

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

In The Matter Of:

AARON TRENT KORSON,

Respondent,

No. 6331873.

Commission No. 2024PR00056

**ANSWER TO ADMINISTRATOR'S COMPLAINT**

Aaron Trent Korson, Respondent, by his attorney, Stephanie Stewart, of Robinson, Stewart, Montgomery & Doppke LLC, answers the Complaint filed by the Administrator in this matter, as follows:

**DISCLOSURE PURSUANT TO COMMISSION RULE 231**

- a. Respondent is not licensed in any other jurisdiction.
- b. Respondent does not hold any other professional license.

**COUNT I**

*(Dishonesty – Creation of False Online Reviews Regarding Respondent)*

1. At all times related to this complaint, Avvo.com (“Avvo”) was a website which provided lawyer referrals and access to a database of previously answered legal questions. On any lawyer’s Avvo profile, clients may leave reviews of the lawyer’s services by providing a summary of their experience and rating the lawyer’s services between one and five stars.

FILED  
10/17/2024 12:27 PM  
ARDC Clerk

**ANSWER: Respondent admits the first sentence. Respondent denies the second sentence, to the extent that it implies that only clients are able to leave reviews for a lawyer on Avvo.**

2. At all times, Avvo only allowed individuals to submit reviews based on their personal experience with a lawyer whom they hired or consulted with.

**ANSWER: Deny as Avvo has “guidelines” on their website for individuals who have hired attorneys or consult with attorneys, but is not responsible for reviews as outlined in their terms of service and makes no guarantee as to the reviews, but is in fact a public forum.**

3. At all times related to this complaint, FindLaw.com (“FindLaw”) was a website which provided a lawyer directory and other online legal information. On any lawyer’s FindLaw profile, clients may leave reviews of the lawyer’s services by providing a summary of their experience and rating the lawyer’s services between one and five stars.

**ANSWER: Respondent admits the first sentence. Respondent denies the second sentence to the extent it implies that only clients are able to leave reviews for a lawyer on Findlaw.**

4. At all times, FindLaw only allowed individuals to submit reviews based on their personal experience with a lawyer whom they hired or consulted with.

**ANSWER: Deny as Findlaw states that an individual can “share [his/her] opinion of working with” a lawyer.**

5. Beginning in August 2019 and continuing to May 2024, Respondent submitted at least twenty-eight false five-star reviews to the Avvo profile for himself, Aaron Korson, a sampling of which are set forth in the table below:

<b>Date and Time</b>	<b>Reviewer IP Address</b>	<b>Reviewer Email</b>	<b>Review</b>
08/25/19, 21:15	172.58.140.154	<a href="mailto:pikeplaceinvestments@gmail.com">pikeplaceinvestments@gmail.com</a>	I worked with Aaron on an immigration issue. He saved us a ton of time and money. He really went out of his way. He even referred me over to another personal injury attorney on a separate matter. Great guy!
05/30/20, 15:17	205.178.26.114	<a href="mailto:pikeplaceinvestments@gmail.com">pikeplaceinvestments@gmail.com</a>	Mr. Korson took a very large chance on my case. I was in a car accident and I kept being screwed by the insurance company. I talked to a friend about being a client of Aaron's. I knew he was a really understanding attorney due to some of the pro bono cases he took on. My friends kept telling me to go to him. He took the time to listen to me and he fought very very hard for me to win . I was paid out a lot more than I expected. Aaron

			was exactly what I needed.
04/18/21, 22:58	71.239.159.201	<a href="mailto:dani.levulis@gmail.com">dani.levulis@gmail.com</a>	Aaron provided great services per usual. He is a hard and aggressive litigator. He knows how to stick it to the other person. I thoroughly loved his skills.

04/21/21, 19:24	71.239.159.201	<a href="mailto:alexmendezchicago@gmail.com">alexmendezchicago@gmail.com</a>	I thought he was very intelligent. He worked hard and got us what we needed with regard to our case. He worked with us on pricing. We definitely got value for our money.
04/21/21, 19:28	71.239.159.201	<a href="mailto:robbyperez2020@gmail.com">robbyperez2020@gmail.com</a>	He helped me out of a tough divorce. I didn't think he would be able to negotiate so well given the facts of the case. I ended up with some really great results. I am recommending Aaron and his services.

08/29/21, 15:29	71.239.159.201	<a href="mailto:deloresallenrealtychicago@gmail.com">deloresallenrealtychicago@gmail.com</a>	Mr. Korson has always gone above and beyond for me. When I need help, I usually email him since I know that he is in court a lot of the time. However, as soon as he receives an email he usually responds in a quick manner or he tries to find time for me. I am a bit older and I am going through a nasty divorce. Every time that he has tried to help me, he has put me
			at ease and made me feel better about the situation. He is fighting for me every day and I can't thank him enough.

12/02/23, 00:23	38.124.108.87	<a href="mailto:pikeplaceinvestments@gmail.com">pikeplaceinvestments@gmail.com</a>	Hard worker who treats his clients well. He has worked hard to get the work I need done. Hired him for a landlord matter. Got me money that I have been looking to collect.
12/03/23, 20:08	38.124.108.87	<a href="mailto:johnnapoli271@gmail.com">johnnapoli271@gmail.com</a>	Mr. Korson did some pro bono work for me and gave me the legal advice that I needed to help me start up my company. He is a hard worker and knowledgeable about many areas of law. I really appreciate him and I will be making sure I send him a lot of business very soon.

05/06/24, 14:47	73.8.64.87	<a href="mailto:deborahlancon755@gmail.com">deborahlancon755@gmail.com</a>	Mr. Aaron Korson got me my kids and a great settlement out of my case. Without him, I would not have stood a fighting chance. He was kind and helped me when no one else would assist. I am very grateful.
05/06/24, 15:44	73.8.64.87	<a href="mailto:bfigl@yahoo.com">bfigl@yahoo.com</a>	Aaron Korson is the best attorney I have ever met. He works hard for his clients, he cares about how they do, he is kind and courteous and goes the extra mile for



			<p>everyone. He is the best at divorce and child custody matters. I greatly appreciate him.</p>
<p>05/06/24, 16:01</p>	<p>73.8.64.87</p>	<p><a href="mailto:admin@hireomega.com">admin@hireomega.com</a></p>	<p>We are so fortunate to have worked with Mr. Korson, he was a great person to me during my divorce. I didn't think I was going to come out of the case with a nickel to my name and yet, he came and helped me in the end. I greatly appreciate him.</p>

05/06/24, 16:19	73.8.64.87	<a href="mailto:hostile.gathers0n@icloud.com">hostile.gathers0n@icloud.com</a>	Aaron and his staff were great to work with. I am forever grateful for hi and fighting for our rights. Thank you so much for all of your hard work and everything that you do for the community. You are a good man and an amazing attorney.
05/06/24, 18:44	73.8.64.87	<a href="mailto:raylamantia@gmail.com">raylamantia@gmail.com</a>	Aaron is a great attorney to work with. I thoroughly appreciate the hard work and kindness he has shared with me.

