

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

In the Matter of:

MAHDIS AZIMI,

Attorney-Respondent,

No. 6320242.

Commission No. 2021PR00017

COMPLAINT

Jerome Larkin, Administrator of the Attorney Registration and Disciplinary Commission, by his attorney, Rachel C. Miller, pursuant to Supreme Court Rule 753(b), complains of Respondent, Mahdis Azimi ("Respondent"), who was licensed to practice law in Illinois on November 5, 2015, and alleges that Respondent has engaged in the following conduct which subjects her to discipline pursuant to Supreme Court Rule 770:

COUNT I

*(Failure to diligently represent a client and
making false representations to a client)*

1. Between August 2016 and March 18, 2018, Anish Parikh ("Parikh"), owner of Parikh Law Group, employed Respondent as an associate attorney. Respondent's practice consisted primarily of immigration matters.

2. Prior to May 12, 2017, Gaby Abboud ("Abboud"), a Chicago-based photographer, took photographs of attorneys in the Parikh Law Group for the firm's website. Shortly after taking the photographs, Parikh directed Respondent to contact Abboud to discuss an immigration matter.

3. On May 12, 2017, Respondent and Abboud discussed a lawful permanent resident ("green card") application for Abboud's fiancée, Michelle Obeid ("Obeid"), including Obeid

entering the United States on a non-immigrant visitor visa (“visitor visa”) and then filing for an adjustment of status from visitor visa to a green card. Respondent advised that the adjustment of status process allowed for an application to be submitted and processed without the applicant returning to her home country to await visa processing.

4. In July 2017, Obeid entered the United States on a visitor visa. Subsequently, Respondent met with Obeid to discuss submitting a one-step adjustment of status application to amend her visitor visa to a green card after Obeid and Abboud married.

5. On October 14, 2017, Abboud and Obeid married.

6. On November 2, 2017, Abboud hired the Parikh Law Firm to represent Obeid in submitting the one-step adjustment of status application for a green card. Parikh Law Firm and Abboud did not have a written retainer agreement. However, Abboud paid Parikh Law Firm the agreed upon fee of \$1,760 and Parikh assigned Respondent to the matter.

7. On November 8, 2017, Obeid emailed Respondent to check on the status of the application and ask a question about obtaining state identification.

8. On November 9, 2017, Respondent emailed Obeid and stated, “I did file the papers and haven’t received a receipt yet but will let you know once I do.”

9. Respondent’s representation in paragraph eight was false, because she had not filed the application.

10. Respondent knew at the time she made the representation in paragraph eight that it was false.

11. On February 28, 2018, Obeid received a notice from the United States Department of Homeland Security stating that she was required to appear for a meeting on March 13, 2018 regarding an I-94 update inquiry, which indicated an overstay on a visitor visa.

12. After receiving the notice, Abboud and Obeid contacted Respondent. Respondent stated that she had filed the one-step adjustment of status application for a green card.

13. Respondent's representation in paragraph 12 was false, because she had not filed the one-step adjustment of status application for a green card.

14. Respondent knew at the time she made the representation in paragraph 12 that it was false.

15. By reason of the conduct described above, Respondent has engaged in the following misconduct:

- a. failing to act with reasonable diligence and promptness in representing a client, by conduct including Respondent's failure to file a one-step adjustment of status for a green card in a timely manner, in violation of Rule 1.3 of the Illinois Rules of Professional Conduct (2010); and
- b. engaging in conduct involving dishonesty, fraud, deceit or misrepresentation, by conduct including knowingly making the false statements described in paragraphs 8 and 12, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

COUNT II

(Fabricating false documents and providing them to a client)

16. The Administrator realleges the allegations contained in paragraphs one through 14 above.

17. Between November 8, 2017 and February 28, 2018, Abboud and Obeid contacted Respondent by telephone and email to inquire about the status of the application.

18. On February 28, 2018, after receiving the notice from the United States Department of Homeland Security stating that Obeid was required to appear for a meeting on March 13, 2018 regarding an I-94 update inquiry, Obeid and Abboud contacted Respondent. Obeid and Abboud told Respondent that they wanted her to attend the meeting on their behalf.

19. On March 14, Respondent called Abboud and Obeid and stated that she appeared for the meeting with the United States Department of Homeland Security on Obeid's behalf and the meeting had been re-set to March 16, 2018 in order for Obeid to appear.

20. On or before March 14, 2018, Respondent fabricated an email purportedly sent to Respondent on February 20, 2018 at 2:54 p.m. from Pauline Woodson ("Woodson"), Adjudications Branch Chief of United States Citizenship and Immigration Services (USCIS). Woodson's purported email to Respondent stated:

"Good Afternoon,

Thank you for your inquiry. We have reviewed the case file and, based on this, have requested that a new receipt be sent to Applicant and Attorney of Record.

Thank you,
Pauline Woodson"

21. On March 14, 2018, Respondent sent the fabricated email described in paragraph 20 to Abboud and Obeid.

22. Respondent's representation to Abboud and Obeid that she received the email described in a paragraph 20 was false, because she fabricated it specifically to send to Obeid and Abboud.

23. At the time Respondent sent the email described in paragraph 20 to Abboud and Obeid, Respondent knew that the email was false.

24. On or before March 15, 2018, Respondent fabricated an email purportedly sent to Respondent on December 19, 2017 at 2:54 p.m. from an individual identified as Melissa of The Lockbox Support Team of USCIS. Melissa's purported email to Respondent stated:

"Good Afternoon,

Thank you for your inquiry. We have reviewed the case file and can tell you that the case has been “fee’d” in.

Thank you,

Melissa
The Lockbox Support Team
U.S. Citizenship and Immigration Services”

25. On March 15, 2018, Respondent sent the email described in paragraph 24 to Parikh, Obeid, and Abboud.

26. Respondent’s representation to Abboud and Obeid that she received the email described in a paragraph 24 was false, because she did not receive the email from Melissa and fabricated it specifically to send to Obeid and Abboud.

27. At the time Respondent sent the email described in paragraph 24 to Abboud and Obeid, Respondent knew that the email was false.

28. By reason of the conduct described above, Respondent has engaged in the following misconduct:

- a. engaging in conduct involving dishonesty, fraud, deceit or misrepresentation, by conduct including knowingly fabricating and sending the false email described in paragraph 20 to Abboud and Obeid and knowingly fabricating and sending the false email described in paragraph 24 to Parikh, Abboud, and Obeid, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

WHEREFORE, the Administrator respectfully requests that this matter be assigned to the panel of the Hearing Board, that a hearing be held, and that the panel make findings of fact, conclusions of fact and law, and a recommendation for such discipline as is warranted.

Respectfully submitted,

Jerome Larkin, Administrator
Attorney Registration and
Disciplinary Commission

By: /s/ Rachel C. Miller
Rachel C. Miller

Rachel C. Miller
Counsel for the Administrator
3161 West White Oaks Drive, Suite 301
Springfield, Illinois 62704
Telephone: (217) 546-3523
Email: ARDCeService@iadc.org
Email: rmiller@iadc.org
MAINLIB-#1345761