In re James Thomas Rollins
Respondent-Appellee

Commission No. 2021PR00054

Synopsis of Review Board Report and Recommendation
(March 2023)

The Administrator brought a one-count complaint against Respondent, charging him with engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct. The complaint alleged that Respondent acted dishonestly by creating fake documents that he submitted to his law firm, falsely representing he had paid business expenses that he had not paid, in an attempt to defraud the law firm of $63,000.

The Hearing Board found that Respondent had committed the charged misconduct and recommended that Respondent be suspended for five months.

The Administrator appealed, challenging the Hearing Board's sanction recommendation and asking the Review Board to recommend a one-year suspension instead. Respondent cross-appealed, also challenging the Hearing Board's sanction recommendation, and asking this Board to recommend a censure or a suspension of no more than 60 days.

The Review Board agreed with the Hearing Board's recommendation that Respondent be suspended for five months.

FILED

March 29, 2023

ARDC CLERK

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

In the Matter of:

JAMES THOMAS ROLLINS,

Respondent-Appellee,

No. 6291928.

Commission No. 2021PR00054

REPORT AND RECOMMENDATION OF THE REVIEW BOARD

SUMMARY

The Administrator brought a one-count complaint against Respondent, charging him with engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct. The complaint alleged that Respondent acted dishonestly by creating fake documents, including invoices, a bank statement, and checks, which he submitted to his law firm, falsely representing that he had paid business expenses totaling $81,000, as payment towards the $100,000 capital contribution he owed to his law firm, even though he had paid only $18,000 for expenses, thereby attempting to defraud the law firm of $63,000. Respondent admitted that he engaged in the charged misconduct.

Following a disciplinary hearing on February 24, 2022, at which Respondent was represented by counsel, the Hearing Board found that Respondent committed the charged misconduct and recommended that Respondent be suspended for five months. The Hearing Board's Report was filed on August 11, 2022.

At the disciplinary hearing, the Administrator offered 11 exhibits, which were admitted into evidence. The Administrator called Respondent as an adverse witness, and also

presented the testimony of Respondent's former law firm partner, Douglas Sinars. Respondent testified on his own behalf and called two character witnesses. Respondent did not offer any exhibits.

The Administrator appealed, challenging the Hearing Board's sanction recommendation, and asking this Board to recommend a one-year suspension instead of a five-month suspension. Respondent cross-appealed, also challenging the Hearing Board's sanction recommendation, and asking this Board to recommend a censure or a suspension of no more than 60 days. The only issue on appeal is the sanction. Neither party challenges the Hearing Board's findings. The Review Board heard oral arguments on January 13, 2023.

For the reasons that follow, we agree with the Hearing Board's recommendation that Respondent be suspended for five months.

BACKGROUND

Respondent

Respondent graduated from law school in 2003 and worked in the insurance industry for several years handling asbestos claims. He was admitted to practice law in Illinois in 2007, and he worked at a law firm from 2007 to 2016, focusing on asbestos litigation defense. From 2016 to 2019, Respondent was a partner in a law firm that he established with three other attorneys, which primarily handled asbestos litigation defense. At the time of the disciplinary hearing, Respondent was working for another law firm, where he did commercial litigation. He has no prior discipline.

Respondent's Misconduct

The facts as found by the Hearing Board are fully set out in the Hearing Board's report. Because the only issue on appeal is the appropriate sanction for Respondent's misconduct, the facts are summarized only briefly here.

In March 2016, Respondent and three other attorneys opened a law firm together. Respondent agreed that he would contribute $100,000 in capital, in exchange for an ownership interest in the firm. Respondent's capital contribution was to be in the form of cash, or the payment of firm-related start-up expenses that would be credited to his capital contribution.

Respondent, however, did not have sufficient funds to pay the full $100,000. He did not communicate that to his new partners. Instead, in early 2017, Respondent falsely represented to one of his partners that he had paid firm-related start-up expenses, which should be credited to his capital contribution, and that he was going to submit receipts to the law firm for those expenses.

Shortly thereafter, Respondent submitted to the law firm three fake invoices for start-up expenses that Respondent purportedly paid on behalf of the law firm. Respondent asked that his payment of those expenses be credited to his capital contribution. The fake invoices were for legal services from another law firm; computer services from a technology company; and computer equipment from a computer store. (Adm. Exs. 1, 4, 7.) After Respondent submitted those invoices, the firm's bookkeeper concluded that the invoices did not appear to be authentic.

