

IN THE SUPREME COURT OF ILLINOIS

In the Matter of:

GERARDO LARA DEAN,  
Attorney-Respondent,  
No. 6288106.

Supreme Court No. M.R.  
Commission No.

MOTION PURSUANT TO SUPREME COURT RULE 762(a)

The undersigned, Gerardo Lara Dean, respectfully represents to the Court that:

1. On May 4, 2006, Movant was licensed by the Court to practice law in the State of Illinois.
2. Movant desires to have his name stricken from the Roll of Attorneys licensed to practice law in Illinois pursuant to Illinois Supreme Court Rule 762(a).

WHEREFORE, the undersigned requests that his name be stricken from the Roll of Attorneys licensed to practice law in Illinois.



Gerardo Lara Dean

DATE: 10/20/2026

4928-1966-1274, v. 1

FILED

October 20, 2026

ARDC CLERK

E-FILED  
10/20/2026 1:10 PM  
CYNTHIA A. GRANT  
SUPREME COURT CLERK

## IN THE SUPREME COURT OF ILLINOIS

In the Matter of:

GERARDO LARA DEAN,

Movant,

No. 6288106.

Supreme Court No. M.R.

Commission No. 2026PR00064

STATEMENT OF CHARGES  
PURSUANT TO SUPREME COURT RULE 762(a)

Lea S. Gutierrez, Administrator of the Attorney Registration and Disciplinary Commission, by her attorney, Richard Gleason, pursuant to Supreme Court Rule 762(a), states that on the date Movant, Gerardo Lara Dean (hereinafter "Movant"), filed a motion requesting that his name be stricken from the Roll of Attorneys licensed to practice law in Illinois, the Administrator was investigating the conduct that formed the basis for Movant's plea of guilty in the United States District Court for the Northern District of Illinois, for the crime of conspiring to unlawfully encourage and induce aliens to come to, enter, and reside in the United States in the matter of *United States of America v. Gerardo Dean*, case number 1:24-cr-00598. Had Movant's conduct been the subject of a hearing, the evidence described below would clearly and convincingly establish the following facts and conclusions of misconduct:

## I. FACTUAL BACKGROUND

Movant's admissions and records from various courts, including the August 5, 2026 plea agreement entered in case number 1:24-cr-00598, would have established the following facts:

1. Movant is 60 years old, and he was licensed to practice law in Illinois on May 4, 2006. Respondent has a business address is Chicago. Commission records show that Respondent is registered to practice law in 2026.

FILED

October 20, 2026

E-FILED  
10/20/2026 1:10 PM  
CYNTHIA A. GRANT  
SUPREME COURT CLERK

ARDC CLERK

2. On December 16, 2024, a federal grand jury in the Northern District of Illinois charged Movant in a four-count criminal indictment with the offenses of conspiring to unlawfully encourage and induce aliens to come to, enter, and reside in the United States (Count One), and unlawfully encouraging and inducing aliens to come to, enter, and reside in the United States for the purpose of commercial advantage and private financial gain (Counts Two, Three, and Four). The matter was captioned *United States of America v. Gerardo Dean*, docket number 1:24-cr-00598, and assigned to the Honorable Manish S. Shah.

3. The indictment alleged that Movant was an attorney licensed to practice law in the State of Illinois, and that he operated a law office in Chicago where he practiced immigration law. The indictment further alleged that Movant's co-conspirator was an employee of "Company A," which operated skilled-nursing facilities in the Northern District of Illinois. The indictment alleged that Company A was Movant's client.

4. The indictment further alleged that the United States Citizenship and Immigration Services ("USCIS") was an agency of the United States responsible for, among other things, adjudicating immigrant and nonimmigrant visa petitions. The indictment further alleged that the United States Department of State was an agency of the United States responsible for, among other things, interviewing at overseas U.S. embassies or consulates foreign nationals applying for employment visas.

5. The indictment alleged that the H-1B visa program allowed U.S. companies to temporarily employ foreign nationals with specialized or technical expertise in a particular field. The indictment further alleged that employers utilizing the H-1B visa program could retain immigration lawyers to navigate the petition process, including by preparing petitions on behalf of

employers and communicating with the United States Department of Labor and USCIS about the petitions.

6. The indictment further alleged that the EB-2 visa program allowed foreign nationals with master's degrees or equivalent qualifications who were to be employed by U.S. companies to obtain lawful permanent resident status. The indictment further alleged that employers utilizing the EB-2 visa program could retain immigration lawyers to navigate the petition process, including by preparing petitions on behalf of employers and communicating with the United States Department of Labor and USCIS about the petitions.

