

051186/06088/JAH

Firm ID No. 44613

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

In the Matter of:

MAHDIS AZIMI,
Attorney-Respondent,
No. 6320242.

Commission No. 2023PR00003

NOTICE OF FILING

TO: Rachel Miller (MMiller@iadc.org)
Counsel – ARDC Litigation Division
Attorney Registration and Disciplinary Commission
3161 West White Oaks Drive, Suite 301
Springfield, IL 62704

PLEASE TAKE NOTICE that on May 5, 2023 we filed Answer to Complaint with the Illinois Attorney Registration and Disciplinary Commission.

Respectfully submitted,

CASSIDAY SCHADE LLP

By: /s/ Jeffrey A. Hesser
One of the Attorneys for Attorney-Respondent,
Mahdis Azimi

Jeffrey A. Hesser
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FILED
5/5/2023 12:39 PM
ARDC Clerk

CERTIFICATE OF SERVICE VIA EMAIL

Deitrist Jackson, being first duly sworn upon oath deposes and states that a true and correct copy of the foregoing document was served via email to the named attorneys of record at their respective email addresses, above, by emailing the same before the hour of 5:00 p.m., on May 5, 2023. Under penalties as provided by law pursuant to 735 ILCS 5/1-109, I certify that the statements set forth herein are true and correct.

/s/ Deitrist Jackson _____

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IN THE MATTER OF MAHDIS AZIMI

SERVICE LIST

Rachel Miller
Attorney Registration Disciplinary Commission
130 E. Randolph Dr.
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In the Matter of:

MAHDIS AZIMI,
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ANSWER TO COMPLAINT

NOW COMES the Attorney-Respondent, Mahdis Azimi, by and through her attorneys CASSIDAY SCHADE LLP, and in answer to the Complaint filed before the Hearing Board of the Illinois Attorney Registration and Disciplinary Commission, states as follows:

COUNT I

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

1. At all times related to this complaint, Respondent operated as a sole practitioner of Azimi Law LLC. She maintains an office in Chicago, and she concentrates her practice in the area of immigration law.

ANSWER: Attorney-Respondent admits the allegations contained in Paragraph 1 of the Complaint.

2. Prior to May 2019, Heartland Alliance, a non-profit advocacy organization based in Chicago, filed a petition for alien fiancé(e), also known as an I-129F application, on behalf of Nageswar Linga (“Linga”) and his fiancée, Swarnlata Damor (“Damor”). At that time, Damor lived in India.

ANSWER: Attorney-Respondent admits the allegations contained in Paragraph 2 of the Complaint.

3. Between May 2019 and November 2019, Respondent worked as a volunteer attorney at Heartland Alliance through its National Immigration Justice Center program, and the organization assigned her to assist Linga and Damor in the next steps in Damor’s immigration process, including preparing a consular application and preparing for an immigration interview. Respondent prepared the consular application and prepared Linga and Damor for the immigration interview.

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ANSWER: Attorney-Respondent denies that she was a "volunteer attorney at Heartland Alliance through its National Immigration Justice Center program." Azimi was an attorney with the Justice Entrepreneur's Project ("JEP"), and JEP partnered with Heartland Alliance so that Azimi would work on Heartland Alliance matters while a JEP attorney, which included working with the National Immigrant Justice Center. Further answering, Attorney-Respondent admits the remaining allegations in Paragraph 3 of the Complaint.

4. When Respondent's volunteer placement ended in November 2019, she provided her contact information to Linga in case he decided to retain her for additional legal services in the future.

ANSWER: Attorney-Respondent admits the allegations contained in Paragraph 4 of the Complaint.

5. On February 8, 2020, Damor entered the United States on a K-1 visa, which is also known as a "fiancé(e) visa."

ANSWER: Upon information and belief, Attorney-Respondent admits the allegations contained in Paragraph 5 of the Complaint.

6. On February 15, 2020, Linga and Damor married.

ANSWER: Upon information and belief, Attorney-Respondent admits the allegations contained in Paragraph 6 of the Complaint.

7. In March 2020, Linga contacted Respondent to discuss filing an I-485 application in order to adjust Damor's immigration status from a fiancée visa to a lawful permanent resident visa ("green card"). Respondent and Linga agreed that Linga would pay Respondent a flat fee of \$1,500 in exchange for representation in preparing and filing the I-485 application. Respondent and Linga also agreed that Linga would pay Respondent \$1,250 for the filing fee. Linga paid Respondent a total of \$2,750 for the retainer and the filing fee.

ANSWER: Attorney-Respondent admits that in March 2020, Linga contacted her to discuss filing an I-485 application in order to adjust Damor's immigration status from that of a fiancée visa to lawful permanent resident status. Further answering, Attorney-Respondent admits that Linga and Damor agreed to pay her a flat fee of \$1,500, which was to cover her fees for the preparation and filing of the I-485 application, along with an I-131 application, an I-765 application, and an I-864 application. Attorney-Respondent further admits that Linga paid a filing fee of \$1,225 for the filing of the I-485 application. Attorney-Respondent denies that she was paid a retainer but admits Linga paid her \$2,725 for the flat fee representation and the filing fee for the I-485 application.

8. On March 10, 2020, Respondent, Linga and Damor met to prepare the I-485 application, as well as an I-131 application in order to obtain travel documents for Damor to leave the country. Respondent subsequently submitted the I-485 application and the I-131 application in June 2020 to United States Citizenship and Immigration Services ("USCIS").