In May 2017, one of Respondent's partners, Douglas Sinars, approached Respondent and asked him about the invoices. In response, Respondent falsely represented that he had receipts, checks, and bank statements for the expenses he had paid on behalf of the law firm, and he would provide them to Sinars.

Respondent gave Sinars two phony personal checks to make it falsely appear that he had paid the invoices from the other law firm and the technology company, as he had previously indicated. (Adm. Exs. 10-11.) Respondent also provided a fictitious bank statement, purportedly from his personal bank account, showing an additional payment, which Respondent falsely represented was another start-up expense that he had paid for the law firm, relating to computer servers. (Adm. Ex. 9.)

In August 2017, Respondent was confronted about the false documents by his partner, Douglas Sinars, and two other partners. Initially, Respondent denied everything. His partners then explained that they had evidence showing the documents he had submitted were false. At that point, Respondent admitted what he had done and apologized.

After discovering the misconduct, Respondent's partners allowed him to stay at the firm, but it was agreed that his ownership interest in the law firm would be reduced because Respondent had not paid the full capital contribution. Respondent agreed to pay the capital contribution over a period of time, which he did. In April 2019, Respondent was fired for various reasons.

HEARING BOARD'S FINDINGS, AND RECOMMENDATION

Misconduct Findings

The Hearing Board found that Respondent violated Rule 8.4(c), which prohibits attorneys from engaging in "conduct involving dishonesty, fraud, deceit, or misrepresentation." The Hearing Board found that Respondent acted dishonestly by submitting false documents, and attempting to conceal his misconduct by submitting phony personal checks as support for two of the fake invoices. (Hearing Bd. Report at 4-5.) Respondent admitted his misconduct. (Tr. 63-66.)

Mitigation and Aggravation Findings

In mitigation, the Hearing Board found that Respondent accepted responsibility, acknowledged that his misconduct was very serious, and expressed genuine remorse; Respondent had an unblemished 10-year career; he participated in community service activities and provided *pro bono* legal services; he was active in professional organizations; he was a volunteer youth basketball coach; he was a member of the Red Cross Disaster Action Team; and he cooperated in his disciplinary proceedings. He also presented favorable character testimony from two witnesses, who testified that Respondent had an excellent reputation for honesty and integrity. (Hearing Bd. Report at 5-6.)

In aggravation, the Hearing Board found Respondent's misconduct involved the fabrication of multiple false documents over a period of time, and Respondent attempted to conceal his misconduct by creating additional false documents. Additionally, Respondent's actions jeopardized the new law firm, which was still trying to build its reputation, and his actions created uncertainty for the law firm. (*Id*. at 7.)

Sanction Recommendation

The Hearing Board recommended Respondent be suspended for five months. (*Id*. at 8.)

SANCTION RECOMMENDATION

The Administrator and Respondent both challenge the sanction recommendation, with the Administrator arguing for a one-year suspension and Respondent arguing for a censure or a suspension of no more than 60 days

We review the Hearing Board's sanction recommendations *de novo*. *See In re Storment*, 2018PR00032 (Review Bd., Jan. 23, 2020) at 15, *petition for leave to file exceptions*

denied, M.R. 30336 (May 18, 2020). In making our recommendation, we consider the nature of the proved misconduct, and any aggravating and mitigating circumstances shown by the evidence, *see In re Gorecki*, 208 Ill. 2d 350, 360-61, 802 N.E.2d 1194 (2003), while keeping in mind that the purpose of discipline is not to punish but rather to protect the public, maintain the integrity of the legal profession, and protect the administration of justice from reproach. *See In re Timpone*, 157 Ill. 2d 178, 197, 623 N.E.2d 300 (1993). We also consider the deterrent value of attorney discipline and whether the sanction will help preserve public confidence in the legal profession. *See Gorecki*, 208 Ill. 2d at 361. We also seek to recommend a sanction that is consistent with sanctions imposed in similar cases, *see Timpone*, 157 Ill. 2d at 197, while considering the unique facts of each case. *See In re Witt*, 145 Ill. 2d 380, 398, 583 N.E.2d 526 (1991). Although our review is *de novo*, the Hearing Board's findings regarding candor, intent, understanding of the misconduct, and other fact-finding judgments are ordinarily entitled to considerable weight because the Hearing Board is able to observe the witnesses' demeanor and judge their credibility. *See In re Timpone*, 157 Ill. 2d at 196; *In re Martinez-Fraticelli*, 221 Ill. 2d 255, 280, 850 N.E.2d 155 (2006).

