

BEFORE THE HEARING BOARD
OF THE
ILLINOIS ATTORNEY REGISTRATION
AND
DISCIPLINARY

In the Matter of:

KENESE LASHEA DOWDY,

Attorney-Respondent,

No. 6328469.

Commission No. 2023PR00025

NOTICE OF FILING

TO: Rory P. Quinn
Counsel for the Administrator
rquinn@iadc.org
ARDCeService@iadc.org

PLEASE TAKE NOTICE that on June 13, 2023, I filed **Respondent's Answer to the Complaint** with the Clerk of the Attorney Registration and Disciplinary Commission, a copy of which is herewith served upon you.

BY: /s/ Mary Robinson

Mary Robinson

Mary Robinson
Robinson, Stewart, Montgomery & Doppke LLC
33 North Dearborn Street, Suite 1420
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FILED
6/13/2023 3:58 PM
ARDC Clerk

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies, pursuant to the Illinois Code of Civil Procedure, 735 ILCS 5/109, that she served a copy of **Respondent's Answer to the Complaint** on the individual(s) on the forgoing Notice of Filing, by causing it to be emailed to the email addresses listed above on June 13, 2023, at or before 5:00 p.m.

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument 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 she verily believes the same to be true.

/s/ Mary Robinson
Mary Robinson

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RESPONDENT'S ANSWER TO THE COMPLAINT

Now comes the Respondent, Kenese Lashea Dowdy, by her attorney, Mary Robinson, of Robinson, Stewart, Montgomery & Doppke LLC, and states, as and for her answer to the Administrator's Complaint:

ANSWER

1. At all times alleged in this complaint, Respondent was a sole practitioner and sole owner of a law firm in Chicago styled as The Dowdy Law Firm, and practiced primarily in the area of family law.

ANSWER: Admit, stating further that family law was primary to the extent that it constituted about half of Respondent's cases, with criminal law, real estate, and miscellaneous civil litigation constituting another half.

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2. At all times alleged in this complaint, Supreme Court Rule 794 required every attorney admitted to practice law in Illinois to complete certain minimum continuing legal education (“MCLE”) requirements, except as provided by Supreme Court Rules 791 or 793.

ANSWER: Admit.

3. At all times alleged in this complaint, Supreme Court Rule 796 required that all Illinois attorneys certify that they had complied with Rule 794 to the Minimum Continuing Legal Education Board (“MCLE Board”). The rule also required the Administrator, after being informed of an attorney’s failure to comply, to send notice to any attorney not in compliance with the rule informing them that their name would be removed from the roll of licensed attorneys in Illinois on a date no sooner than 21 days from the date of the notice if the attorney did not comply with the rule.

ANSWER: Admit.

4. At all times alleged in this complaint, Supreme Court Rule 756(a) required that, on or before the first day of January of each year, attorneys admitted to practice law in Illinois, subject to certain exceptions not applicable to Respondent, register and pay to the Attorney Registration and Disciplinary Commission (“ARDC”), any registration fee due according to the provisions of the Rule.

ANSWER: Admit.

5. At all times alleged in this complaint, Supreme Court Rule 756(h) provided that the Administrator, on or after February 1 of each year, shall remove from the master roll of attorneys authorized to practice law in Illinois the name of any attorney who has not registered for that year as required by Supreme Court Rule 756(a). Rule 756(h) further stated that any person whose name

is not on the master roll and who practices law or holds himself out as being authorized to practice law in Illinois has engaged in the unauthorized practice of law.

ANSWER: Admit.

6. As of September 27, 2019, Respondent had not completed or reported her completion of MCLE credit hours to the MCLE board, for the reporting period ending on June 30, 2019, as required by Supreme Court Rules 794 and 796, respectively. The MCLE board advised the Administrator of Respondent's failure to comply with the MCLE requirements.

ANSWER: Admit.