7. The indictment alleged that beginning in or around June of 2011, and continuing until at least May of 2015, in the Northern District of Illinois, Eastern Division, and elsewhere, Movant and a co-conspirator identified citizens of the Philippines who sought to immigrate or remain in the United States and agreed to help those foreign nationals unlawfully obtain H-1B and EB-2 visas to live and work in the United States in exchange for monetary payments from the foreign nationals.

8. The indictment further alleged that it was part of the conspiracy that Movant and his co-conspirator filed and caused to be filed fraudulent H-1B and EB-2 visa petitions representing that the foreign nationals had certain jobs at higher rates of pay waiting for them at Company A when Movant and his co-conspirator knew that the foreign nationals would instead work different jobs at lower rates of pay at the company than those stated in the visa petitions.

9. The indictment alleged that it was further part of the conspiracy that Movant and his co-conspirator told foreign nationals that Company A would hire the foreign nationals as staff or registered nurses but that the foreign nationals' visa petitions would fraudulently represent that Company A would employ the foreign nationals at managerial, supervisory, or other higher level

positions in order to increase the likelihood that the visa petitions would be approved and the visas would be promptly issued to the foreign nationals.

10. The indictment alleged that it was further part of the conspiracy that Movant and his co-conspirator sent and caused to be sent two different employment documents to foreign nationals who they helped to unlawfully obtain H-1B or EB-2 visas: (a) a fraudulent employment document between the foreign national and Company A for a managerial, supervisory, or other higher level position at a higher rate of pay; and (b) the actual employment document between the foreign national and Company A for a staff or registered nurse position at a lower rate of pay.

11. The indictment further alleged that it was part of the conspiracy that Movant and his co-conspirator instructed foreign nationals to take the fraudulent employment document between the foreign national and Company A to their overseas consular interview and to not take the actual employment document between the foreign national and Company A to the interview. The indictment alleged that Movant and his co-conspirator instructed foreign nationals to provide false information during their overseas consular interviews by representing that the foreign nationals would be employed at Company A in managerial, supervisory, or other higher level positions at a higher rate of pay when Movant and his co-conspirator knew that the foreign nationals would be employed at Company A as staff or registered nurses, which were not managerial, supervisory, or other higher level positions, at a lower rate of pay.

12. The indictment further alleged that it was part of the conspiracy that Movant and his co-conspirator knew that U.S. immigration officials had a higher likelihood of approving a fraudulent H-1B or EB-2 visa petition that represented that Company A would employ a foreign national in a managerial, supervisory, or other higher level position and promptly issue a visa to

that foreign national than a true and correct visa petition that represented that Company A would employ the foreign national as a staff or registered nurse.

13. The indictment further alleged that it was part of the conspiracy that Movant and his co-conspirator falsely certified and caused others to falsely certify in documents submitted to the United States Department of Labor and USCIS that foreign nationals applying for H-1B or EB-2 visas would be employed by Company A in managerial, supervisory, or other higher level positions at a specified rate of pay when Movant and his co-conspirator knew that was not true.

14. The indictment alleged that it was further part of the conspiracy that Movant and his co-conspirator collected and caused to be collected monetary payments from foreign nationals who they helped fraudulently obtain H-1B or EB-2 visas to work at Company A and that Movant also collected monetary payments from Company A for helping foreign nationals fraudulently obtain H-1B and EB-2 visas. The indictment further alleged that it was further part of the conspiracy that Movant and his co-conspirator took steps to encourage and induce foreign nationals to unlawfully come to, enter, and reside in the United States.

15. Count One of the indictment alleged that Movant committed the offense of conspiring to unlawfully encourage and induce aliens to come to, enter, and reside in the United States, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv), all in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I).

16. Counts Two through Four of the indictment alleged that Movant committed the offense of unlawfully encouraging and inducing aliens to come to, enter, and reside in the United States for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iv) and 1324(a)(1)(B)(i).

17. On August 5, 2026, Movant entered into a plea agreement with the United States Attorney for the Northern District of Illinois in which Movant pled guilty to Count One of the indictment, which charged Movant with conspiring to unlawfully encourage and induce aliens to come to, enter, and reside in the United States, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I).

18. As part of the plea agreement, Movant agreed to surrender his license to practice of law in Illinois prior to sentencing in his criminal case, and further agreed not to seek reinstatement of his license to practice law.