05/06/24, 19:24	73.8.64.87	<a href="mailto:korsona@icloud.com">korsona@icloud.com</a>	I have to say that Chicago Family Attorneys LLC has made me the happiest client. They represented me in my divorce and did an amazing job. I am forever thankful.
05/08/24, 23:57	50.235.166.162	<a href="mailto:condo.dawn-01@icloud.com">condo.dawn-01@icloud.com</a>	I thoroughly enjoyed working with Mr.

			<p>Korson and Chicago Family Attorneys, LLC. They did a wonderful job on my divorce and family law case. I couldn't be a happier client.</p>
<p>05/08/24, 23:59</p>	<p>50.235.166.162</p>	<p><a href="mailto:reign_tackles0v@icloud.com">reign_tackles0v@icloud.com</a></p>	<p>Aaron was a hard working attorney on my case who came through when I needed the proper representation most. I really appreciate his hard work and the kindness he showed me and my family.</p>

05/09/24, 00:04	50.235.166.162	<a href="mailto:francs.hafnium-0j@icloud.com">francs.hafnium-0j@icloud.com</a>	This is a strong attorney who will fight for your case tooth and nail. I am proud to have Mr. Korson represent me in court.
05/09/24, 00:08	50.235.166.162	<a href="mailto:musher-poxes.0v@icloud.com">musher-poxes.0v@icloud.com</a>	Mr. Korson is an absolute amazing person to work with. He has done so much for me that I can't find a proper way to thank him for all of his hard work. Thank you so much, Mr. Korson. I would not have gotten through my divorce and child custody matter without you.

05/09/24, 00:23	50.235.166.162	<a href="mailto:squares-01-rodent@icloud.com">squares-01-rodent@icloud.com</a>	I can't thank Mr. Korson enough. He was a very good attorney. My former spouse and I had a very rough divorce and without Mr. Korson, we wouldn't have been able to settle the matter amicably.
05/09/24, 00:30	50.235.166.162	<a href="mailto:rials_valve0m@icloud.com">rials_valve0m@icloud.com</a>	Working with Mr. Korson has been an incredible experience. His dedication and effort are beyond words of gratitude. I deeply appreciate all his hard work-without his help, I could not have navigated through my divorce and child custody issues. Thank you, Mr. Korson.

05/09/24, 00:50	50.235.166.162	<a href="mailto:putter-roughs.0o@icloud.com">putter-roughs.0o@icloud.com</a>	As an attorney in the city of Chicago, Mr. Korsen was one option out of thousands and I still chose to work with Chicago Family Attorneys, LLC because of how hard he is known to work . I had him recommended to me by several other people and I couldn't have been happier.
05/09/24, 18:49	73.8.64.87	<a href="mailto:time_cash.0t@icloud.com">time_cash.0t@icloud.com</a>	Mr. Korson did a great job on my divorce and child custody matter. He helped us out when there were hardly any other options left. He worked with me very well and he was worth every dollar that I spent.

05/09/24, 18:51	73.8.64.87	<a href="mailto:berg-sinkers0w@icloud.com">berg-sinkers0w@icloud.com</a>	Chicago Family Attorneys assisted me in my child custody matter in 2023 and they did a wonderful job. We just finished up our case and I have joint custody now
			when I originally had none.



05/09/24, 18:55	73.8.64.87	<a href="mailto:cosmic.concave.0a@icloud.com">cosmic.concave.0a@icloud.com</a>	Without Mr. Korson's assistance, I would not have had the opportunity to gain joint custody with my little girl. I had been previously incarcerated for a DUI and Aaron even showed up and wrote a letter to the judge so I could have a lighter sentence since I am the primary caretaker of my daughter.
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**ANSWER: Deny. In further answering, Respondent states that he requested that friends and family members leave reviews.**

6. The reviews submitted to Respondent's Avvo profile between August 2019 and May 2024, as set forth in paragraph five, above, were false because Respondent submitted the reviews, not any current, former or prospective clients of Respondent.

**ANSWER: Deny.**

7. Respondent knew the reviews submitted to his Avvo profile between August 2019 and May 2024, as set forth in paragraph five, above, were false at the time he submitted the reviews.

**ANSWER: Deny.**

8. Beginning in June 2023 and continuing to May 2024, Respondent submitted at least ten false five-star reviews to the FindLaw profile for himself, Aaron Korson, a sampling of which are set forth in the table below:

<b>Date and Time</b>	<b>Reviewer IP Address</b>	<b>Reviewer Email</b>	<b>Review</b>
06/27/23, 5:39	38.124.108.102	<a href="mailto:pikeplaceinvestments@gmail.com">pikeplaceinvestments@gmail.com</a>	Amazing Attorney Doing Gods Work. That's how I describe Aaron Korson and his staff. He is an amazing attorney who won my case with ease and he
			has been a delight to work with. We are very grateful.
11/02/23, 5:00	193.42.0.19	<a href="mailto:pikeplaceinvestments@gmail.com">pikeplaceinvestments@gmail.com</a>	Aaron managed to get me a child support trust. He froze over \$300,000 of my ex's and got me a very favorable outcome. I can't thank him enough for all of his hard work. He has been a phenomenal attorney.
11/24/23, 9:42	174.207.36.230	<a href="mailto:detroitvintageworks@gmail.com">detroitvintageworks@gmail.com</a>	Mr. Korson was great to work with. He won my case for me and did an amazing job.
5/6/2024, 22:41	73.8.64.87	<a href="mailto:bctfig1@yahoo.com">bctfig1@yahoo.com</a>	Aaron was a great attorney to work with. He is a good hearted person who works hard for his clients. We are lucky to have had him on our case.

5/7/2024, 3:16	73.8.64.87	<a href="mailto:korsona@icloud.com">korsona@icloud.com</a>	Aaron Korson is a phenomenal attorney. I greatly appreciate him and his hard work. He has helped me in my divorce so much,
5/9/2024, 7:13	50.235.166.162	<a href="mailto:musher-poxes.0v@icloud.com">musher-poxes.0v@icloud.com</a>	Chicago Family Attorneys, LLC is a great law firm to work with. They handled my family law and divorce matter quickly and efficiently. Thank you so much for all of your work.
5/9/2024, 7:54	50.235.166.162	<a href="mailto:sackful-bishops06@icloud.com">sackful-bishops06@icloud.com</a>	Mr. Korson is such a great attorney. He helped me through my family law and divorce matter and I greatly appreciate him.

**ANSWER: Deny. In further answering, Respondent states that he requested that friends and family members leave reviews.**

9. The reviews submitted to Respondent’s FindLaw profile between June 2023 and May 2024, as set forth in paragraph eight, above, were false because Respondent submitted the reviews, not any current, former or prospective clients of Respondent.

**ANSWER: Deny.**

10. Respondent knew the reviews submitted to his FindLaw profile between June 2023 and May 2024, as set forth in paragraph eight, above, were false at the time he submitted the reviews.

