998), where this Court approved Hearing and Review Board determinations that episodes of flawed judgment did not warrant discipline.

15. There is no precedent in this state for an interim suspension being ordered based upon conduct akin to that involved here. Interim suspension is typically reserved for cases where a lawyer has been convicted of a crime involving fraud or public corruption or where a lawyer has converted large sums of money belonging to clients or others, where it

is reasonably apparent that not only will the conduct be proved once process is afforded, but also that, once proved, the conduct will result in a lengthy suspension or disbarment.

16. The Administrator has cited no authority suggesting that a lengthy suspension would be warranted based upon the conduct at issue here, even if proved to be all that the Administrator has alleged, and counsel is aware of no such precedent.

17. The goal of addressing whether Respondent will be able to assume judicial office if successful in the election is fully met by Respondent's concession to entry of an order directing that she will not be allowed to assume office until further order of the court.

18. An interim suspension precluding Respondent from gainful employment in the practice of law for an extended period of time, likely beyond any suspension that might be imposed after appropriate proceedings, is not needed to accomplish that end.

19. Particularly in light of the unfortunate circumstance of the death of Respondent's counsel, fairness dictates that interim suspension not be considered until Respondent is given sufficient time to allow her newly retained counsel to become acquainted with the circumstances of this case and to prepare a full response addressing the significant constitutional considerations and disciplinary precedent relevant to the issue of whether an interim suspension should be imposed.

WHEREFORE, Respondent respectfully requests that this Court grant her an extension of time of 14 days, to and including November 11, 2016, to respond to the Administrator's Petition, or that the Court determine to deny the request for an interim suspension because an order restraining Respondent from assuming judicial office until further order of the Court will accomplish the goals argued by the Administrator.

Respectfully submitted,

/s/ Mary Robinson\_\_\_\_\_

Mary Robinson  
One of Respondent's Counsel

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NOTICE OF FILING

TO: Wendy J. Muchman  
 Shelley M. Bethune  
 Counsel for the Administrator  
 130 East Randolph Drive, Suite 1500  
 Chicago, IL 60601

PLEASE TAKE NOTICE that on October 27, 2016, I filed the attached Respondent Rhonda Crawford’s Motion for Extension of Time to Respond to Administrator’s Petition for Interim Suspension Pursuant to Supreme Court Rule 774(a)(2) or for Denial of Interim Suspension with the Clerk of the Attorney Registration and Disciplinary Commission in Chicago, Illinois, a copy of which is hereby served upon you.

/s/ Mary Robinson  
 Mary Robinson

**PROOF OF SERVICE**

The undersigned attorney hereby certifies that she served the above Notice of Filing and Respondent Rhonda Crawford’s Motion for Extension of Time to Respond to Administrator’s Petition for Interim Suspension Pursuant to Supreme Court Rule 774(a)(2) or for Denial of Interim Suspension on the persons and address listed above by causing it to be deposited in the United States Mail at 20 S. Clark St., Chicago, IL 60603 before 5:00 p.m. this 27th day of October, 2016.

/s/ Mary Robinson  
 Mary Robinson

Mary Robinson  
 Robinson Law Group, LLC  
 20 South Clark Street, Suite 1060  
 Chicago, IL 60603  
 (312) 676-9874  
[mrobinson@robinsonlawillinois.com](mailto:mrobinson@robinsonlawillinois.com)

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**DRAFT ORDER**

Respondent Rhonda Crawford’s Motion for Extension of Time to Respond to Administrator’s Petition for Interim Suspension Pursuant to Supreme Court Rule 774(a)(2) or for Denial of Interim Suspension is ALLOWED/DENIED.

Date: \_\_\_\_\_

\_\_\_\_\_

Justice