

**IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN
DISTRICT OF ILLINOIS EASTERN DIVISION**

RAYMOND E. BUTLER, II,

Case No. 1:25-cv-10904

Plaintiff,

v.

GEORGIA N. ALEXAKIS, in her individual and official capacity as United States District Judge for the Northern District of Illinois;

NANCY L. MALDONADO, in her individual and official capacity as United States Circuit Judge, United States Court of Appeals for the Seventh Circuit;

and JOHN DOES 1-10 (unknown co-conspirators within the judicial enterprise),

Defendants.

MOTION TO DISQUALIFY DISTRICT JUDGE JEREMY C. DANIEL

NOW COMES, RAYMOND E. BUTLER, by and through the undersigned counsel, pursuant to 28 U.S.C. § 144 and 28 U.S.C. § 455, and hereby respectfully moves this Honorable Court for an Order of Disqualification of Judge JEREMY C. DANIEL from presiding over this case due to potential bias and Constitutional violations.

In support of this Motion, RAYMOND E. BUTLER states as follows:

1. RAYMOND E. BUTLER is a party to the above-captioned matter currently pending before the Honorable JEREMY C. DANIEL.
2. Pursuant to 28 U.S.C. § 455(a), a judge "shall disqualify himself in any

proceeding in which his impartiality might reasonably be questioned."

3. Additionally, 28 U.S.C. § 455(b)(1) requires disqualification where the judge "has a personal bias or prejudice concerning a party, or personal knowledge of disputed evidentiary facts concerning the proceeding."

4. Under 28 U.S.C. § 144, when a party files a timely and sufficient affidavit stating that the judge before whom the matter is pending has a personal bias or prejudice either against the party or in favor of an adverse party, "such judge shall proceed no further therein, but another judge shall be assigned to hear such proceeding."

5. RAYMOND E. BUTLER has filed a timely and sufficient affidavit, attached hereto as Exhibit A, stating the facts and reasons for the belief that bias or prejudice exists, as required.

6. The affidavit is accompanied by a certificate of counsel of record stating that it is made in good faith, as required by statute.

7. The specific facts demonstrating bias include Judge Daniel's extensive professional history that creates an appearance of partiality and potential personal knowledge of disputed facts central to this litigation.

8. Judge Daniel served as an attorney at Katten Muchin Rosenman LLP ("Katten") in Chicago, Illinois, from 2007 to 2013.

9. During this period, Katten, through its partner Charles Harris, drafted key trust instruments involving Defendants Chaim Rajchenbach, Rivka Rajchenbach, Avrum Rajchenbach, Menachem Shabat, Ahuva Shabat, and Ronald Shabat—false trusts that form the core of the disputed assets and property interests at issue in case 1:25-cv-4443 which gave rise to the instant case.

10. As detailed in the Declaration of Charles Harris (attached hereto as Exhibit B and dated March 28, 2025, filed in 1:25-cv-4443 ECF 199), Harris—a partner at Katten—personally drafted the Chaim Rajchenbach Descendants Trust, effective April 28, 2008, and an unknown attorney at Katten executed its subsequent name change to the GPN Family Trust U/A/D 4/28/08 on December 7, 2010.

11. Harris also drafted the Menachem Shabat Descendants Trust, effective January 3, 2012, and an unknown attorney at Katten executed its name changes to the Menachem and Ahuva Shabat Descendants Trust U/A/D 1/3/12 on January 9, 2015, and later to the Doros Generation Trust U/A/D 1/3/12 on October 31, 2017.

12. These documents were all prepared during Daniel's tenure as an attorney at Katten, coinciding directly with the firm's representation of these

Defendants in estate planning matters that underpin the asset freezes, property disputes, and fraudulent conveyance claims central to this action.

13. Daniel's role as an attorney at the firm during this timeframe raises a reasonable question of whether he possesses personal knowledge of these evidentiary facts or participated in related matters, creating an impermissible appearance of bias in favor of Defendants.

14. Public records confirm Daniel's employment at Katten from 2007 to 2013, including his work as an attorney in the firm's Chicago office.

15. This overlap with the drafting of the trusts implicates 28 U.S.C. § 455(b)(1), as Daniel likely had access to or knowledge of confidential client information concerning Defendants' assets, which are disputed in the underlying case 1:25-cv-04443.

16. Further compounding the bias, Judge Daniel served as an Assistant United States Attorney ("AUSA") in the U.S. Attorney's Office for the Northern District of Illinois from 2014 to 2023, overlapping significantly with the tenure of District Judge Georgia N. Alexakis, who served as an AUSA and Chief of Appeals for the Criminal Division in the same office from 2013 to 2021, and again from 2022 to 2024.

17. This nine-year professional overlap in the same U.S. Attorney's Office—where both prosecutors collaborated on high-stakes criminal matters,

including public corruption and fraud cases—fosters a close collegial relationship that reasonably questions Daniel's impartiality in a case involving similar factual and legal issues to those over which Alexakis has presided (Case No. 1:25-cv-04443).

