

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

In the Matter of:

DANIEL LAWRENCE PETERS,

Attorney-Respondent,

No. 6205813.

Commission No. 2023PR00023

FILED –

COMPLAINT

Jerome Larkin, Administrator of the Attorney Registration and Disciplinary Commission, by his attorney, Christine P. Anderson, pursuant to Supreme Court Rules 753 and 761, complains of Respondent, Daniel Lawrence Peters, who was licensed to practice law in the State of Illinois on May 9, 1991 and alleges that Respondent has engaged in the following conduct which subjects Respondent to discipline pursuant to Supreme Court Rule 770:

COUNT I

(Respondent's no contest plea to soliciting a prostitute)

1. In March 2022, the sheriff's office in Polk County, Florida, conducted a six-day undercover prostitution and human trafficking campaign called "Operation March Sadness 2."
2. On March 10, 2022, Respondent, while residing at his second home in Kissimmee, Florida, searched the internet for erotic massages and answered at least one such advertisement.
3. In his text messages in response to one such advertisement, Respondent used lingo such as "roses," meaning money or amount, "Gfe," meaning girlfriend experience with sex, and "Bbbj," meaning bareback blowjob or oral sex without a condom. There was also a discussion in the text messages about pricing, in which Respondent understood that he would pay \$100 for one hour of sex with a condom and an extra \$50 if he wanted oral sex without a condom.

FILED
5/9/2023 12:10 PM
ARDC Clerk

4. On March 10, 2022, between 1:13 pm and 8:47 pm, Respondent exchanged 55 text messages in response to the advertisement offering erotic massages. Respondent identified himself as “Dan” and the person who responded to Respondent’s text messages identified themselves as “Ash.” Those text messages read, in part, as follows:

Respondent: Hey Ash, I’m in Kissimmee on 192. Where are you?
Ash: 4 corners
Respondent: Hotel?
Ash: house
Respondent: Roses?
Ash: how long
Respondent: Half or full
Ash: 50/100
Respondent: Gfe
Ash: yeah

5. On March 11, 2022, between 12:26 pm and 6:37 pm, Respondent exchanged 59 text messages with Ash. Those text messages read, in part, as follows:

Respondent: Hey sunshine
Ash: Hey
Respondent: Def seeing you today
Ash: Ok
Respondent: How was your night?
Ash: It was good
Respondent: I think we are only about 5 to 10 minutes away from each other. You could always come here if you want a change of scenery
Ash: Where r you
Ash: I feel safer at my place tbh
Respondent: No problem. What’s the address?
Ash: I eont be free until latr bby
Respondent: I’m at 8620 primrose. Later is good.
Ash: Still want gfe bby
Respondent: Absolutely
Ash: Ok baby
Respondent: What time works for you today princess?
Ash: 7 ok bby?
Respondent: Sure hunny. I’m golfing so I’ll run home and shower quick before I stop by. Address?
Ash: ok bby I’m in legacy park if that helps
Respondent: Off of Hwy 27?
Ash: I think so im not from here

Respondent: Doesn't help. Sorry
Ash: i can give you an address close to me if that help
Respondent: Great
Ash: ok bby
Ash: let me know when you done
Respondent: Done?
Ash: you said your golfing
Respondent: I'll be there at 7
Ash: ok baby
Respondent: Text me the address at 6:45 honey
Ash: ok baby
Ash: 100 w condom right baby
Respondent: Any bank
Respondent: Bbbj
Ash: 50 extra bby
Respondent: 100 is cool. I can come earlier if better for you
Ash: what times good bby
Respondent: 6:30
Ash: ok bby ill be ready by then
Ash: 101 divine dr

6. Respondent established throughout his text messages with Ash that he would pay \$100 for one hour of sex using a condom.