7. On or about September 27, 2019, the Administrator sent a letter to Respondent providing notice to her that the deadline to comply with MCLE requirements was October 25, 2019, and that her name would be subject to removal from the master roll of attorneys authorized to practice law in Illinois if she did not comply by that date. Respondent received the notice shortly after it was sent.

ANSWER: Respondent has no personal knowledge of actions taken by the Administrator. Respondent does not recall if or when she received the letter described.

8. As of February 21, 2020, Respondent had not registered as required by Supreme Court Rule 756(a).

ANSWER: Admit.

9. As of May 18, 2020, Respondent had not complied with her MCLE requirements, and on that date, the Administrator removed Respondent's name the roll of attorneys licensed to practice law in Illinois for failure to comply with Supreme Court Rules 794 and 796. Notice of her removal from the roll was sent to Respondent on that date, and Respondent received the notice shortly thereafter. In the notice of removal, Respondent was advised that she was not authorized

to practice law in the state of Illinois or hold herself out as so authorized. Respondent was further advised that, should she practice law or hold herself out as authorized to do so while removed from the master roll, she would be subject to disciplinary action.

ANSWER: Respondent admits that she had not complied with MCLE requirements as of May 18, 2020. Respondent has no personal knowledge of actions taken by the Administrator. Respondent does not recall if or when she received the described notice.

10. On July 8, 2020, pursuant to Supreme Court Rule 756, the Administrator recorded Respondent's failure to register as a second basis for her removal from the roll of attorneys authorized to practice law in Illinois. A notice of removal for failure to register was sent to Respondent on July 13, 2020, and Respondent received the Notice of Removal shortly thereafter. In the Notice of Removal, Respondent was advised that she was not authorized to practice law or hold herself out as so authorized. Respondent was further advised that, should she practice law or hold herself out as authorized to do so while removed from the master roll, she would be subject to disciplinary action and may be held in contempt of Court.

ANSWER: Respondent has no personal knowledge of actions taken by the Administrator. Respondent does not recall if or when she received the described notice.

11. Between May 18, 2020 until May 1, 2023, the date a complaint was voted in this matter, Respondent had been removed from the master roll at all times and was not authorized to practice law.

ANSWER: Admit.

COUNT I

(Lack of Diligence and Failure to Return Unearned Fees – Collins Matter)

12. On April 4, 2019, Zena Mark (“Mark”) filed a Petition for Allocation of Parental Responsibilities related to her minor child and the child’s biological father, Darrin Collins (“Collins”). The matter was docketed as *In re the Parentage of Z. Collins*, case number 2019D003145, in Cook County, Illinois. Mark sought to relocate their minor child to Grand Rapids, Michigan.

ANSWER: Admit.

13. On September 11, 2019, Judge John Carr denied Mark’s Petition to permanently relocate the minor child to Grand Rapids, Michigan. On the same date, Judge Carr allowed Mark’s petition to temporarily relocate the child to Grand Rapids, Michigan and granted Collins visitation rights. On December 20, 2019, Judge Carr modified his September 11, 2019 order to provide for additional visitation time and scheduling.

ANSWER: Admit.

14. On December 31, 2019, Mark filed a petition to vacate or modify Judge Carr’s September 11, 2019 order. Specifically, Mark petitioned the court to vacate the denial of the petition for permanent relocation.

ANSWER: Admit.

15. Between January 14, 2020 and January 23, 2020, Respondent and Collins agreed Respondent would represent Collins in case number 2019D003145. At that time, they entered into a written fee agreement by which Respondent and Collins agreed that Respondent would accept a flat fee of \$1,500 as her fee in this matter. Respondent agreed, *inter alia*, the flat fee included

“[h]earings through the resolution of the matter” and [p]re-trial conferences through the resolution of the matter.

ANSWER: Admit.

16. On January 23, 2020, Collins paid Respondent \$750 as partial payment of her fee. On March 1, 2020, Collins paid respondent the remaining \$750 of her fee.

ANSWER: Admit.