The Administrator argues that a five-month suspension is not sufficient under the facts of this case because it does not adequately address the serious nature of Respondent's dishonest conduct, and asserts the appropriate sanction is a one-year suspension. Respondent, on the other hand, argues that the Hearing Board's recommendation of a five-month suspension is too harsh, and asserts that the appropriate sanction is a censure or a minimal suspension. We conclude that the Hearing Board's recommendation of a five-month suspension is appropriate and fair.

A Five-Month Suspension Properly Addresses the Misconduct and Aggravating Factors

The Administrator argues that Respondent's misconduct and the aggravating factors are very serious, and we agree. Respondent actively sought to defraud his partners

concerning his capital contribution by submitting fake invoices. He lied when he was confronted in May 2017 and then created additional phony documents. He lied again when he was confronted in August 2017. Respondent intentionally tried to cheat his new law firm out of $63,000, and would have succeeded, if he had not been caught. That conduct is inexcusable.

Attorneys absolutely cannot defraud, or attempt to defraud, their law firms, and doing so undermines the integrity of the legal profession, and damages the public's confidence in attorneys. Cheating a law firm, like cheating a client, constitutes egregious misconduct.

We also agree with the Administrator that the aggravating factors in this case are serious, including Respondent's attempt to conceal his misconduct. When Respondent's partner, Douglas Sinars, first questioned Respondent about the fake invoices in May 2017, Respondent falsely denied any wrongdoing. Respondent then fraudulently created two phony checks and a fictitious bank statement in order to mislead the law firm, conceal his wrongdoing, and continue the fraud.

When Respondent was subsequently confronted by three of his partners in August 2017, Respondent initially denied any wrongdoing and acted offended that he was being accused of misconduct. Although Respondent did eventually admit to his wrongdoing, he did so only after his partners explained they had evidence that the documents he had submitted were fake. Respondent did not voluntarily stop his wrongdoing, or admit what he had done, until he realized that he had been caught.

An additional aggravating factor is the harm Respondent's misconduct caused to the law firm. His wrongdoing placed the firm in significant jeopardy because the firm could have lost clients, and could have even been forced to close, as a result of the damage to its reputation. That, in turn, placed the firm's clients at risk. The firm was particularly vulnerable because it was

new. His misconduct also created substantial stress for people at the law firm – many of whom had left other more secure positions to work at the new firm – because they were concerned that the firm might close. His misconduct also resulted in an audit by one of the firm's clients, which involved time and expense for the firm. Moreover, Respondent severely breached his partners' trust. Indeed, Respondent's partner, Douglas Sinars, testified that he felt betrayed by Respondent. (Tr. 44.)

While Respondent's misconduct was very serious, we believe that – in light of the mitigation in this case – a five-month suspension properly addresses the serious nature of the misconduct. Although the Administrator contends Respondent should receive a one-year suspension, we do not believe a suspension of that length is warranted.

A Five-Month Suspension Appropriately Balances the Misconduct and The Mitigation

Respondent contends that he should receive nothing more than a censure or a minimal suspension. Although we agree with Respondent that there is significant mitigation in this case, we believe that the recommended five-month sanction adequately balances the mitigation against the serious nature of the misconduct and the aggravating factors. Therefore, we believe that the sanction in this case should not be less than a five-month suspension.

In terms of mitigation, Respondent acknowledged his misconduct, accepted responsibility, and expressed genuine remorse. The Hearing Board stated: "[W]e found his regret to be deep and genuine. We also found Respondent's testimony to be forthright and candid, and note that he did not make excuses for his actions but rather accepted full responsibility for them. We find that Respondent fully understands the wrongfulness of his conduct." (Hearing Bd. Report at 8.)

Although we consider the sanction *de novo*, we give the Hearing Board's findings on this issue substantial weight since the Hearing Board had the benefit of seeing Respondent's testimony in person and observing the two individuals who provided testimony concerning Respondent's good character. *See In re Capozzoli*, 2000PR00037 (Review Bd., Aug. 9, 2002) at 11, *petitions for leave to file exceptions allowed*, M.R. 18371 (Jan. 2, 2003) ("[T]he Hearing Board's conclusions as to the level of a respondent's credibility, remorse, understanding of his or her misconduct, and other similar matters do deserve deference, as these are factual matters.").

