

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

FILED
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ARDC Clerk

In the Matter of:

WILLIAM MICHAEL DOYLE, JR. ,

Attorney-Respondent,

No. 672823.

Commission No. 2025PR00015

COMPLAINT

Lea S. Gutierrez, Administrator of the Attorney Registration and Disciplinary Commission, by her attorneys, Scott Renfroe and Richard Gleason, pursuant to Supreme Court Rule 753(b), complains of Respondent, William Michael Doyle, Jr., who was licensed to practice law in the State of Illinois on October 12, 1976, and alleges that Respondent has engaged in the following conduct that subjects him to discipline pursuant to Supreme Court Rule 770:

Background

1. Between 2002 and 2024, Respondent worked as an attorney in the Chicago offices of two large international law firms. Respondent worked as an equity partner at the first of those two firms (“Firm A”) from approximately 2002 to 2022, where he concentrated his practice in providing legal services to wealthy individuals and their trusts and estates. In August 2022, Respondent joined the second firm (“Firm B”) as a shareholder, where he continued to provide the same or similar legal services to the same or similar individuals and trusts and estates as he provided at Firm A. As an equity partner in Firm A and as a shareholder in Firm B, Respondent shared in each firm’s profits and losses.

2. As an attorney at both Firm A and Firm B, Respondent was ultimately responsible for decisions affecting the clients he brought to the firm, including the clients described in paragraphs six and seven, below (“Respondent’s clients” and “his clients”). As the attorney who was ultimately responsible for the decisions affecting his clients, Respondent decided which firm

attorneys would be assigned tasks and would provide services related to each client matter, as well as to how much he and the firm attorneys to whom he assigned tasks would charge his clients.

3. During Respondent's tenure at both firms, Respondent directed other firm attorneys and staff to perform various tasks in service to his clients. Every month, at Respondent's direction, those firm attorneys and staff prepared records of the time they expended and the services they provided for Respondent's clients. Those records identified the attorney or other staff member who performed the work, contained descriptions of the work performed by those individuals, listed the time spent by those individuals for the described work, and stated the hourly rate charged by each of those individuals. Respondent was responsible for reviewing those records to ensure they accurately reflected what services were provided and who provided those services, and for then approving their submission to the firm's accounting departments for a final bill to be generated. The firm then issued monthly bills to Respondent's clients based on the records Respondent approved.

4. Between at least 2004 and 2024, Respondent falsified the billing records pertaining to his clients at both firms so that his clients were billed for services the firm did not provide those clients, or billed for time that, by the firms' customs and practices, should have been written off because, for example, the individual who recorded the time worked inefficiently or provided services that should not have been charged to clients for other reasons. Respondent falsified the billing records by mischaracterizing time originally recorded by firm employees who actually performed the work for a client as ~~the~~ time spent in service to another client. In other instances, Respondent artificially inflated the number of hours a firm employee worked on a client matter. In either case, Respondent's mischaracterizations of billing records caused the firm to send artificially inflated invoices to Respondent's clients.

5. The billing records described in paragraph five, above, and paragraphs seven and eight, below, purported to charge Respondent’s clients for services which Respondent and other firm attorneys actually provided to those clients. The billing records were false because they charged Respondent’s clients for time and services that were not, in fact, provided to those clients. Respondent knew the billing statements were false because he reviewed, altered, and then approved and submitted them to the firm. Respondent further knew the invoices sent by the firm to his client would be based on the billing records he approved each month for that client.

(Dishonestly in Billing-Firm A)

6. Between approximately April 12, 2004, and August 14, 2022, Respondent mischaracterized time originally recorded by Firm A attorneys having a value of more than \$2.5 million. The 17 clients who received those invoices, listed below in a manner that does not disclose their identities, later paid the amounts listed in the invoices, including making payments for purported legal services that Respondent knew had not been performed for those clients’ benefit.

A list of the amounts charged to the clients for work not done on their behalf follows:

<u>Firm A Client Being Charged</u>	<u>Date Range of Transfers</u>	<u>Total Unrelated Billed Amount</u>
A	9/19/05-8/3/22	\$997,987.07
B	8/9/18-8/14/22	\$406,644.29
C	3/4/19-10/29/21	\$290,183.16
D	2/1/18-5/24/22	\$282,794.74
E	8/9/18-12/30/21	\$212,760.75
F	9/1/20-8/8/22	\$160,534.98
G	3/29/19-5/18/22	\$63,336.32
H	10/21/19-5/24/22	\$40,390.53
I	4/24/18-5/15/18	\$21,937.50
J	11/26/18-1/8/21	\$16,701.44
K	4/12/04-5/11/21	\$12,298.75
L	4/2/20-5/11/20	\$6,624.95
M	8/31/21-9/15/21	\$6,357.50
N	4/15/20-5/28/20	\$5,016.00

O	7/14/06-9/18/20	\$2,056.25
P	8/10/22	\$2,048.00
Q	8/4/22-8/9/22	\$1,706.67
TOTAL		\$2,529,378.90

(Dishonestly in Billing- Firm B)

7. Between approximately August 2022 and April 2024, Respondent mischaracterized time originally recorded by Firm B attorneys having a value of more than \$970,000. The 10 clients who received those invoices, listed below in a manner that does not disclose their identities, later paid the amounts listed in the invoices, including making payments for purported legal services that Respondent knew had not been performed for those clients' benefit. A list of the amounts charged to the clients for work not done on their behalf follows:

<u>Firm B Client Being Charged</u>	<u>Total Unrelated Billed Hours</u>	<u>Total Unrelated Billed Amount</u>
A	170.46	\$123,793.05
B	175.40	\$140,990.75
C	444.70	\$354,709.05
D	119.60	\$75,597.40
E	103.50	\$84,689.50
F	87.90	\$61,514.95
G	52.70	\$33,641.75
H	26.20	\$18,442.00
I	76.60	\$68,317.15
J	<u>13</u>	<u>\$12,214.50</u>
TOTAL	1,270.06	\$973,910.10

8. After learning of Respondent's mischaracterization of time on invoices sent to clients, both Firm A and Firm B conducted reviews of the client invoices Respondent sent to the affected clients and offered to refund the amounts that were billed based upon false information about which timekeepers provided the services for which the clients were billed. Some, but not all, of the clients agreed to accept the refunds offered by the firms.

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

- a. conduct involving dishonesty, fraud, deceit or misrepresentation, by conduct including preparing pre-bills misrepresenting his own and other firm employees' staff time on the billing records he sent to the billing departments at Firms A and B, leading to the creation of fraudulent invoices by Firms' A and B billing departments, in violation of Rule 8.4(a)(4) of the Illinois Rules of Professional Conduct.

WHEREFORE, the Administrator requests that this matter be assigned to a 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,

Lea S. Gutierrez, Administrator
Attorney Registration and
Disciplinary Commission

By: /s/ Scott Renfroe
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