19. Also on August 5, 2026, Movant appeared before Judge Shah and changed his plea from not guilty to guilty on Count One of the indictment. On the same date, Judge Shah entered a finding of guilty against Movant on Count One, and set Movant's sentencing date for December 9, 2026.

## II. CONCLUSIONS OF MISCONDUCT

20. As a result of the order of conviction described in paragraphs one through 19, above, Movant has engaged in the following misconduct:

- a. committing a criminal act that reflects adversely on Movant's honesty, trustworthiness or fitness as a lawyer in other respects, by conduct including committing the offense of conspiring to unlawfully encourage and induce aliens to come to, enter, and reside in the United States, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I), in violation of 8.4(b) of the Illinois Rules of Professional Conduct (2010).

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 60601-6219  
Telephone: (312) 565-2600  
Email: [rgleason@iadc.org](mailto:rgleason@iadc.org)  
Email: [ARDCeService@iadc.org](mailto:ARDCeService@iadc.org)  
4910-6657-3527, v. 2

## IN THE SUPREME COURT OF ILLINOIS

In the Matter of:

GERARDO LARA DEAN,

Attorney-Movant,

No. 6288106.

Supreme Court No. M.R.

Commission No. 2026-0001

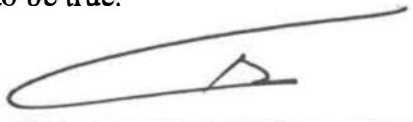
AFFIDAVIT

Gerardo Lara Dean, being first duly sworn, on oath states that:

1. Affiant has signed a motion to strike his name from the Roll of Attorneys admitted to practice law in Illinois, pursuant to Rule 762(a).
2. Affiant has received from the Administrator of the Attorney Registration and Disciplinary Commission a copy of the Statement of Charges pending against him.
3. Affiant stipulates that if the charges set forth in the Statement of Charges proceeded to hearing, the judgment of conviction would be offered into evidence and would constitute conclusive evidence of his guilt of the crime for purposes of disciplinary proceedings.
4. Affiant's motion to strike his name from the Roll of Attorneys admitted to practice in Illinois is freely and voluntarily made.
5. Affiant understands the nature and consequences of said motion.

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 aforesaid that he verily believes the same to be true.

10/19/2026  
Date

  
Gerardo Lara Dean

4927-7637-3464, v. 1

FILED

October 20, 2026

ARDC CLERK

E-FILED  
10/20/2026 1:10 PM  
CYNTHIA A. GRANT  
SUPREME COURT CLERK

IN THE SUPREME COURT OF ILLINOIS

In the Matter of:

GERARDO LARA DEAN,

Movant,

No. 6288106.

Supreme Court No. M.R.

Commission No. 2026PR00064

NOTICE OF FILING

TO: Vadim A. Glozman  
Counsel for Movant  
333 W. Wacker Drive, Suite 1420  
Chicago, IL 60606

PLEASE TAKE NOTICE that on October 20, 2026, electronic copies of Movant's MOTION PURSUANT TO SUPREME COURT RULE 762(a), Administrator's STATEMENT OF CHARGES, and Movant's AFFIDAVIT, were submitted to the Clerk of the Supreme Court for filing. On that same date, copies were served on Movant, by mail, address above, at or before 5:00 p.m.

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 60601-6219  
Telephone: (312) 565-2600  
Email: [rgleason@iadc.org](mailto:rgleason@iadc.org)  
Email: [ARDCeService@iadc.org](mailto:ARDCeService@iadc.org)

**FILED**

October 20, 2026

**ARDC CLERK**

E-FILED  
10/20/2026 1:10 PM  
CYNTHIA A. GRANT  
SUPREME COURT CLERK

## PROOF OF SERVICE

The undersigned, an attorney, hereby certifies, pursuant to the Illinois Code of Civil Procedure, 735 ILCS 5/109, that the Administrator served copies of the Notice of Filing, Movant's MOTION PURSUANT TO SUPREME COURT RULE 762(a), Administrator's STATEMENT OF CHARGES PURSUANT TO SUPREME COURT RULE 762(a) and Movant's AFFIDAVIT, on the individual listed on the forgoing Notice of Filing, by mail at the address listed on the Notice of Filing, on October 20, 2026, at or before 5:00 p.m.

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 he verily believes the same to be true.

/s/ Richard Gleason

Richard Gleason

FILED

October 20, 2026

ARDC CLERK

E-FILED

10/20/2026 1:10 PM

CYNTHIA A. GRANT

SUPREME COURT CLERK