

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

In the Matter of:

JOSEPH SHUN MENDOZA RAVAGO,

Attorney-Respondent,

No. 6244768.

Commission No. 2024PR00051

COMPLAINT

Lea S. Gutierrez, Administrator of the Attorney Registration and Disciplinary Commission, by her attorney, Richard Gleason, pursuant to Supreme Court Rule 761(c), complains of Respondent, Joseph Shun Mendoza Ravago, who was licensed to practice law in Illinois on May 7, 1998, and alleges that Respondent has engaged in the following conduct, which subjects Respondent to discipline pursuant to Supreme Court Rule 770:

*(Criminal Convictions for Domestic Battery and Interfering with the Reporting of Domestic Violence)*

1. At all times alleged in this complaint, there was in effect a criminal statute in Illinois, Chapter 720, Section 5/19-1(a) of the Illinois Compiled Statutes, entitled “burglary,” which made it a Class 3 felony offense to knowingly and without authority, without causing damage, enter a motor vehicle with the intent to commit a felony therein.

2. At all times alleged in this complaint, there were in effect criminal statutes in Illinois, Chapter 720, Sections 12-7.3(a)(1) and 12-7.3(a)(2) of the Illinois Compiled Statutes, entitled “stalking,” which made it a Class 4 felony to knowingly engage in a course of conduct directed at another while knowing that the course of conduct would cause a reasonable person to fear for their safety, and to knowingly engage in conduct directed at another while knowing that

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the course of conduct would cause a reasonable person to suffer emotional distress.

3. At all times alleged in this complaint, there was in effect a criminal statute in Illinois, Chapter 720, Section 5/21-2.5 of the Illinois Compiled Statutes, entitled “unlawful use of an electronic tracking device,” which made it a Class A misdemeanor to use an electronic tracking device to determine the location or movement of another person.

4. Between May of 2021 and June of 2022, Respondent and an individual identified in this complaint as J.Z. engaged in a romantic relationship. In April of 2022, J.Z. drove her car to visit Respondent at his law office in Chicago. While J.Z. was at his office, and unbeknownst to J.Z., Respondent placed an electronic tracking device underneath the front passenger seat in J.Z.’s car. Respondent placed the electronic tracking device in J.Z.’s car so that he could monitor J.Z.’s location and surveil her without her knowledge.

5. Prior to placing the electronic tracking device in J.Z.’s car, Respondent did not know the location of J.Z.’s residence. Using the information from the tracking device he placed in J.Z.’s car, Respondent discovered the location of J.Z.’s residence, and thereafter travelled to J.Z.’s residence multiple times, without J.Z.’s knowledge, to surveil J.Z. On two of those occasions, Respondent placed new electronic tracking devices on the undercarriage of J.Z.’s car. Respondent placed the subsequent electronic tracking devices on J.Z.’s car because he was concerned that the prior devices would run out of battery power, which would render him unable to continue his secret surveillance of J.Z.

6. On July 28, 2022, while cleaning the inside of her car, J.Z. found the electronic tracking device Respondent placed underneath the front passenger seat of her car, described in paragraph five, above. J.Z. contacted the police to report her discovery of the electronic tracking device.

7. As part of their investigation of J.Z.'s report, described in paragraph six, above, police investigators used the serial number on the electronic tracking device J.Z. found in her car to determine that Respondent was the individual who had both purchased and activated the device. Next, by using cell tower data they obtained through a warrant, police investigators learned that Respondent was in the immediate area of J.Z.'s residence on nine separate occasions between April 27, 2022 and May 21, 2022.

8. On October 26, 2022, police officers placed Respondent under arrest for his secret surveillance of J.Z. On January 10, 2023, a grand jury in Cook County charged Respondent with three felony counts stemming from the same conduct. Count One charged Respondent with the felony offense of burglary without causing damage, in violation of Chapter 720, Section 5/19-1(a) of the Illinois Compiled Statutes. Counts Two and Three charged Respondent with the felony offense of stalking, in violation of Chapter 720, Section 5/12-7.3(a)(1) and 12-7.3(a)(2) of the Illinois Compiled Statutes. The Cook County Clerk of the Circuit Court entitled the matter *People of the State of Illinois v. Joseph S. Ravago*. The case was assigned to the Hon. Marc Martin.

9. On July 27, 2023, the Cook County State's Attorney's Office ("CCSAO") voluntarily dismissed Count One (burglary) and Count Three (stalking). The CCSAO amended the stalking charge in Count Two to unlawful use of an electronic tracking device, a Class A misdemeanor, in violation of Chapter 720, Section 5.0/21-2.5-B of the Illinois Compiled Statutes. On the same day, Respondent pled guilty to the amended Count Two. Judge Martin sentenced Respondent to one year of court supervision and ordered Respondent to pay \$437 in fines and costs. Judge Martin further granted J.Z. a three-year order of protection, scheduled to terminate on July 23, 2026, which prohibits Respondent from having any contact with J.Z.

10. By reason of the conduct and convictions described 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, by conduct including unlawfully using an electronic tracking device, in violation of Chapter 720, Section 5.0/21-2.5-B of the Illinois Compiled Statutes, in violation of Rule 8.4(b) of the Illinois Rules of Professional Conduct (2010); and
- b. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including secretly placing electronic tracking devices on the inside and outside of J.Z.'s car and surveilling J.Z. for weeks without her knowledge, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010),

WHEREFORE, the Administrator requests that this matter be assigned to a panel of the Hearing Board, that a hearing be held pursuant to 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,

Lea S. Gutierrez, Administrator  
Attorney Registration and  
Disciplinary Commission

By: /s/ Richard Gleason  
Richard Gleason

Richard Gleason  
Counsel for the Administrator  
130 East Randolph Drive, Suite 1500  
Chicago, Illinois 60601  
Telephone: (312) 565-2600  
Email: Email: [ARDEeservice@iadc.org](mailto:ARDEeservice@iadc.org)  
Email: [rgleason@iadc.org](mailto:rgleason@iadc.org)

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