7. On March 11, 2022, at approximately 6:30 pm, Respondent appeared at the address given to him by Ash in the text messages. Once he arrived at that address, Respondent was then directed by text message to a second address, 307 Kettering Drive in Davenport, Florida. When Respondent arrived at the second address, he went in the building and met with a woman. Once inside, Respondent verbally acknowledged to the woman that he was there for sex and paid \$100 in cash to her. Shortly after he tendered his payment, Respondent was arrested.

8. On March 17, 2022, Respondent was charged in a one-count information with soliciting for prostitution, in the matter entitled, *State of Florida vs. Daniel Peters*, 2022MM001397 (Polk County, Florida), in violation of Florida Statute 796.07.

9. On or about May 17, 2022, Respondent pled no contest in case number 2022MM001397. On that date, the Honorable Robert G. Fegers withheld adjudication and

sentenced Respondent to 12 months of probation, ordered him to complete 100 hours of community service, complete an online human trafficking class, submit to STD/HIV testing, forfeit his cell phone, stay away from the incident location and pay a \$5,000.00 civil penalty.

10. As a result of Respondent's no contest plea and the conduct described above, Respondent has engaged in the following misconduct:

- a. committing a criminal act that reflects adversely on his honesty, trustworthiness or fitness as a lawyer in other respects, by engaging in the crime of soliciting for prostitution, in violation of Florida Statute 796.07, and in violation of Rule 8.4(b) of the Illinois Rules of Professional Conduct (2010); and
- b. engaging in conduct that is prejudicial to the administration of justice, in violation of Rule 8.4(d) of the Rules of Professional Conduct (2010), by virtue of Respondent having engaged in criminal conduct of soliciting for prostitution, in violation of Florida Statute 796.07, in violation Florida Statute 796.07.

COUNT II

(Making a false statement in connection with a disciplinary matter and dishonest conduct)

1-9. The Administrator realleges the facts set forth in paragraphs one through nine, above.

10. On March 17, 2022, based on news stories reported in the Chicago news media related to Respondent's arrest, no contest plea and sentencing, the Administrator docketed a matter as Investigation Number 2022IN00875.

11. On June 24, 2022, counsel for the Administrator sent a letter to Respondent asking him, in part, to describe in detail the circumstances and events leading up his arrest for soliciting for prostitution.

12. On August 24, 2022, the Administrator received an email response from Respondent in relation to Investigation Number 2022IN00875. In his email, Respondent stated with reference to his arrest as follows: "After several rounds of golf that week, I made an

appointment for a massage at a place that I found online. I arrived at the location, paid the fee and after exchanging greetings with the masseuse I was placed under arrest immediately. I later was told that this was a police sting operation and over 100 people were arrested in a similar fashion.”

13. Respondent’s statements in his email response, that he had made an appointment with a masseuse for a massage, was false, because Respondent knew when he was sending his series of text messages and appeared at the designated location, that he was negotiating and making an appointment for sex and not for a massage.

14. At the time he made the statements to the Administrator, described in paragraph 12 above, Respondent knew that his statements were false.

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

- a. knowingly making a false statement of material fact in connection with a disciplinary matter by making the false statements, described in paragraph 12, above, in violation of Rule 8.1(a) of the Illinois Rules of Conduct (2010); and
- c. conduct involving dishonesty, fraud, deceit or misrepresentation by making the false statements, described in paragraph 12, above, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

WHEREFORE, the Administrator respectfully requests that this matter be assigned to a panel of the Hearing Board, that a hearing be held pursuant to Supreme Court Rule 761, and that the panel make findings of fact, conclusions of fact and law, and a recommendation for such discipline as is warranted.

Respectfully submitted,

Jerome Larkin, Administrator
Illinois Attorney Registration and
Disciplinary Commission

By: /s/Christine P. Anderson
Christine P. Anderson

Christine Anderson
Counsel for Administrator
One Prudential Plaza
130 East Randolph Drive, #1500
Chicago, Illinois 60601
Telephone: (312) 540-5290
Facsimile: (312) 565-2320
E-mail: canderson@iadc.org

MAINLIB_#1604414_v1