**ANSWER: Deny.**

11. Beginning in December 2023 and continuing to May 2024, Respondent submitted at least six false five-star reviews to the FindLaw profile for his law firm, Chicago Family Attorneys, LLC (“CFA”), a sampling of which are set forth in the table below:

<b>Date and Time</b>	<b>Reviewer IP Address</b>	<b>Reviewer Email</b>	<b>Review</b>
12/04/23, 16:18	172.93.177.164	<a href="mailto:johnnapoli271@gmail.com">johnnapoli271@gmail.com</a>	This law firm was amazing to work with. The owner was very kind to my family members who were already going through a hard time and the fact that we received such care meant a lot to us. We are very grateful.
12/04/23, 16:24	172.93.177.164	<a href="mailto:bradthemanjohnson360@gmail.com">bradthemanjohnson360@gmail.com</a>	Definitely appreciate the firm for the hard work. They handled my matter in a very professional way and did a great job.
5/7/2024, 3:17	104.28.32.92	<a href="mailto:korsona@icloud.com">korsona@icloud.com</a>	This law firm has done such a good job on my case. They have helped me throughout my divorce and child custody matter so much. I greatly appreciate them.
5/9/2024, 7:15	50.235.166.162	<a href="mailto:musher-poxes.0v@icloud.com">musher-poxes.0v@icloud.com</a>	This is am amazing law firm to work with. I was so lucky to have them
			represent me in my divorce and family law matter. Thank you so much!
5/9/2024, 7:33	50.235.166.162	<a href="mailto:warmer.imageoes0o@icloud.com">warmer.imageoes0o@icloud.com</a>	Mr. Korson is truly outstanding to work with. He has done a tremendous amount for

			me, and I can hardly express my gratitude for his diligent efforts. Thanks to him, I managed to get through my divorce and custody matters. A heartfelt thank you, Mr. Korson.
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**ANSWER: Deny. In further answering, Respondent states that he requested that friends and family members leave reviews.**

12. The reviews submitted to CFA’s FindLaw profile between December 2023 and May 2024, as set forth in paragraph 11, above, were false because Respondent submitted the reviews, not any current, former or prospective clients of Respondent.

**ANSWER: Deny.**

13. Respondent knew the reviews submitted to CFA’s FindLaw profile between December 2023 and May 2024, as set forth in paragraph 11, above, were false at the time he submitted the reviews.

**ANSWER: Deny.**

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

- a. conduct involving dishonesty, fraud, deceit, or misrepresentation by submitting multiple false reviews purporting to have come from Respondent’s clients to Respondent’s profile on Avvo.com between August 2019 and May 2024; Respondent’s profile on FindLaw.com between June 2023 and May 2024; and Chicago Family Attorneys, LLC’s FindLaw.com profile between December 2023 and May 2024, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

**ANSWER: Deny.**

## COUNT II

### *(Dishonesty – Creation of False Reviews Regarding Another Lawyer)*

15. On March 23, 2023, Respondent met with Samoane Williams (“Williams”) and agreed to represent her *pro bono* in a pending divorce proceeding filed in Cook County as case number 2022 D 9230 (“the divorce proceeding”) and a pending eviction matter filed in the Circuit Court of Cook County as case number 20231704266 (“the eviction matter”). Respondent assigned his associate to both of Williams’ matters.

**ANSWER: Admit except that Respondent denies that he agreed to represent Williams in her eviction matter or that he assigned an associate to that matter.**

16. On April 25, 2023, Respondent’s associate filed a motion to complete and exchange financial affidavits in the divorce proceeding and noticed the motion for presentment on May 15, 2023.

**ANSWER: Admit.**

17. On May 1, 2023, Respondent’s associate filed a petition for rule to show cause in the divorce proceeding, arising from the petitioner’s violation of a court order, and noticed the petition for presentment on May 15, 2023.

**ANSWER: Admit.**

18. On May 15, 2023, the court granted the petitioner 21 days to respond to the motion and petition filed on behalf of Williams in the divorce proceeding. Also on that date, the court set the motion and petition for an in-person hearing on July 14, 2023.

**ANSWER: Admit.**

19. On May 26, 2023, Respondent’s associate appeared in the eviction matter on behalf of Williams. On that date, the eviction matter was continued for a status on June 9, 2023.

**ANSWER: Respondent is unable to admit or deny due to lack of personal knowledge.**

20. On or about June 5, 2023, Respondent's associate left her employment with CFA.

**ANSWER: Admit.**

21. On June 9, 2023, Respondent, nor anyone from CFA, appeared in the eviction matter on behalf of Williams.

**ANSWER: Admit.**

22. On June 9, 2023, Respondent's associate notified Williams that she was no longer working for CFA. The next day, Respondent informed Williams that he would be handling both of her cases going forward.

**ANSWER: Admit, except Respondent denies that he informed Williams he would be handling the eviction matter.**

23. On July 14, 2023, Respondent and Williams attended the in-person hearing for the petition for rule to show cause, but the opposing party failed to appear. At that hearing, the court ordered a body attachment with a bond set at \$2,500. The matter was scheduled for another hearing on August 21, 2023. At the conclusion of the hearing, Respondent informed Williams he would go to his office and submit the body attachment order electronically.

**ANSWER: Admit, except that Respondent is unable to admit or deny that the scheduled hearing was for August 21, 2023, due to lack of knowledge at this time.**

24. Prior to the August 21, 2023, Williams attempted to contact Respondent about what to expect at the upcoming hearing in her divorce proceeding.

**ANSWER: Respondent is unable to admit or deny due to lack of personal knowledge.**

25. On August 21, 2023, Respondent sent Williams the following text:

We don't have a status this morning. I checked the docket. Judge Boyd didn't put in the order for some reason. I'm going to motion up a case management. We need one anyway since opposing counsel is in now.

**ANSWER: Admit.**

26. On August 29, 2023, Respondent informed Williams that he had spoken to opposing counsel and they were going to motion up the divorce proceeding.

**ANSWER: Admit.**

27. On September 12, 2023, the petitioner in the divorce proceeding filed a motion to maintain the status quo and a petition for interim and prospective attorney's fees. The motion and petition were noticed for presentment on September 22, 2023.

**ANSWER: Admit.**

28. On September 15, 2023, Williams retained attorney Mark Almanza ("Almanza") to represent her in the divorce proceeding and eviction matter.

**ANSWER: Respondent is unable to admit or deny the date that Williams retained Almanza due to lack of personal knowledge. The remaining allegations are admitted.**

29. On September 21, 2023, Almanza filed an appearance on behalf of Williams in the divorce proceeding.

**ANSWER: Admit.**

30. On September 22, 2023, Almanza appeared on behalf of Williams in the divorce proceeding.

**ANSWER: Respondent is unable to admit or deny due to lack of personal knowledge.**



31. On October 18, 2023, at 6:51 p.m., Almanza sent Respondent the following email regarding the divorce proceeding:

I am representing Samoane in her divorce and I have some concerns that I need you to address. First, can you send me all discovery documents, financial affidavits, and related documents. If you do not have them, please let me know.

Second, I do not see that you filed an appearance. Can you let me know what happened?

Third, and most importantly, I am concerned about what happened to the body attachment that was not entered. How did that happen? Because it was not entered, we are now having to re-litigate the matter. Also, I do not see the exhibits were attached to the motion. Can you please provide a full copy of the motion?

This matter needs urgent attention and I hope you respond in an expedited manner.

I really hope that you are able to address these matters as they reflect rather poorly on the handling of this matter up to this point.

I have included Samoane in this email and you can consider this request as coming directly from her as well.

