2017PR00059

FILED 9/13/2023 1:42 PM ARDC Clerk

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

In the Matter of:

JAIME TEODORO ZEAS,

Commission No. 2017PR00059

Attorney-Respondent,

No. 6288733.

NOTICE OF FILING

TO: Jonathan Wier Counsel for the Administrator jwier@iardc.org ARDCeService@iardc.org

PLEASE TAKE NOTICE that on September 13, 2023 I have filed **Respondent's Answer** to the Complaint with the Clerk of the Attorney Registration and Disciplinary Commission, a copy of which is herewith served upon you.

BY: <u>/s/ Stephanie Stewart</u> Stephanie Stewart

Stephanie Stewart Robinson, Stewart, Montgomery & Doppke LLC 33 North Dearborn Street, Suite 1420 Chicago, IL 60602 (312) 782-5102 sstewart@rsmdlaw.com

CERTIFICATE OF SERVICE

The undersigned, being first duly sworn upon oath, deposes and states that (s)he served a copy of the foregoing document via email to the named attorney(s) of record at the above email addresses on September 13, 2023.

/s/ Stephanie Stewart

[[]x] Under penalties as provided by law pursuant to 735 ILCS 5/1-109, I certify that the statements set forth herein are true and correct.

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In the Matter of:

JAIME TEODORO ZEAS,

Attorney-Respondent,

Commission No. 2017PR00059

No. 6288733.

ANSWER TO COMPLAINT

Jaime Teodoro Zeas, Respondent, by his attorney, Stephanie Stewart, of Robinson, Stewart, Montgomery & Doppke LLC, answers the complaint filed by the Administrator in this matter, as follows:

1. On May 24, 2015, a McHenry County Grand Jury indicted Respondent on one count of the offense of child pornography, a Class 1 felony, in the matter of *The People of the State of Illinois v. James T. Zeas*, docket number 15CF000297, in the Circuit Court of the Twenty Second Judicial Circuit, McHenry County. Count One of the indictment charged that Respondent committed the offense of child pornography, in that Respondent knowingly filmed A.S., a child whom defendant knew or reasonably should have known to be under the age of 18 years, depicted or portrayed in any pose, posture or setting involving lewd exhibition of the unclothed fully or partially developed breasts of A.S. and where within one year of the victim attaining the age of 18, the statute of limitations was extended pursuant to Chapter 720, Section 5/3-5(a) of the Illinois Compiled Statutes to allow for a prosecution of this offense to be committed at any time, in violation of Chapter 720, Section 5/11-20.1(a)(l)(viii) of the 2009 Illinois Compiled Statutes. A certified copy of the indictment is attached as Exhibit One.

FILED 9/13/2023 1:42 PM ARDC Clerk ANSWER: Admitted that Respondent was indicted as described. Denied that Respondent engaged in the conduct alleged, or that he committed the crime charged. In further answering, Respondent's habeas petition remains pending before the 7th Circuit Court of Appeals.

2. On February 3, 2017, following a bench trial before the Hon. Michael Feetterer, Respondent was found guilty on Count One of the indictment.

ANSWER: Admitted.

3. On June 14, 2017, the Hon. Sharon Prather sentenced Respondent to four years imprisonment in the Illinois Department of Corrections. A certified copy of Respondent's conviction and sentencing order is attached as Exhibit Two.

ANSWER: Admitted.

4. By reason of the conduct outlined above, Respondent has engaged in the

following misconduct:

a. committing a criminal act that reflects adversely on the lawyer's honesty, trustworthiness or fitness as a lawyer in other respects, in violation of Rule 8.4(b) of the Illinois Rules of Professional Conduct by conduct including committing the offense of child pornography, in violation of 720 ILCS §5/11-20.1(a)(1)(vii).

ANSWER: Denied.

Respectfully submitted, Jaime Teodoro Zeas

/s/ Stephanie Stewart Stephanie Stewart

Stephanie Stewart Robinson, Stewart, Montgomery & Doppke LLC 33 North Dearborn Street, Suite 1420 Chicago, IL 60602 (312) 782-5102 sstewart@rsmdlaw.com