17. On March 4, 2020, Respondent filed her appearance on behalf of Collins in case number 2019D003145.

ANSWER: Admit.

18. On March 23, 2020, the court, due to the COVID-19 pandemic, the court decided that the case was an emergency and ordered a telephonic hearing on March 24, 2020 at 10:30 a.m.

ANSWER: Admit.

19. On March 24, 2020, Respondent appeared telephonically for a hearing in case number 2019D003145 before Judge Judith Rice. On the same date, Judge Rice entered and continued the hearing by agreement of the parties to March 27, 2020 at 10:30 a.m.

ANSWER: Admit.

20. On March 25, 2020, Collins called and emailed Respondent to determine the status of his matter. Respondent did not respond to Collins.

ANSWER: Admit.

21. Respondent did not appear for the hearing on March 27, 2020. Respondent was contacted via telephone by the Court during the hearing but was not available. On the same day, Judge William Yu granted Mark’s motion to modify and suspended Collins’s parenting time for the duration of the COVID-19 pandemic.

ANSWER: Admit.

22. On April 15, 2020, Mark filed a motion to reschedule the hearing on the motion to vacate. Mark emailed Respondent a notice of motion to reschedule the motion to vacate.

ANSWER: Admit.

23. On April 20, 2020, Collins appeared via Zoom video conference for a hearing on the motion to vacate. Respondent did not appear. Judge Carr ordered the matter continued for Respondent to appear and ordered Respondent to schedule the date with Mark's counsel.

ANSWER: Admit.

24. On April 21, 2020 and April 22, 2020, Collins emailed Respondent to determine the status of his matter and specifically requested an update on the future court date. Respondent did not respond to Collins.

ANSWER: Admit.

25. On May 5, 2020, Mark emailed Collins and Respondent notice of the new court date of May 8, 2020.

ANSWER: Admit.

26. On May 8, 2020, Respondent appeared in court for the hearing on Mark's petition to vacate. Judge Carr granted the petition to vacate the September 11, 2019 order and continued the matter for status on June 2, 2020.

ANSWER: Admit.

27. At no time prior to May 18, 2020, did Respondent do work sufficient to earn the \$1,500 fee. Respondent agreed to attend pre-trial hearings and hearings through the resolution of the matter for \$1,500. Respondent did not attend the pre-trial hearings and hearings through the resolution of the matter. Respondent did not do the work to justify retaining the entire fee.

ANSWER: Admit.

28. At no time did Respondent inform Collins or the court that she was removed from the master roll of attorneys licensed to practice law in the state of Illinois for her failure to comply with MCLE requirements and her failure to register and was therefore not authorized to practice law and could no longer represent Collins. At no time did Respondent seek leave of court to withdraw from representation of Collins.

ANSWER: Admit.

29. On May 18, 2020, Respondent was removed from the master roll of attorneys licensed to practice law in Illinois.

ANSWER: Admit.

30. As of May 1, 2023, the date a complaint was voted in this matter, Respondent had not returned any portion of the funds owed to Collins.

ANSWER: Admit.

31. 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 failing to appear in court on March 27, 2020 and April 20, 2020, in violation of Rule 1.3 of the Illinois Rules of Professional Conduct (2010);
- b. failing to keep the client reasonably informed about the status of the matter and failing to promptly comply with reasonable requests for information, by conduct including failing to respond to Collins's requests for the status of his matter in violation of Rule 1.4 of the Illinois Rules of Professional Conduct (2010);
- c. failure to terminate representation when her continued representation will result in a violation of the Rules of Professional Conduct by conduct including failing to terminate representation of Collins when she was

removed from the master roll in violation of Rule 1.16(a)(1) of the Illinois Rules of Professional Conduct; and

- d. failing to promptly refund to Collins upon discharge any portion of the \$1,500 fee paid in advance that had not been earned, in violation of Rule 1.16(e) of the Illinois Rules of Professional Conduct (2010).