ANSWER: Attorney-Respondent admits the allegations contained in Paragraph 8 of the Complaint.

9. Shortly after Respondent filed the applications, Linga told Respondent that Damor needed to return to India. Respondent informed Linga that an applicant generally may not leave the United States while an I-485 application is pending without first obtaining advance parole with an I-131 application. At that time, USCIS had not granted Damor's I-131 application.

ANSWER: Attorney-Respondent lacks sufficient information to admit or deny the allegations contained in Paragraph 9 of the Complaint with respect to when Linga told Attorney-Respondent this information as alleged. Further answering, Attorney-Respondent admits the remaining allegations contained in Paragraph 9 of the Complaint.

10. On June 12, 2020, Damor returned to India.

ANSWER: Attorney-Respondent lacks sufficient information to admit or deny the allegations contained in Paragraph 10 of the Complaint.

11. [sic] No allegations are included in the Complaint as Paragraph 11 and thus no answer is required by Attorney-Respondent.

12. After Damor left the United States, Respondent and Linga discussed the option of applying for a humanitarian parole for Damor.

ANSWER: Attorney-Respondent admits the allegations contained in Paragraph 12 of the Complaint.

13. In June 2021, Respondent and Linga agreed that Linga would pay Respondent a flat fee of \$1,500 to file a humanitarian parole application and also pay Respondent \$575 for the filing fee. Linga paid Respondent a total of \$2,075.

ANSWER: Upon information and belief, Attorney-Respondent admits the allegations contained in Paragraph 13 of the Complaint.

14. In June 2021, Respondent began preparing the humanitarian parole application for Damor, but she did not file the application.

ANSWER: Attorney-Respondent admits the allegations contained in Paragraph 14 of the Complaint.

15. On July 21, 2021, USCIS notified Damor that her I-485 application had been deemed abandoned due to her departure from the United States without prior approval of her I-131 application.

ANSWER: Attorney-Respondent admits the allegations contained in Paragraph 15 of the Complaint.

16. Between September 22, 2021 and November 1, 2021, Linga requested periodically requested that Respondent provide him with a copy of the application for humanitarian parole that she filed.

ANSWER: Attorney-Respondent admits that at certain times between September 22, 2021 and November 1, 2021, Linga requested a copy of the application for humanitarian parole.

17. [sic] No allegations are included in the Complaint as Paragraph 17 and thus no answer is required by Attorney-Respondent.

18. On September 28, 2021, Respondent sent Linga a text message and stated, “Hi, sir. I’m well, how are you? I haven’t forgotten. I’m not in the office but when I get back I will send you a copy.”

ANSWER: Attorney-Respondent admits the allegations contained in Paragraph 18 of the Complaint.

19. On October 14, 2021, Respondent sent Linga a text message and stated:

“I’m on a call. I got your message- I am on a call right now. I’m sorry if you are frustrated but I have been ill and not working as much in the office so when I go in today/tomorrow I will scan it in and send it to you. I appreciate your patience, just as I was patient with you.”

ANSWER: Attorney-Respondent admits the allegations contained in Paragraph 19 of the Complaint.

20. On November 1, 2021, Respondent send Linga a text message and stated, “Once we get a receipt number, I will put in an expedite [sic] request.”

ANSWER: Attorney-Respondent admits the allegations contained in Paragraph 20 of the Complaint.

21. Respondent’s representations in paragraphs 18, 19, and 20 were false, because she had not filed the humanitarian parole application.

ANSWER: Attorney-Respondent admits she had not filed the humanitarian parole application.

22. Respondent knew at the time she made the representations in paragraphs 18, 19, and 20 that they were false.

ANSWER: Attorney-Respondent admits the allegations contained in Paragraph 22 of the Complaint.

23. 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 humanitarian parole application, 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 18, 19, and 20, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

ANSWER: Attorney-Respondent admits she did not file a humanitarian parole application and admits making the false statements as described herein. Attorney-Respondent denies any remaining allegations contained in Paragraph 23 of the Complaint, including subparagraphs a and b, and each of them, as contained in Paragraph 23 of the Complaint.

Respectfully submitted,

CASSIDAY SCHADE LLP

By: /s/ Jeffrey A. Hesser
One of the Attorneys for Attorney-Respondent,
Mahdis Azimi

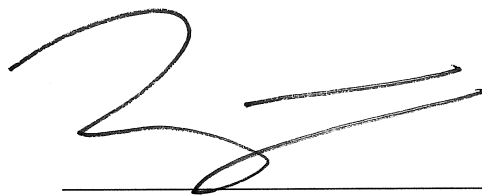
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AFFIDAVIT

I, Mahdis Azimi, the Attorney-Respondent, being under oath, hereby state pursuant to Illinois Code of Civil Procedure, Section 5/2-610(b) that the Attorney-Respondent lacks sufficient knowledge to form a belief as to the truth of the allegations contained in those Paragraphs of the Answer to the Complaint answered by the Attorney-Respondent having lack of sufficient knowledge as set forth in that Answer. I further state that the statements made in the foregoing Answer as to lack of sufficient knowledge to form a belief are true and correct. Under penalty of perjury and penalties as provided pursuant to 735 ILCS 5/1-109, I certify that the statements set forth herein are true and correct, except as to matters therein stated to be on information and belief and as to such matters I certify as aforesaid that I verily believe the same to be true.

Dated: May 1, 2023



Mahdis Azimi, Attorney-Respondent