

STATE OF ILLINOIS
DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION
DIVISION OF PROFESSIONAL REGULATION

DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION
OF THE State OF Illinois,)
Complainant)
)
v.) No. 200909683
)
Bridget Demerro Marshall)
License No. 034016209, Respondent)

SECOND AMENDED COMPLAINT

Now comes the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois, by its Acting Chief of Business Prosecutions, Bill Laskaris, and as its SECOND AMENDED COMPLAINT against Bridget Demerro Marshall, Respondent, complains as follows:

COUNT I

1. Respondent, Bridget Demerro Marshall, is presently the holder of a Certificate of Registration to practice as a Funeral Director and Embalmer in the State of Illinois, License No. 034016209 issued by the Department of Financial and Professional Regulation of the State of Illinois "Department". Said license is in active status.

2. At all times pertinent to this Complaint, the Respondent offers and provides, or in the past did offer funeral and embalming services within the State of Illinois.

3. That Respondent supervises Mr. Terrence Marshall at the Unique Funeral Home.

4. That Mr. Terrence Marshall does not hold a funeral director license in the State of Illinois.

5. That Mr. Terrence Marshall does not hold a funeral director or embalmer intern license in the State of Illinois.

6. That on or about June 22, 2009, Ms. LB presented to Unique Funeral Chapel to provide funeral services for her daughter Ms. JRB.

7. That Ms. LB chose Mt. Hope Cemetery in order to facilitate a Public Aid burial.

8. That Respondent, licensee 034016209, informed Ms. LB that a Public Aid burial site would have two persons buried on one grave site instead of one person for the grave site.

9. That Respondent, licensee 034016209, informed Ms. LB that a single grave site may be purchased as an upgrade.

10. That Respondent allowed Mr. Terrence Marshall to discuss a possible single grave site upgrade with the family of the decedent.

11. That Respondent sent Mr. Terrence Marshall to the home of Ms. LB to discuss the single grave site upgrade for the decedent and other financial arrangements

for the funeral.

12. That Respondent allowed Mr. Terrence Marshall to engage in the unlicensed practice of funeral directing and embalming as defined in the Funeral Directors and Embalmers Licensing Code.

13. That Respondent's foregoing acts and/or omissions constitute unethical or unprofessional conduct of a character likely to deceive, defraud or harm the public and are grounds for the Department to suspend, revoke or otherwise discipline her certificate of registration pursuant to 225 ILCS (2006), Section 41/15-75(b)(19).

WHEREFORE, based on the foregoing allegations, the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois, by Bill Laskaris, Acting Chief of Business Prosecutions, prays that the license of Bridget Demerro Marshall to practice as a Funeral Director and Embalmer in the State of Illinois be suspended, revoked or otherwise disciplined.

COUNT II

1-12. The Department adopts and realleges paragraphs 1 through 12 of Count I of this Second Amended Complaint as paragraphs 1 through 12 of Count II.

13. That Respondent's foregoing acts and/or omissions constitute performing any act or practice that is a

violation of the Funeral Directors Licensing Code "Code", the rules for the administration of the Code, any federal, State or local laws, rules, or regulations governing the practice of funeral directing or embalming and are grounds for the Department to suspend, revoke or otherwise discipline her certificate of registration pursuant to 225 ILCS (2006), Section 41/15-75(b)(17).

WHEREFORE, based on the foregoing allegations, the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois, by Bill Laskaris, Acting Chief of Business Prosecutions, prays that the license of Bridget Demerro Marshall to practice as a Funeral Director and Embalmer in the State of Illinois be suspended, revoked or otherwise disciplined.

DEPARTMENT OF FINANCIAL AND
PROFESSIONAL REGULATION, DIVISION
OF PROFESSIONAL REGULATION
of the State of Illinois

By: _____
Bill Laskaris
Acting Chief of Business Prosecutions

Attorney for the Department of
Financial and Professional
Regulation of the State of Illinois
100 West Randolph St., Suite 9-300
Chicago, IL 60601
(312) 814-5902