18. Additionally, their joint appearances on judicial panels as recently as August 2025 further underscore this ongoing professional affinity. See Chicago IP Litigation Blog, "Meet the New Northern District Judges" (Aug. 20, 2025).

19. Judge Daniel's was nominated to the federal bench by President Joseph R. Biden on March 21, 2023, and confirmed by the Senate on June 1, 2023. While his nomination may reflect distinguished service, it occurs against the backdrop of Joe Biden's mental competence and autopen nomination concerns which is at the heart of the instant case.

20. Additionally, Judge Daniel's professional ties to Defendants in the underlying case, 1:25-cv-04443, and Judge Alexakis, amplify concerns of favoritism in a matter involving politically sensitive asset disputes and due process claims.

21. These actions and conduct demonstrate a bias that violates Plaintiff's right to due process under the Fourteenth Amendment to the United States Constitution, which prohibits any state from depriving "any person of life, liberty, or property, without due process of law."

23. The Code of Conduct for United States Judges, Canon 2, requires that judges "should avoid impropriety and the appearance of impropriety in all activities" and "act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary."

24. The Seventh Circuit has established standards for judicial recusal that support disqualification in circumstances such as those present in this case, including prior professional relationships that could imply bias. See, *Liteky v. United States*, 510 U.S. 540, 554 (1994) (recusal warranted for extrajudicial sources of bias); *Bauer v. Shepard*, 634 F. Supp. 2d 912, (7th Cir. 2009) (appearance of impartiality assessed objectively).

25. Compounding these concerns is the unusually expedited assignment of the instant case to this judge within mere hours of filing, deviating significantly from the standard administrative process that typically requires several days for random or rotational assignment, as supported by court procedural rules and historical data. This anomalous speed, when viewed in conjunction with the presiding judge's ties to the defendant, suggests potential non-random selection or influence, thereby undermining public confidence in the judiciary's neutrality and necessitating disqualification under 28 U.S.C. § 455(a) to preserve the integrity of the proceedings.

26. Based on the foregoing facts and applicable law, Judge JEREMY C.

DANIEL'S impartiality might reasonably be questioned, and recusal is therefore mandatory.

WHEREFORE, RAYMOND E. BUTLER, requests that this Honorable Court:

- a. Grant this Motion to Disqualify District Judge Jeremy C. Daniel from the above case;
- b. Order that Judge JEREMY C. DANIEL be disqualified from presiding over this case;
- c. Request that the Chief Judge of this District assign another judge to preside over this matter; and
- d. Grant such other and further relief as this Court deems just and proper.

Respectfully submitted,

/s/ 
Katherine A. London
Counsel for Plaintiff

Katherine A. London
Atty No.: 6345920
100 Illinois St. Suite 200
Saint Charles, IL 60174
630-507-9998
klondon@kmflaw.com

CERTIFICATE OF SERVICE

I hereby certify that on September 12, 2025, I served a true and correct copy of the foregoing Motion to Disqualify on all parties of record by electronic filing in accordance with Rule 5(b)(2) of the Federal Rules of Civil Procedure.

/s/



Katherine A. London
Counsel for Plaintiff

Katherine A. London
Atty No.: 6345920
100 Illinois St. Suite 200
Saint Charles, IL 60174
630-507-9998
klondon@kmflaw.com

EXHIBIT A

AFFIDAVIT OF RAYMOND E. BUTLER

I, RAYMOND E. BUTLER, II, being of legal age and competent to testify, after being first duly sworn according to law, depose and state as follows:

1. I am the Plaintiff in the above-captioned matter, which is currently pending before the Honorable Jeremy C. Daniel in the United States District Court for the Northern District of Illinois.
2. This Affidavit is submitted pursuant to 28 U.S.C. § 144 in support of my Motion to Disqualify Judge Jeremy C. Daniel from presiding over this case. I make this Affidavit based on my personal knowledge, information, and belief, and if called upon, I could and would competently testify thereto.
3. I believe that Judge Jeremy C. Daniel has a personal bias or prejudice against me, or in favor of the Defendants, or personal knowledge of disputed evidentiary facts concerning this proceeding, such that his impartiality might reasonably be questioned under 28 U.S.C. § 455. The facts supporting this belief are as follows:
4. Judge Daniel served as an associate attorney at Katten Muchin Rosenman LLP ("Katten") in Chicago, Illinois, from 2007 to 2013. During this exact period, Katten, through its partner Charles Harris, drafted and amended key trust instruments central to the disputed assets and property interests in this litigation, including trusts involving Defendants Chaim Rajchenbach, Rivka Rajchenbach, Avrum Rajchenbach, Menachem Shabat, Ahuva Shabat, and Ronald Shabat.
5. As detailed in the Declaration of Charles Harris, dated March 28, 2025 (Exhibit B), Mr. Harris personally drafted: (a) the Chaim Rajchenbach Descendants Trust, effective April 28, 2008, and another Katten attorney executed its name change to the GPN Family Trust U/A/D 4/28/08 on December 7, 2010; and (b) the Menachem Shabat Descendants Trust, effective January 3, 2012, and another Katten attorney executed its subsequent name changes to the Menachem and Ahuva Shabat Descendants Trust U/A/D 1/3/12 on January 9, 2015, and to the Doros Generation Trust U/A/D 1/3/12 on October 31, 2017.
6. These trusts form the core of the asset freezes, property disputes, and fraudulent conveyance claims at issue in this case. The drafting of these instruments in 2008, 2010, and 2012 directly coincides with Judge Daniel's tenure as an associate at Katten, raising a reasonable concern that he may possess personal knowledge of these disputed evidentiary facts or have been involved in related matters at the firm, thereby creating an appearance of bias in favor of the Defendants under 28 U.S.C. § 455(b)(1).