Additional mitigation in this case includes the following:

- Respondent has no prior discipline. Respondent had an unblemished 10-year career in the legal profession before his misconduct in 2017.
- Respondent fully cooperated during the disciplinary process, and consistently admitted his wrongdoing. He apologized to the ARDC and to his former partners. (Tr. 84.)
- Although it took 18 months, Respondent paid the full amount of money he owed the law firm for his capital contribution, and he paid that money before this disciplinary matter was brought against him.
- After his initial denials, Respondent admitted his wrongdoing to his partners, which saved the law firm additional time and effort, and Respondent agreed to having his ownership interest in the law firm reduced.
- The misconduct took place over a period of less than eight months. Respondent testified he was under stress at that time because he had two small infants and he was struggling to save his marriage. (Tr. 84-85.)
- Respondent was active in the community for years. He volunteered for the American Red Cross and was a member of the Disaster Action Team for seven years; he provided *pro bono* services; and he coached children's sports teams. He was also a member of the Chicago Bar Association and the Illinois State Bar Association, where he participated on committees.
- Respondent presented favorable character testimony from two attorneys, Ken Sullivan and Brian Hecht, who testified concerning Respondent's good character. Sullivan, who had

> known Respondent for more than 10 years, hired Respondent to work in his law firm in 2021. Sullivan testified that he trusts Respondent implicitly; Respondent is an excellent attorney; and Respondent has an excellent reputation for truth and veracity in the legal community. (Tr. 114-18.) Hecht, who had known Respondent for 25 years, testified that he holds Respondent in high regard; Respondent is a great attorney; he is very trustworthy; he has the highest moral character; and he is extremely remorseful for his actions. (Tr. 105-07.)

Respondent also contends that a lower sanction is warranted because his misconduct did not result in a financial loss to the law firm, and he did not receive any money as a result of his misconduct. That argument has no merit. The law firm avoided losing money because Respondent was caught. The fact that there was no financial loss was not for lack of Respondent's trying to cheat the law firm. Respondent intended, planned, and attempted to cheat the law firm out of $63,000, and he would have done so, if his fraud had not been discovered. The absence of a loss did not result from any positive or curative action by Respondent. We reject that argument.

Accordingly, we believe a five-month suspension is appropriate based on the serious nature of Respondent's misconduct, balanced against the mitigating factors in this case.

Relevant Precedent Supports a Five-Month Suspension

We believe that a five-month suspension is consistent with sanctions imposed in similar cases, as discussed below. We also believe that the cases cited by the Administrator and Respondent are distinguishable.

Cases cited by the Administrator: The Administrator cites three cases in which attorneys were suspended for one year for submitting false documents to their law firms in order to obtain payment for expenses they did not actually incur. We believe those cases involve more serious conduct than this case. *See In re Smolen*, 2013PR00060 (Hearing Bd., Jan. 7, 2015), *approved and confirmed*, M.R. 27199 (March 12, 2015) (the attorney submitted 800 false receipts,

over a four-year period, for cab rides he did not take, and he received $69,800 in reimbursement from his firm based on those false receipts; he also received $379,000 in unsupported expenses, which he repaid as restitution); *In re Solomon*, 1992PR00159 (Hearing Bd., Feb. 26, 1993), *approved and confirmed*, M.R. 9073 (May 21, 1999) (the attorney double-billed his employer by fraudulently requesting reimbursement for 154 items that had previously been paid; he submitted false expense requests approximately 19 or 20 times a year over an eight-year period, totaling $21,000); *In re Alpert*, 2001PR00013, *petition for discipline on consent allowed*, M.R. 17749 (Nov. 28, 2001) (the attorney submitted false expense vouchers to his law firm on numerous occasions over a two-year period, totaling $35,000, in relation to his representation of two separate clients, and caused payments from those two clients to be falsely credited to the wrong accounts to conceal his misconduct; he also made false statements about certain expenses when he was questioned by another partner at the law firm).

Although we agree with the Administrator that the misconduct in those cases is somewhat similar to the misconduct here, those attorneys repeatedly submitted a massive number of false expense vouchers, again and again, over a period of years. That misconduct was substantially more serious than Respondent's misconduct in this case, so that a lesser sanction is appropriate here.

