

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

In the Matter of:

ILYAS ASMAL LAKADA,
Attorney-Respondent,
No. 6309500.

Commission No. 2026PR00042

COMPLAINT

Lea S. Gutierrez, Administrator of the Attorney Registration and Disciplinary Commission, by her attorneys, Richard Gleason and Matthew Lango, pursuant to Supreme Court Rule 753(b), complains of Respondent, Ilyas Asmal Lakada, who was licensed to practice law in Illinois on November 1, 2012, and alleges Respondent has engaged in the following conduct, which subjects him to discipline pursuant to Supreme Court Rule 770:

COUNT

(Submission of False Rental Assistance Application to State and City Housing Agencies)

1. At all times alleged in this complaint, Respondent was the sole owner and member of the firm Lakada Law Group, LLC (“Lakada Law Group”) located in Chicago, Illinois, with a practice focus primarily on real estate transactions and construction law.

2. In March 2020, the United States Congress passed the Coronavirus Aid, Relief, and Economic Security Act which allocated \$3.5 billion in Coronavirus relief funds to the State of Illinois to cover certain expenses. The Illinois General Assembly then allocated \$396 million in Coronavirus relief funds to the Illinois Housing Development Authority (“IHDA”) to be used to fund affordable housing grants, for the benefit of persons impacted by the COVID-19 public health

FILED
5/21/2026 10:19 AM
ARDC Clerk

emergency, for emergency rental assistance, emergency mortgage assistance, and subordinate financing.

3. IHDA developed the Emergency Rental Assistance Program (“ERA”) to support Illinois tenants unable to pay their rent due to a COVID-19-related loss of income. Tenants whose ERA applications were approved received a one-time grant of \$5,000, paid directly to their landlord, to cover missed rent payments dating back to March of 2020 and to prepay rent payments through December of 2020, or until the \$5,000 was exhausted, whichever came first. IHDA accepted ERA applications between August 10 through August 28, 2020.

4. In December 2020, the United States Congress passed the Consolidated Appropriations Act of 2021, which allocated \$25 billion for state and local government rental assistance programs. In March 2021, the United States Congress passed the American Rescue Act of 2021 (“ARPA”), which allocated \$21.6 billion for state and local government rental assistance programs. In May 2021, through the passage of the COVID-19 Federal Emergency Rental Assistance Program Act, the Illinois General Assembly provided additional guidance to advance funding to vulnerable Illinois residents and increased protections to those facing eviction.

5. In May 2021, IHDA launched the Illinois Rental Payment Program (“ILRPP”) to provide relief to renters and landlords who continued to experience financial hardships related to the COVID-19 Pandemic. “Round 1” of ILRPP utilized more than \$584 million in federal funding provided by the Consolidated Appropriations Act of 2021 and ARPA. Tenants whose ILRPP applications were approved received a grant of up to \$25,000, paid directly to their landlord, to cover missed rent payments dating back to June of 2020, and to prepay rent payments through August of 2021, or until the \$25,000 was exhausted, whichever came first. IHDA accepted

Respondent, or someone at his direction, prepared at least 57 false emergency rental assistance applications to IHDA and CDOH which sought over \$1 million in grants for the above properties. Each of these applications listed Respondent as the landlord or representative of the landlord for the property in question, and further provided Respondent's contact information.

10. The applications described in paragraph nine were false because, among other things, they falsely inflated the monthly rent Respondent or his relatives charged for the rental units, requested rental assistance for tenants that did not reside in the respective rental units, requested rental assistance for periods of time in which Respondent had received rent payments for the respective rental units, and/or included forged documents to support the false applications submitted to IHDA and CDOH.

11. Respondent knew the rental applications described in paragraph nine were false at the time he, or someone at his direction, submitted them, because Respondent was the owner and landlord of the properties in question. As the owner and landlord, Respondent knew that the applications sought inflated rents from what he actually charged for the rental units, knew that certain individuals named as tenants in the applications did not actually reside in those units, and knew that he received rent during periods of time that the applications claimed he had not received rent.

