

**ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION
IN THE SUPREME COURT OF ILLINOIS**

In the Matter of:)
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) Supreme Court No:
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Brian T. Jant Esq)
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KWAME RAOUL ATTORNEY DISBARMENT COMPLAINT

The Respondent Attorney General, Kwame Raoul is charged with violating ARDC Rules

5.1 , 8.4 (c) & (d) :

RULE 5.1: RESPONSIBILITIES OF PARTNERS, MANAGERS, AND SUPERVISORY LAWYERS

(a) A partner in a law firm, and a lawyer who individually or together with other lawyers possesses comparable managerial authority in a law firm, shall make reasonable efforts to ensure that the firm has in effect measures giving reasonable assurance that all lawyers in the firm conform to the Rules of Professional Conduct.

(b) A lawyer having direct supervisory authority over another lawyer shall make reasonable efforts to ensure that the other lawyer conforms to the Rules of Professional Conduct.

(c) A lawyer shall be responsible for another lawyer's violation of the Rules of Professional Conduct if:

(1) the lawyer orders or, with knowledge of the specific conduct, ratifies the conduct involved; or

(2) the lawyer is a partner or has comparable managerial authority in the law firm in which the other lawyer practices, or has direct supervisory authority over the other lawyer, and knows of the conduct at a time when its consequences can be avoided or mitigated but fails to take reasonable remedial action.

RULE 8.4: MISCONDUCT

It is professional misconduct for a lawyer to:

(a) violate or attempt to violate the Rules of Professional Conduct, knowingly assist or induce another to do so, or do so through the acts of another.

(b) commit a criminal act that reflects adversely on the lawyer's honesty, trustworthiness, or fitness as a lawyer in other respects.

(c) engage in conduct involving dishonesty, fraud, deceit, or misrepresentation.

(d) engage in conduct that is prejudicial to the administration of justice.

Complaint filed a attorney Disbarment Complaint against Assistant Attorney General on 8/22/20 which is incorporated herein by reference marked as Exhibit A.

(b) Attorney General, Kwame Raoul having direct supervisory authority over Assistant

Attorney Brian T. Jant, failed to make reasonable efforts to ensure that Briant T. Jant conforms

to the Illinois Rules of Professional Conduct.. Instead Kwame Raoul as used Brian T. Jant, as a shield, to protect himself from charges of professional misconduct, associated with the conduct alleged misconduct contained in the Brian T Jant Attorney Disbarment Complaint **Exhibit A**, by directing Mr Brian T. Jant to instruct Daniel Chung (**Exhibit 1¹**) , Danica Jackson (**Exhibit 2**) and Ryan Elliott (**Exhibit 3**) not to obey their subpoena's and not to Appear before the 18th Judicial Circuit Court of DuPage County, Room 2005 at 9:00 am and not to testify.

(c) Attorney General, Kwame Raoul is directly responsible for Assistant Attorney General Brian T. Jant professional misconduct alleged in the attached disbarment Complaint (**Exhibit A**) because Attorney General, Kwame Raoul :

(1)ordered Brian T Jant, with knowledge of the specific misconduct alleged in the attached attorney disbarment complaint, Kwame Raoul ratified the conduct involved; and

(2) Attorney General, Kwame Raoul, is the Illinois Attorney General, with managerial authority in the Illinois Attorney General's Office in which Brian T Jant practices, and has direct supervisory authority over Brian T Jant and knows of the misconduct conduct alleged in the attached Disbarment Complaint (**Exhibit A**) at a time when its consequences can be avoided or mitigated, but fails to take reasonable remedial action, by endorsing and redefying the professional misconduct conduct of Assistant Attorney General Brian T Jant see Attorney Disbarment Complaint (**Exhibit A**) incorporated herein by reference.

(3). Attorney General, Kwame Raoul is liable under the Illinois Rules of Professional Conduct 5.1 for the Professional misconduct charged against his Assistant Attorney General Brian T. Jant in the attached disbarment Complaint (Exhibit A)

The Attorney Registration and Disciplinary Commission was established by the Illinois Supreme Court in 1973 to deal with issues of professional misconduct of attorneys. The serious allegations of **professional misconduct** that the Complainant has raised are issues that must be resolved the by ARDC. The issues of professional misconduct raised by the Complainant in this complaint are issues that the Commission is solely empowered to act upon under the Illinois Rules of Professional Misconduct and not an court of law.

¹ Exhibit 1, 2 & 3 are incorporated herein by reference and are attached to the Brian T Jant Attorney Disbarment Complaint which is marked as Exhibit A.