ANSWER: The allegations contained in paragraph 7 constitute legal conclusions, and therefore, no answer is required

COUNT II

(Lack of Diligence, and Unauthorized Practice of Law – Dixon Matter)

32. On February 28, 2019, Aaron Dixon (“Dixon”) was charged with two counts of violating 720 ILCS 5/17-10.6(h) continuing financial crimes enterprise. The case was docketed as *People v. Aaron Dixon*, case number 2019 CF 324, in Will County, Illinois.

ANSWER: Admit.

33. On February 28, 2019, Respondent and Dixon agreed that Respondent would represent Dixon in proceedings related to case 2019CF324. Respondent and Dixon agreed that Respondent would accept an initial deposit of \$5,000 and \$300 per month thereafter to handle the criminal case. Respondent did not reduce the agreement to writing.

ANSWER: Admit.

34. Between February 28, 2019 and May 18, 2020, Dixon, or someone at his direction, paid Respondent \$10,000.

ANSWER: Admit.

35. On March 7, 2019, Respondent filed her appearance on behalf of Dixon and a two-page motion to reduce bond.

ANSWER: Admit.

36. On March 14, 2019, Dixon's matter was superseded by direct indictment by a grand jury. On the same day, Dixon posted a bail bond deposit of \$15,000 and was released from custody.

ANSWER: Admit.

37. On June 11, 2019 Respondent was present in court for a pre-trial hearing on Dixon's matter. The matter was continued to August 15. Respondent received notice of the August 15, 2019 pretrial hearing and did not appear. On the same day, the Clerk of the Court notified Respondent via telephone that the matter had been rescheduled for her to appear on September 26, 2019.

ANSWER: Admit.

38. On September 26, 2019, Dixon's matter was set for a pretrial hearing, Respondent did not appear.

ANSWER: Admit.

39. On May 18, 2020, Respondent was removed from the master roll of attorneys licensed to practice law in Illinois.

ANSWER: Admit.

40. On June 3, 2020, Respondent appeared in court for a pretrial hearing in Dixon's matter.

ANSWER: Admit.

41. When Respondent appeared in court on June 3, 2020, she knew she was not authorized to practice law.

ANSWER: Respondent does not recall whether she had received notice that she had been removed from the master roll of attorneys before June 3, 2020.

42. At no time did Respondent inform Dixon or the court that she was removed from the master roll of attorneys licensed to practice law in the state of Illinois for not complying with MCLE requirements and for not registering and was therefore not authorized to practice law and could no longer represent Dixon. At no time did Respondent seek leave of court to withdraw from representation of Dixon.

ANSWER: Admit.

43. At no time did Respondent return to the Will County State's Attorney or the Will County Public Defender any of the discovery she was tendered in Dixon's matter.

ANSWER: Admit.

44. As of May 1, 2023, the date a complaint was voted in this matter, Respondent had not returned any portion of the funds owed to Dixon.

ANSWER: Respondent admits that she did not return funds to Dixon.

45. 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 not appearing in court on August 15, 2019, and September 26, 2019, in violation of Rule 1.3 of the Illinois Rules of Professional Conduct (2010);
- b. failure to terminate representation when her continued representation will result in a violation of the Rules of Professional Conduct by conduct including failing to terminate representation of Dixon when she was removed from the master roll in violation of Rule 1.16(a)(1) of the Illinois Rules of Professional Conduct; and
- c. practicing law in a jurisdiction in violation of the regulation of the legal profession in that jurisdiction, by continuing to represent Dixon in his criminal case and holding herself out as an attorney to Dixon and the court

after her name was removed from the roll of licensed attorneys in Illinois, in violation of Rule 5.5(a) of the Illinois Rules of Professional Conduct (2010) and Supreme Court Rule 756(d).