**ANSWER: Admit.**

32. On October 18, 2023, at 7:57 p.m., Respondent sent Almanza the following email:

This is an extremely rude email. I think your email lacks professionalism as I have been handling this matter pro bono and assisting.

My prior paralegal sent in the order and we called and were told that the email was received.

Our office filed an appearance on the matter. I'm more than happy to provide any documents. However, I highly recommend you learn that your statements reflect poorly on you as a practitioner.

**ANSWER: Admit.**

33. Respondent's statement that his prior paralegal sent in the order and was told the email was received, as set forth in paragraph 32, above, was false because the order was not submitted to the court electronically by Respondent or his paralegal.

**ANSWER: Deny. Respondent's statement that an order was submitted by his prior paralegal was based on representations made to him and not personal knowledge.**

34. Respondent knew his statement regarding the electronic submission of the order, as set forth in paragraph 32, above, was false when he made it.

**ANSWER: Deny.**

35. On October 18, 2023, at 8:01 p.m., Respondent sent Almanza the following email:

The order of protection also was only continued since the party did not appear. There isn't anything to "re-litigate". You should be aware it isn't hard to motion it up.

I have been given significant pleadings we are working through at this time.

I hope Samoane hires an attorney that knows how to respond appropriately if she truly expects to settle this matter. You demonstrate a lack of common sense when working with others which is astonishing. If anything, you seem to be a joke if you talk like this to anyone who practices.

**ANSWER: Admit.**

36. On October 18, 2023, at 8:19 p.m. Respondent sent Almanza the following email:

I have communicated with my law clerk to send any documents no later than [the evening of October 20, 2023].

I am out of the office the next two days as my mom was recently diagnosed with breast cancer and I will be in Indiana.

If you have any further inappropriate comments to make, keep them to yourself. I don't appreciate the rude statements and Cook County is a small community of practitioners surprisingly. I also doubt that Samoane would want to have an attorney who is absolutely so rude to other practitioners representing her since she works for JEP which

preaches professionalism. You have shown a true lack of professionalism and a lack of knowledge, but I am more than happy to hand this case over to whomever would like to litigate this matter.

I will say, it doesn't seem as though you are qualified to even handle this matter given your background online as a criminal attorney or the statements you have made saying the matter needs to be "re-litigated". I disagree with what you said completely, but I blame that on what seems to be a lack of knowledge and common sense. I won't put up with anymore inappropriate or rude comments.

**ANSWER: Admit.**

37. On October 18, 2023, Respondent posted a one-star Google review for Almanza's law firm which stated: "An extremely rude practitioner. Steer clear."

**ANSWER: Admit.**

38. Respondent's statements in his Google review of Almanza, as set forth in paragraph 37, above, served no purpose other than to embarrass, delay, or burden Almanza.

**ANSWER: Deny.**

39. On October 19, 2023, at 8:23 a.m., Almanza emailed Respondent and asked him to remove the one-star Google review, as set forth in paragraph 37, above. Almanza also requested Respondent's file related to the eviction matter.

**ANSWER: Admit.**

40. On October 19, 2023, at 10:15 a.m., Respondent emailed Almanza and stated:

Absolutely not.

You're probably the most inappropriate attorney I've met. It's an honest assertion of you as a practitioner. People should steer clear of you.

If you don't like it, then ask Google.

I've got nothing more to say to you at this point. Like I said, I will have my staff send the complete file.

**ANSWER: Admit.**

41. On October 20, 2023, at 6:34 p.m., Williams emailed Respondent and requested he send over her entire case file.

**ANSWER: Admit.**

42. On October 20, 2023, at 10:17 p.m., Respondent sent Williams and Almanza the following email:

I said we would have my clerk send it over this evening.

I expect some professionalism out of you and your attorney. I just stated that my mom was sick.

It's still Friday. She is still working this evening wrapping up items for the day for me since I am out.

Have some professionalism and quit with the repeated emails. This is now the third day in a row and there has not been an objection to the date or an issue with it.

I find this ridiculous quite frankly.

**ANSWER: Admit.**

43. Respondent's statement that his law clerk was still working after 10:00 p.m. on the evening of October 20, 2023, as set forth in paragraph 42, above, was false because no law clerks were working for Respondent the evening of October 20, 2023.

**ANSWER: Deny.**

44. Respondent knew his statement regarding his law clerk working late into the evening of October 20, 2023, as set forth in paragraph 42, above, was false when he made it.

**ANSWER: Deny.**

45. On October 20, 2023, at 10:30 p.m., Respondent submitted a one-star review to Almanza's Avvo profile which said: "Mark has shown an inability in professionalism in my dealings with him. He is rude, makes blanket inaccurate statements, and shows an inability to work with others from my personal communication with him." The review was submitted by [detroitvintageworks@gmail.com](mailto:detroitvintageworks@gmail.com) and was associated with the IP address 172.222.113.186.

**ANSWER: Deny.**

46. The review submitted to Almanza's Avvo profile on October 20, 2023, at 10:30 p.m., as set forth in paragraph 45, above, was false because Respondent submitted the review, not a current, former, or prospective client of Almanza.

**ANSWER: Deny.**

47. Respondent knew the review submitted to Almanza's Avvo profile, as set forth in paragraph 45, above, was false at the time he submitted the review.

**ANSWER: Deny.**

48. Respondent's statements in his Avvo review of Almanza, as set forth in paragraph 45, above, served no purpose other than to embarrass, delay, or burden Almanza.

**ANSWER: Deny.**

49. On October 21, 2023, at 8:53 a.m., Almanza emailed Respondent and asked him to remove the one-star review he left on Almanza's Avvo profile. In the same email, Almanza renewed his request for Respondent's client files related to Williams, which were not produced by Respondent on October 20, 2023.

**ANSWER: Admit.**

50. On October 21, 2023, at 2:36 p.m., Almanza emailed Respondent a subpoena requesting the documents by October 28, 2023.

**ANSWER: Admit that Mark Almanza emailed a subpoena to Respondent on Saturday, October 21, 2023, that did not appear to have been filed and that was not properly served or noticed. .**

51. On October 21, 2023, at 4:59 p.m., Respondent emailed Almanza and stated: You might be a complete idiot.

My staff is sending over documents.

**ANSWER: Admit.**

52. Respondent's statement "you might be a complete idiot" served no other purpose than to embarrass, delay, or burden Almanza.

**ANSWER: Deny.**

53. On October 21, 2023, at 11:16 p.m., Respondent emailed Almanza and stated, in part:

I am filing an ARDC complaint against you immediately for the harassment and inappropriate use of a subpoena.

You have known I have been out for two days WORKING WITH MY MOM WHO HAS CANCER.

You are inappropriate, rude, and I hope you one day have to go through what I am experiencing now, but I would rather let the ARDC know how inappropriate you have been over the last several days.

**ANSWER: Admit.**

54. Respondent's statement "you are inappropriate, rude, and I hope you one day have to go through what I am experiencing now" served no purpose other than to embarrass, delay, or burden Almanza.

**ANSWER: Deny.**

55. On October 21, 2023, at 11:27 p.m., Respondent emailed Almaza and stated:

You realize that I have not had a single day with my mom who is sick WITH CANCER and UNDERGOING SURGERY [sic] without a ridiculous statement or stupid comment by you directed to me?