WHEREFORE, Complainant prays that the Inquiry Board immediately assign this matter to a hearing, panel, that a date for hearing be immediately set, that the hearing be conducted and that the panel make findings of fact, conclusions of law and a recommendation for such discipline as is warranted by its findings.

That the ARDC issue an order to suspend Kwame Raoul
from the practice of law pending its investigation.

/s/Christopher Stoller

Date: August 22, 2020

Certificate of Mailing

I hereby certify that this Attorney Disbarment complaint is being served by via email on the ARDC and/or deposited with the U.S. Postal Service as first Class mail in an envelope addressed to:

Illinois Attorney Registration
and Disciplinary Commission
130 N. Randolph Street, Suite 1500
Chicago, Illinois 60601

/s/Christopher Stoller
Date: August 22, 2020

EXHIBIT A

**ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION
IN THE SUPREME COURT OF ILLINOIS**

In the Matter of:)
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) Supreme Court No:
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Brian T. Jant Esq)
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BRIAN T. JANT ATTORNEY DISBARMENT COMPLAINT

The Respondent Assistant Attorney General, Brian Jant Cook is charged with violating ARDC Rules 8.4 (c) & (d) :

RULE 8.4: MISCONDUCT

It is professional misconduct for a lawyer to:

(a) violate or attempt to violate the Rules of Professional Conduct, knowingly assist or induce another to do so, or do so through the acts of another.

(b) commit a criminal act that reflects adversely on the lawyer's honesty, trustworthiness, or fitness as a lawyer in other respects.

(c) engage in conduct involving dishonesty, fraud, deceit, or misrepresentation.

(d) engage in conduct that is prejudicial to the administration of justice.

The Attorney Registration and Disciplinary Commission was established by the Illinois Supreme Court in 1973 to deal with issues of professional misconduct of attorneys. The serious allegations of **professional misconduct** that the Complainant has raised are issues that must be resolved by the ARDC. The issues of professional misconduct raised by the Complainant in this complaint are issues that the Commission is solely empowered to act upon under the Illinois Rules of Professional Misconduct and not a court of law.

BRIAN T. JANT ATTORNEY ,COMPLAINANT VIOLATED RULE 8.4(d) ENGAGED IN CONDUCT THAT WAS PREJUDICIAL TO THE ADMINISTRATION OF JUSTICE¹

Christopher Stoller caused to be served, valid Witness Subpoena(s)² on third parties, not defendants, Daniel Chung (**Exhibit 1**) , Danica Jackson (**Exhibit 2**) and Ryan Elliott (**Exhibit**

¹ **EXAMPLE OF CONDUCT THAT IS PREJUDICIAL TO THE ADMINISTRATION OF JUSTICE AND/OR OBJECTION OF JUSTICE**

Telling a witness to **not** to come to court and testify just like Brian T. Jant did to Daniel Chung, Danica Jackson and Ryan Elliott. 720 ILCS 5/31-4.
<https://www.criminallawyerillinois.com/2010/07/27/what-is-obstruction-of-justice-according-to-illinois-law/>

² Illinois subpoenas are governed by Supreme Court Rule 204(a)(1)

3) to Appear before the 18th Judicial Circuit Court of DuPage County, Room 2005 at 9:00 am.

Complainant BRIAN T. JANT who does **not** represent Daniel Chung, Danica Jackson and Ryan Elliott (Third parties), advised them to ignore the Complainant's subpoenas. . BRIAN T. JANT advised them to ignore the Complainant's subpoenas and to not come to court to testify.

Complainant Brian T. Jant had "no standing"³, no authority to advise Daniel Chung, Danica Jackson and Ryan Elliott to ignore the Complainant's valid Subpoena's (Exhibit 1,2 &#). In doing so Brian T. Jant violated the Illinois Rules of Professional Conduct, engaged in conduct that was in violation of ARDC Rule 8.4(d) **IN CONDUCT THAT WAS PREJUDICIAL TO THE ADMINISTRATION OF JUSTICE.**

Christopher Stoller incorporates his affidavit insupport of this complaint herein by reference which is attached hereto and made a part hereof.

WHEREFORE, Complainant prays that the Inquiry Board immediately assign this matter to a hearing, panel, that a date for hearing be immediately set, that the hearing be conducted and that the panel make findings of fact, conclusions of law and a recommendation for such discipline as is warranted by its findings.

That the ARDC issue an order to suspend BRIAN T. JANT
from the practice of law pending its investigation he is a danger to the legal system..