ANSWER: The allegations contained in paragraph 7 constitute legal conclusions, and therefore, no answer is required

COUNT III

(Lack of Diligence and Failure to Return Unearned Fees – Weaver Matter)

46. On February 5, 2018, James Weaver (“Weaver”) filed a Petition for Allocation of Parental Responsibilities related to his minor child and the child’s biological mother, Nicole Intoe (“Intoe”). The matter was docketed as *James Weaver v. Chaundi Nicole Intoe*, case number 2018D079170, in Cook County, Illinois.

ANSWER: Admit.

47. On December 16, 2019, Respondent and Weaver agreed Respondent would represent Weaver in case number 2018D079170. At that time, they entered into a written fee agreement by which Respondent and Weaver agreed that Respondent would accept a flat fee of \$2,500 as her fee in this matter. Respondent agreed, *inter alia*, the flat fee included “[h]earings through the resolution of the matter” and [p]re-trial conferences through the resolution of the matter.

ANSWER: Admit.

48. Between December 21, 2019 and January 4, 2020, Weaver paid Respondent \$2,500 as payment of her fee in the matter.

ANSWER: Admit.

49. On January 8, 2020, Respondent filed her appearance on behalf of Weaver in case number 2018D079170.

ANSWER: Admit.

50. On January 24, 2020, Respondent appeared in court and the matter was continued to March 27, 2020 at 10:00 a.m. for a pretrial conference. From March 27, 2020 until June 25, 2020, the courthouse was closed and the matter was continued due to the COVID-19 pandemic.

ANSWER: Admit.

51. At no time prior to May 18, 2020, did Respondent do work sufficient to earn the \$2,500 fee. Respondent agreed to attend pre-trial hearings and hearings through the resolution of the matter for \$1,500. Respondent did not attend the pre-trial hearings and hearings through the resolution of the matter. Respondent did not do the work to justify retaining the entire fee.

ANSWER: Respondent denies that she agreed to attend pre-trial hearings and hearings through the resolution of the matter for \$1500. Respondent admits the remaining allegations of Par. 51.

52. On May 18, 2020, Respondent was removed from the master roll of attorneys licensed to practice law in Illinois.

ANSWER: Admit.

53. At no time prior to November 4, 2020 did Respondent inform Weaver or the court that she was removed from the master roll of attorneys licensed to practice law in the state of Illinois for not complying with MCLE requirements and not registering and was therefore not authorized to practice law and could no longer represent Weaver.

ANSWER: Admit.

54. On July 7, 2020, A.J. Rodriguez (“Rodriguez”), a friend of Weaver, sent Respondent an email and carbon copied Weaver asking Respondent to provide an update on the matter. Respondent did not provide an update to Weaver or Rodriguez.

ANSWER: Admit.

55. On October 8, 2020, Weaver emailed Respondent requesting an itemized bill and describing Respondent's lack of communications.

ANSWER: Admit.

56. On October 9, 2020 Respondent emailed Weaver and apologized for her lack of communication. Respondent promised a detailed letter of withdrawal and an itemized bill. Respondent did not inform Weaver that she was removed from the master roll of attorneys licensed to practice law in the state of Illinois because Respondent did not comply with MCLE requirements and did not register and was therefore not authorized to practice law and could no longer represent Weaver.

ANSWER: Admit.

57. On October 18, 2020, Rodriguez again emailed Respondent on behalf of Weaver. Rodriguez requested an itemized invoice and a refund of any unearned fees.

ANSWER: Admit.

58. On November 4, 2020, Weaver requested a refund of all funds paid to Respondent. On the same day, Respondent sent Weaver an email informing him she was removed from the master roll of attorneys. Respondent included a bill for services. The bill Respondent drafted included claimed hours worked on behalf of Weaver on June 17, 2020; June 25, 2020; and July 1, 2020.

ANSWER: Admit.

59. In her November 4, 2020 email to Weaver, Respondent stated that she was removed from the master roll of attorneys in July 2020.

ANSWER: Admit.

60. Respondent's statement that she had been removed from the master roll in July 2020 was false because she had been removed on May 18, 2020.

ANSWER: Respondent is unable to recall when she received notice that she had been removed from the master roll and what she understood about the effective date of her removal, and therefore neither admits nor denies.