You have known that I have been out of the office for two days. I can't get one single day to my family.

I am going to show the ARDC this, I am going to show Judge Boyd when I ask for sanctions, and I will mention this in my review of your inappropriate behavior.

**You are an absolutely terrible human being** and I hope you and your loved ones have to endure the same harassment that I have undergone one day. (emphasis in original)

**ANSWER: Admit.**

56. Respondent's statement "You are an absolutely terrible human being and I hope you and your loved ones have to endure the same harassment that I have undergone one day" served no purpose other than to embarrass, delay, or burden Almanza.

**ANSWER: Deny.**

57. On October 30, 2023, Almanza filed a motion to compel Respondent to produce the client file and other specific documents Respondent purportedly filed or submitted on Williams' behalf in the divorce proceeding.

**ANSWER: Admit that Mark Almanza filed a motion to compel pertaining to the subpoena that did not appear to have been filed and was not properly served or noticed.**

58. On November 1, 2023, the court ordered Respondent and CFA to produce all documents requested by Almanza no later than November 22, 2023. The matter was set for status on compliance with the order by Respondent for November 28, 2023.

**ANSWER: Admit.**

59. On November 4, 2023, Respondent emailed Almanza a copy of his client file for Williams.

**ANSWER: Admit.**

60. On November 6, 2023, Respondent filed a motion to withdraw from the divorce proceeding.

**ANSWER: Admit.**

61. On November 13, 2023, Respondent filed a motion for sanctions against Almanza in the divorce proceeding based on Almanza's emails and conduct in requesting the production of documents from Respondent. The motion was scheduled for a remote hearing on November 14, 2023, at 10:30 a.m.

**ANSWER: Admit.**

62. On November 13, 2023, Respondent filed a second motion for sanctions against Almanza in the divorce proceeding based on Almanza's conduct related to the November 1 order.

**ANSWER: Admit.**

63. On November 14, 2023, the court ordered Respondent's motion to withdraw stricken as moot because he had no appearance on file. The court also ordered Respondent turn over the documents previously requested by Almanza no later than November 22, 2023, a date agreed to in open court by Respondent, including but not limited to, the body attachment order for the opposing party, all orders submitted relating to the July 14, 2023 hearing, and all emails relating to the submission of the body attachment and July 14, 2023, orders to the court.

**ANSWER: Respondent admits the first sentence. The second sentence is denied as this does not accurately reflect what was ordered by the court, and Mark Almanza included that language in the court order on his own accord without circulating the court order in**



**compliance with Cook County local court rules and refused to give the court order to the Respondent.**

64. On November 14, 2023, at 10:23 p.m., Respondent submitted a one-star review to Almanza's Avvo profile which said: "We hired Mark by recommendation but clearly he waa [sic] to inexperienced, emotional and did Not [sic] care about the seriousness of the case. He allowed the case to drag for years w/o filing any motions& [sic] was constantly inappropriate with his comments. If you or your loved one's life is hanging in the balance, Do Not Hire this man!! He will do a poor job & bail on you." The review was submitted by [info@chiattorney.com](mailto:info@chiattorney.com) and was associated with the IP address 185.217.168.115.

**ANSWER: Deny.**

65. The review submitted to Almanza's Avvo profile, as set forth in paragraph 64, above, was false because Respondent submitted the review, not a current, former, or prospective client of Almanza.

**ANSWER: Deny.**

66. Respondent knew the review submitted to Almanza's profile, as set forth in paragraph 64, above, was false at the time he submitted the review.

**ANSWER: Deny.**

67. Respondent's statements in his Avvo review of Almanza, as set forth in paragraph 64, above, served no purpose other than to embarrass, delay, or burden Almanza.

**ANSWER: Deny.**

68. On November 14, 2023, at 10:29 p.m., Respondent submitted a one-star review to Almanza's Avvo profile which said: "terrible service that lawyer stole my money and never helped me solve my case I do not recommend it. I wasted my time and he stole my money, and this man

has no professional ethics.” The review was submitted by admin@legaledge.app and was associated with the IP address 103.50.33.158.

**ANSWER: Deny.**

69. The review submitted to Almanza’s Avvo profile, as set forth in paragraph 68, above, was false because Respondent submitted the review, not a current, former, or prospective client of Almanza.

**ANSWER: Deny.**

70. Respondent knew the review submitted to Almanza’s Avvo profile, as set forth in paragraph 68, above, was false at the time he submitted the review.

**ANSWER: Deny.**

71. Respondent’s statements in his Avvo review of Almanza, as set forth in paragraph 68, above, served no purpose other than to embarrass, delay, or burden Almanza.

**ANSWER: Deny.**

72. On November 28, 2023, Respondent and Almanza appeared in the divorce proceeding for the status of Respondent’s compliance with the court’s November 14, 2023, order. On that date, Respondent advised the court that he had removed all negative online reviews he had posted against Almanza and Almanza Law, LLC.

**ANSWER: Admit.**

73. Respondent’s statement to the court on November 28, 2023, that he had removed all negative online reviews he had posted against Almanza was false because Respondent had not removed the one-star review he submitted, as set forth in paragraph 64, above.

**ANSWER: Deny.**

74. Respondent knew the statement he made to the court on November 28, 2023, as set forth in paragraph 72, above, was false when he made it.

**ANSWER: Deny.**

75. On January 6, 2024, at 1:36 a.m., Respondent submitted a one-star review to Almanza's Avvo profile which said: "This attorney has a short fuse and he doesn't earn the money he is paid. If I could leave him a zero star review. I would. He is a bad attorney." The review was submitted by pikeplaceinvestments@gmail.com and was associated with IP address 38.124.108.87.

**ANSWER: Deny.**

76. The review submitted to Almanza's Avvo profile, as set forth in paragraph 75, above, was false because Respondent submitted the review, not a current, former, or prospective client of Almanza.

**ANSWER: Deny.**

77. Respondent knew the review submitted to Almanza's Avvo profile, as set forth in paragraph 75, above, was false at the time he submitted the review.

**ANSWER: Deny.**

78. Respondent's statements in his Avvo review of Almanza, as set forth in paragraph 75, above, served no purpose other than to embarrass, delay, or burden Almanza.

**ANSWER: Deny.**

79. On January 12, 2024, Respondent emailed Almanza and stated, "Our office was unable to recover the emails from the clerk who had left. However, a copy of the order is attached here." Attached to that email was the July 14, 2023, attachment order that Respondent's clerk had purportedly emailed to the court.

**ANSWER: Admit.**

80. Respondent's statement that the July 14, 2023, attachment order enclosed with his January 12, 2024, email to Almanza was submitted electronically to the court was false because Respondent's law clerk did not email the attachment order to the court.