/s/Christopher Stoller

Date: August 22, 2020

³ IN THE U.S. DIST COURT FOR THE N. D. OF IL, EASTERN DIVISION, DIANE PARKER, v. FOUR SEASONS HOTELS, LTD., . Case No. 12 C 3207 Hon. Harry D. Leinenweber Case: 1:12-cv-03207 Document #: 84 Filed: 05/06/13 Page 1 of 26 citing to *Kessel v. Cook County*, No. 00 C 3980, 2002 U.S. Dist. LEXIS 4185 at *5-6 (N.D. Ill. Mar. 13, 2002).

Certificate of Mailing

I hereby certify that this Attorney Disbarment complaint is being served by via email on the ARDC and/or deposited with the U.S. Postal Service as first Class mail in an envelope addressed to:

Illinois Attorney Registration
and Disciplinary Commission
130 N. Randolph Street, Suite 1500
Chicago, Illinois 60601

/s/Christopher Stoller
Date: August 22, 2020

**ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION
IN THE SUPREME COURT OF ILLINOIS**

In the Matter of:)
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) Supreme Court No:
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Brian T. Jant Esq)
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AFFIDAVIT OF CHRISTOPHER STOLLER

CHRISTOPHER STOLLER, 72, *sui juris*, on oath states that:

- 1. I am the Complainant in the action.
- 2. That the following facts are true to the best of my belief or knowledge based upon my own personal knowledge. If called to testify, I would testify to same.
- 3. Christopher Stoller caused to be served, valid Witness Subpoena(s)⁴ on third parties, not defendants, Daniel Chung (**Exhibit 1**) , Danica Jackson (**Exhibit 2**) and Ryan Elliott (**Exhibit 3**) to Appear before the 18th Judicial Circuit Court of DuPage County, Room 2005 at 9:00 am.
- 4, Complainant BRIAN T. JANT, who does **not** represent Daniel Chung, Danica Jackson and Ryan Elliott (Third parties). . BRIAN T. JANT advised them to ignore the Complainant’s subpoenas and to not come to court to testify.

Affivant saysth not */s/Christopher Stoller*

Under penalties as provided by law pursuant to § 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/C. Stoller 8-22-20

⁴ Illinois subpoenas are governed by Supreme Court Rule 204(a)(1)

EXHIBIT 1

STATE OF ILLINOIS UNITED STATES OF AMERICA
IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT COUNTY OF DU PAGE

Michael Stoller
GRIEVANT PLAINTIFF/
APPELLANT(s) Christopher
Stoller Leo Stoller

2020 MR 349

CASE NUMBER

ILLINOIS vs
DEPT OF
HUMAN RESOURCES
DEFENDANT/RESPONDENTS

File Stamp Here

TO: DANIEL CHUNG

GREETINGS:

WITNESS SUBPOENA

PLEASE CHECK THIS BOX IF YOU ARE REQUIRING THAT ONLY THE WITNESS APPEAR AT THIS HEARING

YOU ARE HEREBY SUMMONED AND COMMANDED TO APPEAR before the 18th Judicial Circuit Court of DuPage County, Room 2005 at the

DuPage Judicial Center, 505 North County Farm Road, Wheaton, Illinois 60187

at 9:00 AM on JUNE 25TH, 2020

SUBPOENA DUCES TECUM

PLEASE CHECK THIS BOX IF YOU ARE REQUESTING THAT THE WITNESS BRING RECORDS OR DOCUMENTS FOR THIS HEARING

YOU ARE FURTHER COMMANDED TO PRODUCE AT THE TIME AND PLACE AFORESAID, the following documents or tangible things which constitutes evidence relating to the said cause and which are listed below:

All E-MAILS DOCUMENTS IN REFERENCE TO DAMICA JACKSON ASKING FOR GIFTS OF THE \$ 400.00 WATCH AND BOTTLE OF WINE, ALL REPORTS FILED WITH ANY 3RD PARTIES WITH THE ILLINOIS DEPT OF HUMAN RESOURCES OFFICE OF THE INSPECTOR GENERAL. ALL INTERNAL INVESTIGATION DOCUMENTS FROM FEB-2020 TO JUNE 4, 2020 TO ANY PERSON IN REFERENCE TO CHRIS STOLLER, LEO STOLLER MICHAEL STOLLER DAMICA JACKSON IN REFERENCE TO THE ABOVE MATTER.

then and there testify, and the truth to speak concerning those things of which you may have knowledge, and the import of such documents or tangible things concerning the above captioned cause now pending and undetermined in this Court on the part of CASE 2020 MR 349 AND Michael Stoller's CARE CASE