A. *6318 N Francisco, Unit 1 – Tenant A*

12. On or about August 11, 2020, Respondent, or someone at his direction, prepared and submitted an ERA application to IHDA on behalf of one of his tenants renting the 1st floor unit of 6318 N Francisco ("Tenant A"). In the application, Respondent, or someone at his direction, alleged that Tenant A owed Respondent \$5,400 in past-due rent dating back to March 1, 2020. In connection with Tenant A's ERA application, Respondent, or someone at his direction, prepared

landlord-initiated applications for ILRPP between May 17 through June 7, 2021, and tenant-initiated applications between June 28 through July 18, 2021.

6. Similarly, the Chicago Department of Housing (“CDOH”) launched its own Emergency Rental Assistance Program (“ERAP”) in May 2021 which utilized nearly \$80 million funded through the Consolidated Appropriations Act of 2021. The City’s ERAP provided eligible tenants up to 15 months of rental assistance or utility payment assistance. Tenants whose ERAP applications were approved received a one-time grant of rental assistance to match their specific need. CDOH accepted applications from landlords and tenants between May 24 through June 15, 2021.

7. In December 2021, IHDA launched “Round 2” of the ILRPP and utilized \$297 million in federal funding from ARPA. In “Round 2” of ILRPP, tenants whose applications were approved received a grant of up to \$25,000 to cover missed rent payments dating back to June 2020 and to prepay rent payments through April of 2022, or until the \$25,000 was exhausted, whichever came first. IHDA accepted applications for “Round 2” of ILRPP between December 6, 2021 and January 9, 2022.

8. In December 2021, CDOH launched “Round 2” of the ERAP and utilized \$102 million in federal funding from ARPA. In “Round 2”, tenants whose applications were approved could receive up to 15 months of missed rent and utility payments and up to three months of future rent and utility payments. CDOH accepted applications for round two of ERAP between December 6 and December 18, 2021.

9. Respondent and his relatives owned and operated rental properties at 6034 N Fairfield Avenue, 6318 N Francisco Avenue, 6220 Springfield Avenue, 6155 N Springfield Avenue, and 6140 N Kimball Avenue in Chicago. Between August 2020 and January 2022,

and submitted to IHDA a document titled “Landlord’s Five-Day Notice,” that was dated August 5, 2020. The document alleged that Tenant A had not paid Respondent \$1,350 in monthly rent from April 1, 2020 to July 31, 2020.

13. Respondent’s statements in the ERA application and the “Landlord’s Five-Day Notice” that Tenant A owed past-due rent of \$5,400 for the period of April through July 2020 were false, because Respondent received monthly rent payments in the amount of \$1,350 from Tenant A for at least May and July 2020.

14. Respondent knew when he, or someone at his direction, submitted the ERA application and supporting documentation to IHDA for Tenant A that the statements were false because Respondent was the owner and landlord for Unit 1 of 6318 N Francisco, and he knew that he had received rent payments in the amount of \$1,350 from Tenant A for at least May and July 2020.

B. *6318 N Francisco, Garden Unit – Tenant B*

15. On or about August 21, 2020, Respondent, or someone at his direction, prepared and submitted an ERA application to IHDA on behalf of one of his tenants renting the Garden Unit of 6318 N Francisco (“Tenant B”). The application alleged that Tenant B owed Respondent \$4,600 in past-due rent, dating back to March 1, 2020. In connection with Tenant B’s ERA application, Respondent, or someone at his direction, prepared and submitted to IHDA a document titled “Landlord’s Five-Day Notice” which was dated August 1, 2020. The document alleged that Tenant B had not paid Respondent \$1,150 in monthly rent from April 1, 2020 through July 31, 2020.

16. Respondent’s statements in the ERA application and the “Landlord’s Five-Day Notice” that Tenant B owed past-due rent of \$4,600 for the period of April through July 2020 were

false, because Respondent received monthly rent payments in the amount of \$1,150 from Tenant B for March 2020 through July 2020.

17. Respondent knew when he, or someone at his direction, submitted the ERA application and supporting documentation to IHDA for Tenant B that the statements were false because Respondent was the owner and landlord for the Garden Unit of 6318 N Francisco, and he knew that he had received rent payments in the amount of \$1,150 from Tenant B for March 2020 through July 2020.