7. Further, Judge Daniel served as an Assistant United States Attorney ("AUSA") in the U.S. Attorney's Office for the Northern District of Illinois from 2014 to 2023. This period overlaps substantially—for approximately nine years—with the service of U.S. District Judge Georgia N. Alexakis, who was an AUSA in the same office from 2013 to 2021 and again from 2022 to 2024, including as Chief of Appeals for the Criminal Division.

8. Their shared professional environment in high-stakes criminal prosecutions, including fraud and public corruption cases, suggests a close collegial relationship that reasonably questions Judge Daniel's impartiality in this matter, particularly given Judge Alexakis' prior involvement in the related federal case (No. 1:25-cv-04443) involving similar due process and asset dispute issues. This concern is amplified by their recent joint appearance on a judicial panel on August 20, 2025, titled "Meet the New Northern District Judges," which underscores their ongoing professional affinity.

9. Additionally, Judge Daniel was nominated to the federal bench by President Joseph R. Biden on March 21, 2023, and confirmed by the U.S. Senate on May 17, 2023. While his nomination reflects distinguished service, it occurs in the context of concerns regarding Joe Bidens mental acuity and alleged illegal autopen nominations as well as professional ties to the Defendants in the underlying case, :25-cv-04443 (via Katten) and to Judge Alexakis, heightening concerns of potential favoritism in a politically sensitive case involving asset disputes and constitutional claims.

10. The foregoing facts demonstrate a pattern that violates my right to due process under the Fourteenth Amendment to the United States Constitution by creating an impermissible appearance of partiality. These circumstances mirror the disparate treatment and favoritism alleged in the related proceedings before Judge Alexakis.

11. I believe these facts are sufficient to require Judge Daniel's disqualification to avoid impropriety and promote public confidence in the judiciary, as required by the Code of Conduct for United States Judges, Canon 2.

12. This Affidavit is made in good faith and not for purposes of delay.

FURTHER AFFIANT SAYETH NOT.

/s/ 
RAYMOND E. BUTLER, II

Dated: September 12, 2025

EXHIBIT B

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

RAYMOND E. BUTLER II)
Plaintiff,) Case No. 2022 CH 675
v.) The Honorable Allen P. Walker
ILLANA EDDI AND ELY EDDI, individually)
and as Trustees of the Jack Finn Irrevocable Trust,)
Defendants.)

DECLARATION OF CHARLES HARRIS

I, Charles Harris, hereby certify, under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure:

1. The facts set forth in this declaration are within my personal knowledge, and if called upon, I would and could competently testify thereto.
2. I am a partner at Katten Muchin Rosenman LLP, and I have represented the Rajchenbach family for over 25 years and the Shabat family for over 13 years.
3. I drafted the Chaim Rajchenbach Descendants Trust which became effective on April 28, 2008. On December 7, 2010 the Chaim Rajchenbach Descendants Trust changed its name to the GPN Family Trust U/A/D 4/28/08. That name change document was also drafted by Katten.
4. I drafted the Menachem Shabat Descendants Trust which became effective on January 3, 2012. On January 9, 2015 the Menachem Shabat Descendants Trust U/A/D 1/3/12 changed its name to the Menachem and Ahuva Shabat Descendants Trust U/A/D 1/3/12. That name change document was drafted by Katten. On October 31, 2017 the Menachem and Ahuva

Shabat Descendants Trust U/A/D 1/3/12 changed its name to the Doros Generation Trust U/A/D 1/3/12. That name change document was also drafted by Katten.

5. Neither the GPN Family Trust nor the Doros Generation Trust was created by Jonas Neufeld or for the benefit of Jonas Neufeld or any of his family members.

6. Neither the GPN Family Trust nor the Doros Generation Trust were created for the benefit of Raymond Butler II or any of his family members.

7. Raymond Butler II is not and never was a beneficiary of the GPN Family Trust or the Doros Generation Trust.

8. Neither Jack Finn nor any of the trusts he has established has ever served as a Trustee of the GPN Family Trust or the Doros Generation Trust.

Under penalties of perjury pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in the foregoing declaration 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 believes the same to be true.

Dated: March 28, 2025



Charles Harris, Partner
Katten Muchin Rosenman LLP
525 W. Monroe Street
Chicago, Illinois 60661