YOUR FAILURE TO COMPLY WITH THIS SUBPOENA CAN SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF COURT

NOTICE TO WITNESS: The party who requested this subpoena is listed below. Any questions regarding your knowledge of the subject matter or testimony in this cause should be directed to him / her or your attorney. DO NOT CALL THE CIRCUIT COURT CLERK

Name: Christopher Stoller Pro Se

DuPage Attorney Number: 99500

Attorney for: CHRISTOPHER STOLLER

Address: 415 Wesley Ave Suite 7

City/State/Zip: OAK PARK, IL 60302

Telephone Number: 773-746-3163

Email: CNS40@HOTMAIL.COM

JUN 04 2020



Chris Kachirobas
612
Circuit Court Clerk
DEPUTY CLERK

EXHIBIT 2

STATE OF ILLINOIS UNITED STATES OF AMERICA COUNTY OF DU PAGE
IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT

MICHAEL STOKER
CHRIS STOKER
LEO STOKER

2020MR000349
CASE NUMBER

vs
DEPARTMENT OF
HUMAN SERVICES

File Stamp Here

TO: DANICA JACKSON GREETINGS:

WITNESS SUBPOENA

PLEASE CHECK THIS BOX IF YOU ARE REQUIRING THAT ONLY THE WITNESS APPEAR AT THIS HEARING

YOU ARE HEREBY SUMMONED AND COMMANDED TO APPEAR before the 18th Judicial Circuit Court of DuPage County, Room 2005 at the

DuPage Judicial Center, 505 North County Farm Road, Wheaton, Illinois 60187

at 9:00 AM on JUNE 25, 2020

SUBPOENA DUCES TECUM

PLEASE CHECK THIS BOX IF YOU ARE REQUESTING THAT THE WITNESS BRING RECORDS OR DOCUMENTS FOR THIS HEARING

YOU ARE FURTHER COMMANDED TO PRODUCE AT THE TIME AND PLACE AFORESAID, the following documents or tangible things which constitutes evidence relating to the said cause and which are listed below:

ALL EMAIL FROM 2020, 2019, 2018, 2017 PRODUCE THE TECK WATCH THAT WAS GIVEN TO YOU AS A GIFT. PRODUCE ALL EMAILS IN REFERENCE TO CHRIS, MICHAEL LEO STOKER TO ALL 3RD PARTIES FROM 2020, 2019, 2018, 2017. ALL RECORDS, FILES ON MICHAEL STOKER ALL EMAILS TO DANIEL CHUNG & RYAN ELLIOT.

then and there testify, and the truth to speak concerning those things of which you may have knowledge, and the import of such documents or tangible things concerning the above captioned cause now pending and undetermined in this Court on the part of STOKER ET AL V. DEPARTMENT OF HUMAN SERVICES 2020 MR00349

YOUR FAILURE TO COMPLY WITH THIS SUBPOENA CAN SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF COURT

NOTICE TO WITNESS: The party who requested this subpoena is listed below. Any questions regarding your knowledge of the subject matter or testimony in this cause should be directed to him / her or your attorney. DO NOT CALL THE CIRCUIT COURT CLERK

Name: CHRIS STOKER Pro Se

DuPage Attorney Number: 99500

Attorney for: CHRIS STOKER

Address: 415 WESLEY AVE Suite 1

City/State/Zip: BAK PARK FL 32032

Telephone Number: 773-746-3163

Email: CNS406@HOTMAIL.COM

APR 20 2020



Chris Kachiroubas
443 BY Date W. A. Metz
DEPUTY CLERK

Circuit Court Clerk

STATE OF ILLINOIS UNITED STATES OF AMERICA COUNTY OF DU PAGE
IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT

Michael Stoller
GRIEVANT/ PLAINTIFF
Appellant (s) Christopher
Stoller LEO Stoller

2020 MR. 349

CASE NUMBER

vs
Illinois Dept of
Human Resources
Defendant/ Respondent

File Stamp Here

TO: DANICA JACKSON

GREETINGS:

WITNESS SUBPOENA Amended.