C. *6034 N Fairfield, Unit 2F – Tenant C*

18. On or about May 19, 2021, Respondent, or someone at his direction, prepared and submitted an ILRPP application to IHDA on behalf of a tenant purportedly renting Unit 2F of 6034 N Fairfield (“Tenant C”). The application was assigned Application ID number 46669. In the application, Respondent, or someone at his direction, alleged that Tenant C owed Respondent \$22,800 in past-due rent from June 2020 through May 2021. In connection with Application 46669, Respondent, or someone at his direction, prepared and submitted to IHDA a rent ledger which alleged that Tenant G had not paid Respondent \$1,900 in monthly rent from June 2020 through May 2021.

19. Respondent’s statements in Application 46669 and the related rent ledger that Tenant C owed Respondent past-due rent of \$22,800 for the period of June 2020 through May 2021 were false. Respondent’s statements were false because Respondent only charged monthly rent of \$1,250 and later \$1,100 for Unit 2F of 6034 N Fairfield during that period, and not the \$1,900 he claimed to have charged in the application. Respondent’s statements were further false because Tenant C did not reside in Unit 2F from June 2020 through at least January 2021 as he claimed in the application. Respondent’s statements were also false because Respondent received

monthly rent payments for at least June 2020 through September 2020 and March 2021 through May 2021 from the respective tenants residing in Unit 2F during those periods.

20. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documentation to IHDA for Tenant C that the statements were false because Respondent was the owner and landlord for Unit 2F of 6034 N Fairfield, and he knew that he only charged monthly rent of 1,250 and later \$1,100 for Unit 2F of 6034 N Fairfield during the period of June 2020 through May 2021, and not the \$1,900 he claimed to have charged in the application. Respondent further knew the statements were false because he knew that Tenant C did not reside in Unit 2F from June 2020 through at least January 2021. Respondent also knew the statements were false because he knew that he had received rent payments for at least June 2020 through September 2020 and March 2021 through May 2021 from the respective tenants residing in Unit 2F during those periods.

21. On or about May 30, 2021, Respondent, or someone at his direction, prepared and submitted another ILRPP application to IHDA on behalf of Tenant C purportedly renting Unit 2F of 6034 N Fairfield. The application was assigned Application ID number 81361. In the application, Respondent, or someone at his direction, alleged that Tenant C owed Respondent \$22,800 in past-due rent from June 2020 through May 2021. In connection with Application 81361, Respondent, or someone at his direction, prepared and submitted to IHDA a rent ledger which alleged that Tenant C had not paid \$1,900 in monthly rent from June 2020 through May 2021.

22. Respondent's statements in Application 81361 and the related rent ledger that Tenant C owed past-due rent of \$22,800 for the period of June 2020 through May 2021 were false. Respondent's statements were false because Respondent only charged monthly rent of \$1,250 and

later \$1,100 for Unit 2F of 6034 N Fairfield during that period, and not the \$1,900 he claimed to have charged in the application. Respondent's statements were further false because Tenant C did not reside in Unit 2F from June 2020 through at least January 2021 as he claimed in the application. Respondent's statements were also false because Respondent received monthly rent payments for at least June 2020 through September 2020 and March 2021 through May 2021 from the respective tenants residing in Unit 2F during those periods.

23. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documentation to IHDA for Tenant C that the statements were false because Respondent was the owner and landlord for Unit 2F of 6034 N Fairfield, and he knew that he only charged monthly rent of 1,250 and later \$1,100 for Unit 2F of 6034 N Fairfield during the period of June 2020 through May 2021, and not the \$1,900 he claimed to have charged in the application. Respondent further knew the statements were false because he knew that Tenant C did not reside in Unit 2F from June 2020 through at least January 2021. Respondent also knew the statements were false because he knew that he had received rent payments for at least June 2020 through September 2020 and March 2021 through May 2021 from the respective tenants residing in Unit 2F during those periods.