**ANSWER: Deny as Respondent's email does not state that the order was submitted electronically and instead indicates that he could not access the relevant emails.**

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

a. in representing a client, using means that have no substantial purpose other than to embarrass, delay, or burden a third person, by conduct including submitting a Google review of Almanza on October 18, 2023; submitting Avvo.com reviews of Almanza on October 20, 2023, November 14, 2023, and January 6, 2024; making the statements to Almanza that "you might be a complete idiot," "you are inappropriate, rude, and I hope you one day have to go through what I am experiencing now," and "you are an absolutely terrible human being and I hope you and your loved ones have to endure the same harassment that I have undergone one day," in violation of Rule 4.4(a) of the Illinois Rules of Professional Conduct (2010); and

b. conduct involving dishonesty, fraud, deceit, or misrepresentation by stating that Respondent's paralegal sent the July 14, 2023, body attachment order to the court and was told the email was received; stating that his law clerk was still working after 10:00 p.m. on the evening of October 20, 2023; advising the court that he had withdrawn all negative reviews of Almanza as of November 28, 2023; submitting false reviews purporting to have come from Almanza's clients to Almanza's profile on Avvo.com on October 20, 2023, November 14, 2023, and January 6, 2024; and stating that the body attachment order Respondent emailed Almanza on January 12, 2024, was previously submitted to the court electronically, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

**ANSWER: Deny.**

**COUNT III**

*(Failure to act with reasonable diligence, failure to keep a client reasonable informed, and dishonesty)*

82. Beginning in or about January 2021, Respondent was the owner and principal attorney of the law firm Chicago Family Attorneys, LLC, (“CFA”) in Chicago.

**ANSWER: Admit.**

83. On or about December 8, 2022, Shalimar Melonson (“Melonson”) and Respondent agreed that CFA would file and represent Melonson in an adult guardianship matter.

**ANSWER: Admit.**

84. On December 8, 2022, Melonson and Respondent entered into a representation agreement relating to the guardianship matter. The agreement provided that Melonson would initially pay a \$2,500 retainer and would be billed at an hourly rate of \$250 for all attorneys and \$175 for all non-attorney staff.

**ANSWER: Admit.**

85. On March 27, 2023, Respondent’s associate filed a petition to appoint Melonson as the guardian of Melonson’s mother in the Circuit Court of Cook County. The matter was docketed as case number 2023P002193 (“the guardianship proceeding”). At the time the petition was filed, an opening case management hearing was set for April 26, 2023, at 11:00 a.m.

**ANSWER: Respondent is unable to admit or deny because he lacks personal knowledge as to what was filed by the associate who was to represent Shalimar Stark Melonson.**

86. On April 26, 2023, Respondent, nor anyone from CFA, appeared on Melonson’s behalf in the guardianship proceeding. The Court continued the guardianship proceeding to May 18, 2023, at 11:00 a.m., and ordered the attorney of record and Melonson to appear on that date. A

copy of the order was mailed to Melonson by the Clerk of the Circuit Court.

**ANSWER: Respondent is unable to admit or deny because he lacks personal knowledge as to whether the associate appeared or not, but was informed that she did appear.**

87. On May 17, 2023, Melonson emailed Respondent and stated, in part:

“I need to connect and gather some information regarding the status of the case. I have a letter that came to my address referencing a zoom meeting and appearance with the courts scheduled for 05/18 at 11 am. Prior to receiving this, I reached out to [your associate] via email on 05/03 and I called several times and it leads to a voicemail to leave. I have no further instructions or insight for the zoom meeting or what to expect or be prepared for. I know your office is busy with a ton of obligations, but if I can get some communication for what is expected of me or where we are with things it would me most helpful.”

**ANSWER: Admit.**

88. On May 18, 2023, Respondent, nor anyone from CFA, appeared on Melonson’s behalf in the guardianship proceeding. The Court continued the guardianship proceeding to June 30, 2023, at 11:00 a.m. The Court’s order also stated that if the attorney of record and/or Melonson did not appear on that date, the petition would be dismissed for want of prosecution.

**ANSWER: Respondent is unable to admit or deny because he lacks personal knowledge as to whether the associate handling Shalimar Stark Melonson’s case appeared or not.**

89. On June 30, 2023, Respondent, nor anyone from CFA, appeared on Melonson’s behalf in the guardianship proceeding. The Court entered an order dismissing the guardianship petition due to the failure to appear on multiple court dates, the failure to effectuate service of summons, the failure to obtain and present a medical report in support of the petition, and the failure to provide notice to family members or obtain waivers of notice.

**ANSWER: Admit.**

90. On August 2, 2023, Melonson received an email from Respondent's law clerk requesting an electronic signature on a document entitled Motion to Vacate Order Entered June 30, 2023.

**ANSWER: Admit.**

91. At no time prior to August 2, 2023, had Respondent informed Melonson that her guardianship proceeding had been dismissed for want of prosecution due to Respondent's failure to appear.

**ANSWER: Deny.**

92. On August 7, 2023, at 8:14 a.m., Respondent sent an email to Melonson with the subject heading "Wrong Motion Sent," and stated, in part: "We sent you the wrong motion for verification. [...] I didn't see this before it went out. I apologize for the confusion."

**ANSWER: Admit.**

93. On August 7, 2023, at 11:24 a.m., Respondent, or someone at his direction, filed the Motion to Vacate Order Entered June 30, 2023, as referenced in paragraph 90, above. In the motion, Respondent made the following statement:

"This matter was originally filed on July 28, 2023, within 30 days of the entry of the Order dismissing the Petition for a Plenary Guardianship of a person with an alleged disability."

**ANSWER: Admit.**

94. Respondent's statement that the motion to vacate was originally filed on July 28, 2023, as set forth in paragraph 93, above, was false because Respondent, nor anyone at his direction, had filed the motion in the guardianship proceedings on July 28, 2023.

**ANSWER: Deny.**

95. Respondent knew his statement, as set forth in paragraph 93, above, was false when he made it.

**ANSWER: Deny.**

96. On August 7, 2023, Respondent, or someone at his direction, filed a notice of filing for the motion to vacate, as referenced in paragraph 93, above. At no time, did Respondent set the motion to vacate for a motion hearing.

**ANSWER: Admit. In further answering, the notice of filing was filed by staff of the firm in conjunction with a notice of motion for the motion to withdraw, which Respondent believed had contained a notice of motion for the motion to vacate. Respondent was unaware at the time that the motion to vacate was not set for a motion hearing.**

97. On August 7, 2023, at 1:09 p.m., Melonson emailed Respondent and stated, in part: “Want to run quickly by you a couple of questions in regard to the matter and the document asked to sign. 1. Was there a court date/appearance on June 30th that wasn’t attended?”

**ANSWER: Admit.**

98. On August 7, 2023, at 2:40 p.m., Respondent replied to Melonson’s email and stated, in part: “No, we just had court again in July.”

**ANSWER: Admit.**

99. Respondent’s statements that there was no court appearance on June 30, 2023, that went unattended and that CFA had attended court in July 2023, as set forth in paragraph 98, above, were false because CFA did not appear in the guardianship proceeding in July 2023 due to the dismissal entered on June 30, 2023, for CFA’s failure to appear.

**ANSWER: Admit that the statements were incorrect due to an inadvertent mistake. Deny that the statements were knowingly false.**



100. Respondent knew his statements as set forth in paragraph 98, above, were false when he made them.

**ANSWER: Deny.**

101. On August 22, 2023, Respondent emailed Melonson and stated, in part: “I appeared at your last status and the court didn’t enter the order so we filed the motions that have been drafted on your behalf instead of going back and forth with the court.”