PLEASE CHECK THIS BOX IF YOU ARE REQUIRING THAT ONLY THE WITNESS APPEAR AT THIS HEARING

YOU ARE HEREBY SUMMONED AND COMMANDED TO APPEAR before the 18th Judicial Circuit Court of DuPage County, Room 2005 at the

DuPage Judicial Center, 505 North County Farm Road, Wheaton, Illinois 60187

at 9:00 AM on JUNE 25TH 2020

SUBPOENA DUCES TECUM

PLEASE CHECK THIS BOX IF YOU ARE REQUESTING THAT THE WITNESS BRING RECORDS OR DOCUMENTS FOR THIS HEARING

YOU ARE FURTHER COMMANDED TO PRODUCE AT THE TIME AND PLACE AFORESAID, the following documents or tangible things which constitutes evidence relating to the said cause and which are listed below:
All EMAILS, DOCUMENTS IN REFERENCE TO THE \$40000 WATCH YOU DEMANDED AS A GIFT AND BOTTLE OF WINE FROM CHRISTOPHER. REPORTS FILED WITH ANT 3RD PARTIES INCLUDING DANIE CHUNG, COPY OF THE ILLINOIS DEPT MANUAL ON POLICY ON EMPLOYEES RECEIVING AND DEMANDING GIFTS FROM CLIENTS. REPORTS FILED WITH THE INSPECTION GENERAL INTERNAL AFFAIRS REPORTS FILED WITH DANIEL CHUNG. IDENTIFY WHO YOU GAVE THE WATCH TO. ALL REPORTS EMAILS ABOUT LEO STOLLER, CHR'S STOLLER FROM 2/1/16 TO 6/3/20 then and there testify, and the truth to speak concerning those things of which you may have knowledge, and the import of such documents or tangible things concerning the above captioned cause now pending and undetermined in this Court on the part of CASE 2020 MR 349 AND Michela Stoller CARE CASE

YOUR FAILURE TO COMPLY WITH THIS SUBPOENA CAN SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF COURT

NOTICE TO WITNESS: The party who requested this subpoena is listed below. Any questions regarding your knowledge of the subject matter or testimony in this cause should be directed to him / her or your attorney. DO NOT CALL THE CIRCUIT COURT CLERK

Name: Christoph Stoller Pro Se
DuPage Attorney Number: 99500
Attorney for: Christoph Stoller
Address: 415 Wesley Ave #1
City/State/Zip: DAK PARK, IL 60302
Telephone Number: 773-746-3163
Email: CMS406@HOTMAIL.COM



JUN 04 2020

State
Spate Lachyayilas
617
Circuit Court
DEPUTY CLERK

EXHIBIT 3

STATE OF ILLINOIS UNITED STATES OF AMERICA
IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT COUNTY OF DU PAGE

Michael Stoller
CHRIS STOLLER
LEO STOLLER

2020 MR 000349

CASE NUMBER

VS

DEPARTMENT OF
HUMAN SERVICES

File Stamp Here

TO: RYAN ELLIOTT

GREETINGS:

WITNESS SUBPOENA

PLEASE CHECK THIS BOX IF YOU ARE REQUIRING THAT ONLY THE WITNESS APPEAR AT THIS HEARING

YOU ARE HEREBY SUMMONED AND COMMANDED TO APPEAR before the 18th Judicial Circuit Court of DuPage County, Room 2005 at the

DuPage Judicial Center, 505 North County Farm Road, Wheaton, Illinois 60187

at 9:00 AM on JUNE 25, 2020

SUBPOENA DUCES TECUM

PLEASE CHECK THIS BOX IF YOU ARE REQUESTING THAT THE WITNESS BRING RECORDS OR DOCUMENTS FOR THIS HEARING

YOU ARE FURTHER COMMANDED TO PRODUCE AT THE TIME AND PLACE AFORESAID, the following documents or tangible things which constitutes evidence relating to the said cause and which are listed below:

All EMAILS FROM 2019, 2018, 2020 FROM RYAN ELLIOTT TO DANIEL CHUNG, DANICA JACKSON, ANY OTHER 3RD PARTIES, ALL REPORTS MEMORANDUMS, CASE FILES, AND VIOLETATION NOTICES, MICHAEL STOLLER'S CASE FILE

then and there testify, and the truth to speak concerning those things of which you may have knowledge, and the import of such documents or tangible things concerning the above captioned cause now pending and undetermined in this Court on the part of Stoller et al v. Department of Human Services 20MR 349

YOUR FAILURE TO COMPLY WITH THIS SUBPOENA CAN SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF COURT

NOTICE TO WITNESS: The party who requested this subpoena is listed below. Any questions regarding your knowledge of the subject matter or testimony in this cause should be directed to him / her or your attorney. DO NOT CALL THE CIRCUIT COURT CLERK

Name: CHRIS STOLLER Pro Se

DuPage Attorney Number: 99500

Attorney for: CHRIS STOLLER

Address: 415 Wesley Ave Suite 1

City/State/Zip: BARK PARK, IL 60302

Telephone Number: 723-746-3163

Email:



APR 20 2020
Chris Kachirobas
443 BY
Circ DEPUTY CLERK