D. *6034 N Fairfield, Unit 3F – Tenant D*

24. On or about May 19, 2021, Respondent, or someone at his direction, prepared and submitted an ILRPP application to IHDA on behalf of one of his tenants renting Unit 3F of 6034 N Fairfield ("Tenant D"). The application was assigned Application ID number 46914. In the application, Respondent, or someone at his direction, alleged that Tenant D owed Respondent \$22,800 in past-due rent from June 2020 through May 2021. In connection with Application 46914, Respondent, or someone at his direction, prepared and submitted to IDHA a rent ledger

which alleged that Tenant D had not paid Respondent \$1,900 in monthly rent from June 2020 through May 2021.

25. Respondent's statements in Application 46914 and the related rent ledger that Tenant D owed past-due rent of \$22,800 for the period of June 2020 through May 2021 were false. Respondent's statements were false because Respondent only charged monthly rent of \$1,100 for Unit 3F of 6034 N Fairfield during that period, and not the \$1,900 he claimed to have charged in the application. Respondent's statements were further false because he received monthly rent payments in the amount of \$1,100 for at least July 2020 through May 2021 from the tenant residing in Unit 3F during that period.

26. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documentation to IHDA for Tenant D that the statements were false because Respondent was the owner and landlord for Unit 3F of 6034 N Fairfield, and he knew that he only charged monthly rent of \$1,100 for Unit 3F of 6034 N Fairfield during the period of June 2020 through May 2021, and not the \$1,900 he claimed to have charged in the application. Respondent further knew the statements were false because he knew that he received monthly rent payments for at least July 2020 through May 2021 from the tenant residing in Unit 3F during that period.

27. On or about May 21, 2021, Respondent, or someone at his direction, prepared and submitted another ILRPP application to IHDA on behalf of Tenant D for Unit 3F of 6034 N Fairfield. The ILRPP application was assigned Application ID number 46822. In the application, Respondent, or someone at his direction, alleged that Tenant D owed Respondent \$22,800 in past-due rent from June 2020 through May 2021. In connection Application 46822, Respondent, or

someone at his direction, prepared and submitted to IDHA a rent ledger which alleged that Tenant D had not paid Respondent \$1,900 in monthly rent from June 2020 through May 2021.

28. Respondent's statements in Application 46822 and the related rent ledger that Tenant D owed past-due rent of \$22,800 for the period of June 2020 through May 2021 were false. Respondent's statements were false because Respondent only charged monthly rent of \$1,100 for Unit 3F of 6034 N Fairfield during that period, and not the \$1,900 he claimed in the application. Respondent's statements were further false because Respondent received monthly rent payments in the amount of \$1,100 for at least July 2020 through May 2021 from the tenant residing in Unit 3F during that period.

29. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documentation to IHDA for Tenant D that the statements were false because Respondent was the owner and landlord for Unit 3F of 6034 N Fairfield, and he knew that he only charged monthly rent of \$1,100 for Unit 3F of 6034 N Fairfield during the period of June 2020 through May 2021, and not the \$1,900 he claimed to have charged in the application. Respondent further knew the statements were false because he knew that he received monthly rent payments for at least July 2020 through May 2021 from the tenant residing in Unit 3F during that period.

30. On or about May 30, 2021, Respondent, or someone at his direction, prepared and submitted another ILRPP application to IHDA on behalf of Tenant D for Unit 3F of 6034 N Fairfield. The application was assigned Application ID number 81362. In the application, Respondent, or someone at his direction, alleged that Tenant D owed Respondent \$22,800 in past-due rent from June 2020 through May 2021. In connection with Application 81362, Respondent,

or someone at his direction, prepared and submitted to IHDA a rent ledger which alleged that Tenant D had not paid \$1,900 in monthly rent from June 2020 through May 2021.

31. Respondent's statements in Application 81362 and the related rent ledger that Tenant D owed past-due rent of \$22,800 for the period of June 2020 through May 2021 were false. Respondent's statements were false because Respondent only charged monthly rent of \$1,100 for Unit 3F of 6034 N Fairfield during that period, and not the \$1,900 he claimed in the application. Respondent's statements were further false because Respondent received monthly rent payments in the amount of \$1,100 for at least July 2020 through May 2021 from the tenant residing in Unit 3F during that period.

32. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documentation to IHDA for Tenant D that the statements were false because Respondent was the owner and landlord for Unit 3F of 6034 N Fairfield, and he knew that he only charged monthly rent of \$1,100 for Unit 3F of 6034 N Fairfield during the period of June 2020 through May 2021, and not the \$1,900 he claimed to have charged in the application. Respondent further knew the statements were false because he knew that he received monthly rent payments for at least July 2020 through May 2021 from the tenant residing in Unit 3F during that period.

E. *6034 N Fairfield, Unit 2R – Tenant E*

33. On or about May 19, 2021, Respondent, or someone at his direction, prepared and submitted an ILRPP application to IHDA on behalf of a tenant renting Unit 2R of 6034 N Fairfield ("Tenant E"). The ILRPP application was assigned Application ID number 47566. In the application, Respondent, or someone at his direction, alleged that Tenant E owed Respondent \$21,000 in past-due rent from June 2020 through May 2021. In connection with Application

47566, Respondent, or someone at his direction, prepared and submitted to IHDA a rent ledger which alleged that Tenant E had not paid Respondent \$1,750 in monthly rent from June 2020 through May 2021.

34. Respondent's statements in Application 47566 and the related rent ledger that Tenant E owed Respondent past-due rent of \$21,000 for the period of June 2020 through May 2021 were false. Respondent's statements were false because Respondent only charged monthly rent of \$925 and later \$975 for Unit 2R of 6034 N Fairfield during that period, and not the \$1,750 he claimed to have charged in the application. Respondent's statements were further false because Respondent received monthly rent payments from Tenant E for at least September 2020 through December 2020 and April 2021 through May 2021.

35. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documentation to IHDA for Tenant E that the statements were false because Respondent was the owner and landlord for Unit 2R of 6034 N Fairfield, and he knew that he only charged monthly rent of \$925 and later \$975 for Unit 2R of 6034 N Fairfield during the period of June 2020 through May 2021, and not the \$1,750 he claimed to have charged in the application. Respondent's further knew his statements were false because he knew that he had received monthly rent payments from Tenant E for at least September 2020 through December 2020 and April 2021 through May 2021.

36. On or about May 19, 2021, Respondent, or someone at his direction, prepared and submitted another ILRPP application to IHDA on behalf of Tenant E for Unit 2R of 6034 N Fairfield. The application was assigned Application ID number 81366. In the application Respondent, or someone at his direction, alleged that Tenant E owed Respondent \$21,000 in past-due rent from June 2020 through May 2021. In connection with Application 81366, Respondent,

or someone at his direction, prepared and submitted to IHDA a rent ledger which alleged that Tenant E had not paid \$1,750 in monthly rent from June 2020 through May 2021.

37. Respondent's statements in Application 81366 and the related rent ledger that Tenant E owed past-due rent of \$21,000 for the period of June 2020 through May 2021 were false. Respondent's statements were false because Respondent only charged monthly rent of \$925 and later \$975 for Unit 2R of 6034 N Fairfield, during that period, and not the \$1,750 he claimed to have charged in the application. Respondent's statements were further false because Respondent received monthly rent payments from Tenant E for at least September 2020 through December 2020 and April 2021 through May 2021.

38. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documentation to IHDA for Tenant E that the statements were false because Respondent was the owner and landlord for Unit 2R of 6034 N Fairfield, and he knew that he only charged monthly rent of \$925 and later \$975 for Unit 2R of 6034 N Fairfield during the period of June 2020 through May 2021, and not the \$1,750 he claimed to have charged in the application. Respondent further knew his statements were false because he knew that he had received monthly rent payments from Tenant E for at least September 2020 through December 2020 and April 2021 through May 2021.

39. In December 2021, Respondent, or someone at his direction, prepared and submitted an ERAP application to CDOH on behalf of Tenant E for Unit 2R of 6034 N Fairfield. The application was assigned Application ID number 959860. In the application, Respondent, or someone at his direction, alleged that Tenant E owed Respondent \$26,250 in past-due rent from October 2020 through December 2021. In connection with Application 959860, Respondent, or

someone at his direction, prepared and submitted to CDOH a rent ledger which alleged that Tenant E had not paid \$1,750 in monthly rent from October 2020 through December 2021.