**ANSWER: Admit.**

102. Respondent’s statements that he appeared at the last status hearing in the guardianship proceeding and that the court did not enter the order from that date, as set forth in paragraph 101, above, were false because Respondent, nor anyone from CFA, appeared for a status hearing in Melonson’s guardianship matter and no orders were submitted to the court.

**ANSWER: Admit that the statements were incorrect due to an inadvertent mistake. Deny that the statements were knowingly false.**

103. Respondent knew his statements as set forth in paragraph 101, above, were false when he made them.

**ANSWER: Deny as the statement made to Shalimar Stark Melonson was incorrect and was a matter of simple error due to another case in the same courtroom with very similar fact patterns and Respondent was responding as quickly as possible due to prior issues of communication with staff communication regarding the matter and all issues regarding the case had already been discussed with Shalimar Stark Melonson by phone.**

104. On September 9, 2023, Respondent filed a motion to withdraw from the guardianship proceeding and a notice of motion which scheduled the motion hearing for September 21, 2023, at 10:00 a.m.

**ANSWER: Admit.**

105. On September 21, 2023, Respondent, nor anyone from CFA, appeared in the guardianship proceeding. On that date, the Court entered an order finding that no one appeared on the motion to vacate between 10:00 a.m. to 3:30 p.m., and no courtesy copies or information was provided to the Court prior to the hearing, inconsistent with the Court's standing order. The Court ordered the motion to vacate stricken for want of prosecution and the June 30, 2023, order dismissing the petition to stand.

**ANSWER: Admit. In further answering, Shalimar Stark Melonson informed Respondent that she no longer wished to proceed with the guardianship matter and Respondent therefore did not appear so the matter would remain dismissed.**

106. At no time did Respondent inform Melonson that her guardianship proceeding had been dismissed for want of prosecution due to Respondent's failure to appear.

**ANSWER: Deny.**

107. 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 at scheduled court hearings on June 30, 2023, and September 21, 2023, failing to effectuate service of summons, failing to obtain and present a medical report in support of the petition, failing to provide notice to family members or obtain waivers of notice, and failing to notice the motion to vacate the June 30, 2023, dismissal for a hearing in Cook County case number 2023P002193, in violation of Rule 1.3 of the Illinois Rules of Professional Conduct (2010);

b. failing to keep a client reasonably informed about the status of a matter, by failing to advise Melonson that Cook County case number 2023P002193 was dismissed for want of prosecution on June 30, 2023, and failing to advise Melonson that on September 21, 2023, the court ordered the June 30, 2023, dismissal of her case to stand, in violation of Rule 1.4(a)(3) of the Illinois Rules of

Professional Conduct (2010);

c. knowingly making a false statement of fact or law to a tribunal by filing a motion to vacate a dismissal order in Cook County case number 2023P002193 which falsely stated the motion had been previously filed on July 28, 2023, in violation of Rule 3.3(a)(1) of the Illinois Rules of Professional Conduct (2010); and

d. conduct involving dishonesty, fraud, deceit, or misrepresentation by filing a motion to vacate a dismissal order in Cook County case number 2023P002193 which falsely stated the motion had been previously filed on July 28, 2023, and by falsely informing Melonson that the court appearance on June 30, 2023, was not missed; that CFA appeared in the guardianship proceeding in July 2023; that Respondent appeared at a status hearing in the guardianship matter; and that the court did not enter an order for the status hearing, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

**ANSWER: Deny.**

#### **COUNT IV**

*(Failure to act with reasonable diligence, failure to promptly comply with reasonable requests for information, failure to refund an unearned fee, and dishonesty)*

108. In or about late December 2022, Lyndera Williams (“Lyndera”) and Respondent agreed that CFA would represent Lyndera in a pending appeal of a decision made by the Department of Children and Family Services (“DCFS”), which was scheduled for a telephonic hearing on January 20, 2023.

**ANSWER: Admit.**

109. On January 2, 2023, Lyndera and Respondent entered into a representation agreement relating to the DCFS appeal. The agreement provided that Chicago Family Attorneys, LLC would receive a “non-refundable upfront flat fee total of \$3,500.00” and after the first month of service, Lyndera would be billed at an hourly rate of \$250 for all attorneys and \$150 for all non-attorney staff.

**ANSWER: Admit.**

110. On January 20, 2023, Respondent's associate appeared on behalf of Lyndera for the telephonic hearing and requested a continuance. The Administrative Law Judge granted the continuance, and set the appeal for a telephonic status hearing on March 7, 2023, at 4:00 p.m.

**ANSWER: Respondent is unable to admit or deny because he lacks personal knowledge as he was not on the telephone conference call and the associate appeared.**

111. On February 3, 2023, Lyndera emailed Respondent and requested an update on her case. Respondent replied to Lyndera and stated: "We have a status on the matter with them in March. We are using this time to gather the proper arguments and evidence to pursue this matter fully."

**ANSWER: Admit.**

112. On February 24, 2023, Lyndera emailed Respondent to ask what day and time in March that her case was set for. At no time did Respondent respond to Lyndera's February 24, 2023, email.

**ANSWER: Admit. In further answering, Respondent did not return an email as he believed that the staff responded to Lyndera Williams' phone calls and indicated that they were waiting for the order to be returned from the administrative hearing.**

113. On March 3, 2023, Lyndera emailed Respondent and asked for an update on her case, including when the next hearing would occur. At no time did Respondent respond to Lyndera's March 3, 2023, email.

**ANSWER: Admit. In further answering, Respondent did not return an email as he believed that the staff responded to Lyndera Williams' phone calls and indicated that they were waiting for the order to be returned from the administrative hearing.**

114. On March 7, 2023, Respondent, nor anyone from CFA, appeared for the 4:00 p.m. telephonic status in Lyndera's DCFS appeal. The Administrative Law Judge called Respondent for the scheduled 4:00 p.m. status three times and left a voicemail. On that date, the Administrative Law Judge entered an order dismissing the case, finding that Lyndera had abandoned her right to a service appeal based on Respondent's failure to appear without adequate cause and without requesting a rescheduling prior to the hearing.

**ANSWER: Respondent admits the first sentence. The second sentence is denied, as Respondent did not receive a phone call or voicemail.**

115. On March 10, 2023, Lyndera emailed Respondent and stated: "I called your office. Your voice-mail is not working. I'm not able to leave a message." At no time did Respondent respond to Lyndera's March 10, 2023, email.

**ANSWER: Admit. In further answering, Respondent did not return an email as he believed that the staff responded to Lyndera Williams' phone calls and indicated that they were waiting for the order to be returned from the administrative hearing.**

116. On March 31, 2023, Lyndera emailed Respondent and stated: "Would you PLEASE let me know what is going on with the hearing." At no time did Respondent respond to Lyndera's March 31, 2023, email.

**ANSWER: Admit. In further answering, Respondent did not return an email as he believed that the staff responded to Lyndera Williams' by phone indicating that an appeal needed to be filed.**

117. On April 10, 2023, Lyndera emailed Respondent and stated: "Please send update."

**ANSWER: Admit. In further answering over 20 emails were exchanged between Respondent and Lyndera in the same chain from April 8th, 2023 to April 10th, 2023.**

118. On April 20, 2023, Respondent emailed Lyndera and stated: “The appeal with the court has been filed and we have requested another hearing.”