Cases cited by Respondent: Respondent cites six cases that resulted in sanctions ranging from a censure to a 60-day suspension where attorneys engaged in dishonest conduct. We believe those cases involve less serious conduct than this case. *See In re Gerstetter*, 2021PR00050, *petition to impose discipline on consent allowed*, M.R. 030922 (Oct. 14, 2021) (the attorney, who was 28 years old and had been an attorney for only two years, was suspended for 60 days for submitting false billing records over a three month period for 86 hours of legal services that she

did not provide, totaling approximately $40,000; in mitigation, she expressed regret; she engaged in charitable and community activities and substantial *pro bono* work; she cooperated; and had no prior discipline); *In re Friedman*, 2018PR00101, *petition to impose discipline on consent allowed*, M.R. 030145 (Jan. 17, 2020) (the attorney, who was 73 years old and had no prior discipline, was censured for negotiating a $40,000 settlement with an insurance company without disclosing that his client had died; he also directed the deceased's grandson to sign the client's name to a release form; the attorney eventually disclosed to the insurance company that his client had died, and the parties reached a $40,000 settlement on behalf of the deceased client's estate); *In re Carter*, 2018PR00055, *petition to impose discipline on consent allowed*, M.R. 029591 (Jan. 29, 2019) (the attorney, who had an unblemished 40-year legal career, was censured for failing to serve the opposing party, which resulted in the dismissal of the case; he also falsely represented to his clients that the case was still pending); *In re Goldman*, 2018PR00016, *petition to impose discipline on consent allowed*, M.R. 029358 (Sept. 20, 2018) (the attorney was censured for falsely representing to his client that he had settled the client's case against an auto repair shop and had obtained a $600 settlement; the attorney used his own funds to pay the client $600); *In re Knowles*, 2015PR00073 (Review Bd., April 5, 2017), *petition for leave to file exceptions allowed*, M.R. 028744 (Oct. 13, 2017) (the attorney was suspended for 30 days for converting $4,000 that belonged to clients by taking portions of retainers that she had not earned; she had expected to earn the retainers, and she restored the funds); *In re Kathe*, 2014PR00089, *petition to impose discipline on consent allowed*, M.R. 27192 (April 2, 2015) (the attorney was suspended for 60 days for neglecting a collection matter and a probate matter, which resulted in both matters being dismissed; he made a series of misrepresentations to conceal his lack of diligence; the harm to the clients was

minimal because the collection matter was refiled, and the clients decided not to pursue the probate matter; the attorney expressed remorse and had an unblemished 14-year legal career).

Respondent's intentional fraud here was more complex, and involved significantly more money, than the misconduct in those cases. Respondent's wrongdoing also caused substantially more harm. We believe Respondent's misconduct in this case was more serious and, therefore, a more serious sanction is appropriate here.

Cases cited by the Hearing Board: In support of its recommendation, the Hearing Board cited five cases, discussed below, in which the attorneys were suspended for five months. We agree with the Hearing Board that those cases, which resulted in five-month suspensions, provide guidance concerning an appropriate sanction in this matter. *See In re Loprieno*, 2016PR00082, (Review Bd., April 27, 2018), *approved and confirmed*, M.R. 029397 (Oct. 11, 2018); *In re Hilliard*, 2004PR00058, *petition to impose discipline on consent allowed*, M.R. 19967 (April 8, 2005); *In re Michod*, 1997PR00099 (Review Bd., Nov. 29, 2000), *petitions for leave to file exceptions denied*, M.R. 17317 (March 22, 2001); *In re Morse*, 1999PR00082, *petition to impose discipline on consent allowed*, M.R. 17319 (March 22, 2001); *In re Magar*, 1999PR00079, *petition to impose discipline on consent allowed*, M.R. 16581 (April 21, 2000).

In *Loprieno*, the attorney created a fake document in order to obtain a $25,000 loan. In doing so, he falsified the signature of certain bank officials and falsely notarized those signatures. A year and a half later, he created a similar fake document, which he falsely signed and notarized. He filed both documents with the clerk of the court. He subsequently repaid the loan. In mitigation, he accepted responsibility, and he had performed *pro bono* work.