61. Respondent knew that her statement that she had been removed from the master roll in July 2020 was false because she had received notice from the ARDC that she had been removed on May 18, 2020.

ANSWER: Deny.

62. As of May 1, 2023, the date a complaint was voted in this matter, Respondent had not returned any portion of the funds owed to Weaver.

ANSWER: Admit.

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

- a. failing to keep the client reasonably informed about the status of the matter and failing to promptly comply with reasonable requests for information, by conduct including failing to respond to Weaver's requests for the status of his matter in violation of Rule 1.4 of the Illinois Rules of Professional Conduct (2010);
- b. failure to terminate representation when her continued representation will result in a violation of the Rules of Professional Conduct by conduct including failing to terminate representation of Weaver when she was removed from the master roll in violation of Rule 1.16(a)(1) of the Illinois Rules of Professional Conduct; and
- c. failing to promptly refund to Weaver upon discharge any portion of the \$2,500 fee paid in advance that had not been earned including but not limited to fees Respondent

claimed to have earned while she was not authorized to practice law, in violation of Rule 1.16(e) of the Illinois Rules of Professional Conduct (2010); and

- d. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including falsely claiming she was removed from the master roll in July 2020 in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

Answer: The allegations contained in paragraph 7 constitute legal conclusions, and therefore, no answer is required.

COUNT IV

(Lack of Diligence and Failure to Return Unearned Fees – Wright Matter)

64. On January 10, 2020, Respondent and Mario Wright (“Wright”) agreed Respondent would represent Wright in a child support matter docketed as case number 2014D051761. At that time, they entered into a written fee agreement by which Respondent and Wright agreed that Respondent would accept a flat fee of \$2,500 as her fee in this matter. Respondent agreed, inter alia, the flat fee included “[h]earings through the resolution of the matter,” “[m]otions, pleadings, or answers to a motion/pleading through the resolution of the matter,” and [p]re-trial conferences through the resolution of the matter.

ANSWER: Admit.

65. Between January 11, 2020 and February 22, 2020, Wright paid Respondent \$2,500 as payment of her fee in the matter.

ANSWER: Admit.

66. On March 4, 2020, Respondent filed her appearance on behalf of Wright in case number 2014D051761.

ANSWER: Admit.

67. From March 27, 2020 until June 22, 2020 the courthouse was closed, and the matter was continued due to the COVID-19 pandemic.

ANSWER: Admit.

68. On May 18, 2020, Respondent was removed from the master roll of attorneys licensed to practice law in Illinois. On that same date, Wright asked Respondent to prepare an emergency motion to reconsider child support. Respondent agreed to prepare the motion as included in the fee agreement.

ANSWER: Admit.

69. At no time prior to May 18, 2020, did Respondent complete the emergency motion and did not do work sufficient to earn the entire \$2,500 fee.

ANSWER: Admit.

70. On May 19, 2020 and June 15, 2020, Wright sent a text message to Respondent requesting the status of his matter. Respondent did not respond to Wright's text messages.

ANSWER: Admit.

71. On July 8, 2020, Wright sent a text message to Respondent informing her of the July 17, 2020 court date. Respondent acknowledged via text message that she received notice of the Court date.

ANSWER: Admit.

72. On July 14, 2020, Wright sent a text message to Respondent requesting a phone call prior to the July 17, 2020 court date.

ANSWER: Admit.

73. Respondent did not respond to Wright's text message and did not call Wright.

ANSWER: Admit.

74. At no time did Respondent inform Wright or the court that she was removed from the master roll of attorneys licensed to practice law in the state of Illinois for not complying with MCLE requirements and not registering and was therefore not authorized to practice law and could no longer represent Wright.

ANSWER: Admit.

75. On July 14, 2020, Respondent did not appear in court.

ANSWER: Admit.