**ANSWER: Admit. In further answering, over 20 emails were exchanged between Respondent and Lyndera in the same chain from April 8th, 2023 to April 10th, 2023.**

119. Respondent’s statement that an appeal had been filed with the court, as set forth in paragraph 118, above, was false because CFA had not filed an appeal on behalf of Lyndera.

**ANSWER: Deny that the statement was knowingly false. Admit that Respondent’s statement was incorrect. At the time, Respondent believed the statement to be accurate because he had directed an associate to file an appeal.**

120. Respondent knew his statement, as set forth in paragraph 118, above, was false when he made it.

**ANSWER: Deny.**

121. On April 28, 2023, Lyndera emailed Respondent and stated: “Have they set a date?” At no time did Respondent respond to Lyndera’s April 28, 2023, email.

**ANSWER: Respondent is unable to admit or deny due to lack of knowledge.**

122. On May 13, 2023, Lyndera emailed Respondent and stated: “Hi Aaron may I have an update.” At no time did Respondent respond to Lyndera’s May 13, 2023, email.

**ANSWER: Admit. In further answering, Respondent believed that the staff within his office responded to Lyndera Williams by phone.**

123. On May 23, 2023, Lyndera emailed Respondent and stated: “May I have an update please?” At no time did Respondent respond to Lyndera’s May 23, 2023, email.

**ANSWER: Admit. In further answering, Respondent believed that the staff within his office responded to Lyndera Williams by phone.**

124. On May 30, 2023, Lyndera emailed Respondent and stated: “Can you send any and all documents submitted to Cook County Circuit Court for my records please. Also, please send me an update on the case.”

**ANSWER: Admit.**

125. On May 30, 2023, Respondent emailed Lyndera and replied: “Yes. I’ll go ahead and send them later this afternoon when I am out of court. We are waiting for our hearing date at this time.”

**ANSWER: Admit.**

126. Respondent’s statement that he was waiting for a hearing date, as set forth in paragraph 125, above, was false because Respondent knew that there was no matter pending on Lyndera’s behalf in the Circuit Court of Cook County.

**ANSWER: Deny as Respondent believed that his associate had filed a pending matter.**

127. Respondent knew his statement as set forth in paragraph 125, above, was false when he made it.

**ANSWER: Deny.**

128. On June 3, 2023, Lyndera emailed Respondent that she was waiting for the documents.

**ANSWER: Admit.**

129. On June 15, 2023, Lyndera emailed Respondent and stated: “PLEASE send me copies of the documents submitted for the appeal. I’ve been waiting for over a week now. You stated you would send.”

**ANSWER: Admit.**

130. On June 15, 2023, Respondent emailed Lyndera and stated: “Yes. I will send everything over. I am still dealing with several issues, but I will try and get this over to you as soon as possible.”

**ANSWER: Admit.**

131. On June 29, 2023, Lyndera emailed Respondent and stated, in part: “What is the delay [regarding] the documents? I’m so trusting in your process. However, it shouldn’t be this difficult to obtain documentation. Please be upfront with me regarding this case.”

**ANSWER: Admit.**

132. On June 29, 2023, Respondent emailed Lyndera and stated: “I will have them over to you sometime today. I need to have our paralegal send everything over.”

**ANSWER: Admit.**

133. On July 10, 2023, after still not receiving copies of any documents filed on her behalf, Lyndera emailed Respondent and requested a refund.

**ANSWER: Admit.**

134. On July 10, 2023, Respondent emailed Lyndera and stated: “We have already filed your paperwork and I have already started working on your case. You are not entitled to a refund. You need to read your contract as you actually owe us money and I have not been compensated for the rest of the work for several months. I have been very patient with regard to the invoices that were sent out.”

**ANSWER: Admit.**

135. Respondent’s statements that CFA had filed paperwork on Lyndera’s behalf and that she had not paid invoices for several months of work, as set forth in paragraph 134, above, were false because Respondent knew CFA had not filed any paperwork on Lyndera’s behalf and



that CFA had not issued any invoices to her.

**ANSWER: Deny.**

136. Respondent knew his statements, as set forth in paragraph 134, above, were false when he made them.

**ANSWER: Deny.**

137. On July 11, 2023, the Administrator docketed an investigation against Respondent after receiving a report from Lyndera.

**ANSWER: Admit.**

138. On November 28, 2023, Respondent appeared remotely to give sworn testimony related to his representation of Lyndera. In his sworn statement testimony, Respondent represented that he would be issuing Lyndera a full refund. Respondent's sworn statement was continued to January 22, 2024.

**ANSWER: Admit.**

139. On January 22, 2024, Respondent appeared remotely to give continued sworn testimony.

**ANSWER: Admit.**

140. During the sworn statement, Respondent was asked the following questions and gave the following answers:

Q. So back in November when we discussed this case, you stated that [. . .] you would be refunding the full amount to Ms. Williams. So have you issued her a full refund?

A. Yeah. Yeah. I just sent it out last week, so . . .

Q. And what's the amount of that refund?

A. 3,500. Oh, wait, no. I think it might have actually been a little bit more because she had – What do you call it? I think there's like another fee in there. Whatever the full amount was. But I can go back and send a copy of whenever you guys need.

**ANSWER: Deny as a refund was issued, but was never cashed.**

141. Respondent's statements that he had issued Lyndera a full refund in January 2024, as set forth in paragraph 140, above, were false because Respondent had not issued Lyndera a refund.

**ANSWER: Deny.**

142. Respondent knew his statements, as set forth in paragraph 140, above, were false when he made them.

**ANSWER: Deny.**

143. 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 at the scheduled telephonic hearing on March 7, 2023, in Lyndera's DCFS appeal, in violation of Rule 1.3 of the Illinois Rules of Professional Conduct (2010);
- b. failing to promptly comply with reasonable requests for information, by conduct including failing to respond to Lyndera's emails regarding the status of her case, in violation of Rule 1.4(a)(4) of the Illinois Rules of Professional Conduct (2010);
- c. failure to surrender property to refund an unearned fee, by conduct including failing to refund any unearned portion of the \$3,500 fee that Lyndera Williams paid to Respondent in connection with his agreement to represent her in her DCFS appeal, in violation of Rule 1.16(d) of the Illinois Rules of Professional Conduct (2010);
- d. knowingly making a false statement of material fact in connection with a disciplinary proceeding, by conduct including making false statements in sworn testimony on January 22, 2024, as set forth in paragraph 140, above, during the Administrator's investigation of his conduct, in violation of Rule 8.1(a) of the Illinois Rules of Professional Conduct (2010); and

e. conduct involving dishonesty, fraud, deceit, or misrepresentation by conduct including, making false statements to Lyndera, as set forth in paragraphs 118, 125, and 134, above, and by making false statements in sworn testimony on January 22, 2024, as set forth in paragraph 140, above, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

**ANSWER: Deny.**

Respectfully submitted,

Aaron Trent Korson,  
Respondent

By: /s/ Stephanie Stewart  
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