In *Hilliard*, the attorney received a $15,000 retainer fee that he should have remitted to his law firm. Hilliard used that money for his own personal purposes, without authority,

including to pay a gambling debt. He also falsely represented to his law firm that the client had not paid the retainer. When the law firm discovered his misconduct, Hilliard admitted his misconduct, immediately repaid the money, and resigned his partnership. His misconduct was related to his gambling, and Hilliard obtained treatment for his gambling problems. Hilliard accepted responsibility, cooperated with the disciplinary proceedings, and had no prior discipline.

In *Michod*, the attorney misappropriated $62,500 from his law firm. A client paid the law firm a fee of $112,500, which Michod deposited into an account that he controlled. Michod unilaterally decided that $62,500 was an appropriate payment for legal work he had done, and he took that amount for his own benefit, without the knowledge of the law firm. The Review Board found that the mitigating evidence presented was particularly strong. Michod had a long record of providing *pro bono* services, engaging in volunteer work, and providing community service. His misconduct was an aberration; he was under significant stress due to his wife's serious illness; and he made restitution promptly. He presented very favorable character evidence from judges and lawyers, who testified that Michod had an excellent reputation for honesty and integrity.

In *Morse*, the attorney misappropriated $34,000 from his law firm, which was a referral fee and reimbursement of expenses from another law firm. In order to personally obtain that money, Morse created a fictitious release form, which he sent to the other law firm. In terms of mitigation, he expressed remorse; made restitution; cooperated with the disciplinary proceeding; was active in bar associations; was involved in fundraising activities for non-profit groups; provided *pro bono* services; and he had no prior discipline.

In *Magar*, the attorney created and used two false leases to obtain a loan, and signed another person’s name to the leases, without authority. She also made false statements on a loan application, falsely inflating her rental income and falsely stating that she was not delinquent on

any mortgage. She received a home equity loan of $135,000, which she repaid six months later. In terms of mitigation, Magar acknowledged her misconduct; was remorseful; self-reported her misconduct to the ARDC; cooperated in the disciplinary proceeding; and had no prior discipline.

We agree with the Hearing Board that those cases are comparable to this one, although none of the cases are identical to the instant matter. In those cases, as in this one, the attorneys created false documents and made false representations in order to dishonestly obtain funds to which they were not entitled. We see no reason to depart from the Hearing Board's recommendation of a five-month suspension, which is fully supported by authority.

Our recommendation: Accordingly, we recommend that Respondent be suspended for five months. We believe that the recommended sanction serves the goals of attorney discipline by acting as a deterrent to other attorneys and helping to preserve public confidence in the legal profession. *See Gorecki,* 208 Ill. 2d at 360-61. We find that the recommended sanction is commensurate with Respondent's misconduct and consistent with discipline that has been imposed for comparable misconduct, without being so harsh that it constitutes punishment.

CONCLUSION

For the foregoing reasons, we agree with the Hearing Board's recommendation that Respondent be suspended for five months.

Respectfully submitted,

R. Michael Henderson
Michael T. Reagan
Scott J. Szala

CERTIFICATION

I, Michelle M. Thome, Clerk of the Attorney Registration and Disciplinary Commission of the Supreme Court of Illinois and keeper of the records, hereby certifies that the foregoing is a true copy of the Report and Recommendation of the Review Board, approved by each Panel member, entered in the above entitled cause of record filed in my office on March 29, 2023.

/s/ Michelle M. Thome
Michelle M. Thome, Clerk of the
Attorney Registration and Disciplinary
Commission of the Supreme Court of Illinois

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

In the Matter of: **JAMES THOMAS ROLLINS,** Respondent-Appellee, No. 6291928.	Commission No. 2021PR00054

PROOF OF SERVICE
OF THE REPORT AND RECOMMENDATION
OF THE REVIEW BOARD

I, Andrea L. Watson, hereby certify that I served a copy of the Report and Recommendation of the Review Board on the parties listed at the addresses shown below by e-mail and regular mail, by depositing it with proper postage prepaid, by causing the same to be deposited in the U.S. Mailbox at One Prudential Plaza, 130 East Randolph Drive, Chicago, Illinois 60601 on March 29, 2023, at or before 5:00 p.m. At the same time, a copy was sent to Counsel for the Administrator-Appellant by e-mail service.

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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 she verily believes the same to be true.

Michelle M. Thome,
Clerk

/s/ Andrea L. Watson
By: Andrea L. Watson
Deputy Clerk

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FILED

March 29, 2023

ARDC CLERK