76. On July 17, 2020, Respondent sent a text message to Wright apologizing for the delay in communication and claiming that she had spoken to the State's Attorney, had requested a seven-day continuance, and was informed the earliest court date was in October. Wright requested refund of \$1,500 of his fees. Respondent agreed to send a motion to withdraw and a refund.

ANSWER: Admit.

77. On August 11, 12, 15, and 17, 2020, Wright requested an update on the status of his refund. Respondent did not respond to Wright's requests.

ANSWER: Admit.

78. As of May 1, 2023, the date a complaint was voted in this matter, Respondent had not returned any portion of the funds owed to Wright.

ANSWER: Admit.

79. 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 failing to appear in court on July 14, 2020, in violation of Rule 1.3 of the Illinois Rules of Professional Conduct (2010);

- b. failing to keep the client reasonably informed about the status of the matter and failing to promptly comply with reasonable requests for information, by conduct including failing to respond to Wright's requests for the status of his matter in violation of Rule 1.4 of the Illinois Rules of Professional Conduct (2010);
- c. failure to terminate representation when her continued representation will result in a violation of the Rules of Professional Conduct by conduct including failing to terminate representation of Collins when she was removed from the master roll in violation of Rule 1.16(a)(1) of the Illinois Rules of Professional Conduct;
- d. failure to comply with applicable law requiring notice to or permission of a tribunal when terminating a representation by conduct including failing to provide notice to or get permission from the tribunal prior to terminating her representation of Wright, in violation of Rule 1.16(c) of the Illinois Rules of Professional Conduct (2010); and
- e. failing to promptly refund to Wright upon discharge any portion of the \$1,500 fee paid in advance that had not been earned, in violation of Rule 1.16(e) of the Illinois Rules of Professional Conduct (2010).

ANSWER: The allegations contained in paragraph 7 constitute legal conclusions, and therefore, no answer is required.

COUNT V

(Failure to cooperate with a disciplinary investigation)

77. On November 10, 2021, the Administrator sent Respondent an email at the email address Respondent registered with the ARDC. The email requested a response to the allegations raised by Mr. Wright.

ANSWER: Respondent does not recall the described email, and so neither admits nor denies.

78. At no time did Respondent submit a written response to the Administrator's November 10, 2021 email.

ANSWER: Respondent does not recall receiving the email, nor does she recall having submitted a response to allegations raised by Mr. Wright.

79. On January 26, 2022, the Administrator served Respondent with a subpoena to appear for a sworn statement on February 10, 2022 via the digital platform WebEx. The Administrator served the subpoena to the email address Respondent registered with the ARDC. The subpoena commanded Respondent to appear before the Administrator via WebEx on February 10, 2022 at 1:00 p.m. Respondent received the subpoena to her email address but did not appear for the sworn statement.

ANSWER: Admit.

80. On March 29, 2022, the Administrator served Respondent with a subpoena to appear for a sworn statement on April 19, 2022 via the digital platform WebEx. The Administrator served the subpoena via email to the email address Respondent registered with the ARDC, and certified mail to the address Respondent registered with the ARDC. The subpoena commanded Respondent to appear before the Administrator via WebEx on April 19, 2022 at 1:00 p.m. Respondent did not appear for the sworn statement.

ANSWER: Admit.

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

- a. knowingly failing to respond to a lawful demand for information from a disciplinary authority by conduct including failing to respond to the Administrator's November 10, 2021 email, and failing to appear for her February 10, 2022 and April 19, 2022 sworn statements,

in violation of Rule 8.1(b) of the Illinois Rules of Professional Conduct (2010).

ANSWER: The allegations contained in paragraph 7 constitute legal conclusions, and therefore, no answer is required.

RESPONDENT'S DISCLOSURE PURSUANT TO COMMISSION RULE 23

Respondent is not admitted to practice law in any jurisdiction other than Illinois and holds no professional licenses other than her license to practice law

Respectfully submitted,

/s/ Mary Robinson
Mary Robinson
Attorney for Kenese Lashea Dowdy

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