40. Respondent's statements in Application 959860 and the related rent ledger that Tenant E owed past-due rent of \$26,250 for the period of October 2020 through December 2021 were false. Respondent's statements were false because Respondent only charged monthly rent of \$925 and later \$975 for Unit 2R of 6034 N Fairfield, during that period, and not the \$1,750 he claimed to have charged in the application. Respondent's statements were further false because Respondent received monthly rent payments from Tenant E for at least October 2020 through December 2020 and April 2021 through May 2021.

41. Respondent knew when he, or someone at his direction, submitted the ERAP application and supporting documentation to CDOH for Tenant E that the statements were false because Respondent was the owner and landlord of Unit 2R of 6034 N Fairfield, and he knew that he only charged monthly rent of \$925 and later \$975 for Unit 2R of 6034 N Fairfield during the period of October 2020 through December 2021, and not the \$1,750 he claimed to have charged in the application. Respondent further knew the statements were false because Respondent received monthly rent payments from Tenant E for at least October 2020 through December 2020 and April 2021 through May 2021.

42. On or about January 9, 2022, Respondent, or someone at his direction, prepared and submitted another ILRPP application to IHDA on behalf of Tenant E for Unit 2R of 6034 N Fairfield. The application was assigned Application ID number 979072. In the application, Respondent, or someone at his direction, alleged that Tenant E owed Respondent \$15,350 in past-due rent from August 2020 through December 2021. In connection with ILRPP application 979072, Respondent, or someone at his direction, prepared and submitted a rent ledger which

alleged that Tenant E had not paid \$550 in rent due for August 2020 and \$925 in monthly rent from September 2020 through December 2021.

43. Respondent's statements in Application 979072 and the related rent ledger that Tenant E owed past-due rent of \$15,350 for the period of August 2020 through December 2021 were false. Respondent's statements were false because Respondent received monthly rent payments from Tenant E for at least September 2020 through December 2020 and April 2021 through December 2021.

44. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documentation to IHDA for Tenant E that the statements were false because Respondent was the owner and landlord for Unit 2R of 6034 N Fairfield, and he knew that he received monthly rent payments from Tenant E for at least September 2020 through December 2020 and April 2021 through December 2021.

F. *6034 N Fairfield, Unit 3F – Tenant F*

45. On or about May 20, 2021, Respondent, or someone at his direction, prepared and submitted an ILRPP application to IHDA on behalf of one of his tenants renting Unit 3F of 6034 N Fairfield ("Tenant F"). The application was assigned Application ID number 53491. In the application, Respondent, or someone at his direction, alleged that Tenant F owed Respondent \$21,000 in past-due rent from June 2020 through May 2021. In connection with Application 53491, Respondent, or someone at his direction, prepared and submitted to IHDA a rent ledger which alleged that Tenant F had not paid \$1,750 in monthly rent from June 2020 through May 2021.

46. Respondent's statements in Application 53491 and the related rent ledger that Tenant F owed past-due rent of \$21,000 for the period of June 2020 through May 2021 were false.

Respondent's statements were false because Respondent only charged monthly rent of \$850 and later \$900 for Unit 3F of 6034 N Fairfield during that period, and not the \$1,750 he claimed to have charged in the application. Respondent's statements were further false because he received monthly rent payments from Tenant F for at least June 2020 through December 2020.

47. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documentation to IHDA for Tenant F that the statements were false because Respondent was the owner and landlord for Unit 3F of 6034 N Fairfield, and he knew that he only charged monthly rent of \$850 and later \$900 for Unit 3F of 6034 N Fairfield during the period of June 2020 through May 2021, and not the \$1,750 he claimed to have charged in the application. Respondent further knew the statements were false because he knew he received monthly rent payments from Tenant F for at least June 2020 through December 2020.

48. On or about May 21, 2021, Respondent, or someone at his direction, prepared and submitted another ILRPP application to IHDA on behalf of Tenant F for Unit 3F of 6034 N Fairfield. The application was assigned Application ID number 47623. In the application, Respondent, or someone at his direction, alleged that Tenant F owed Respondent \$21,000 in past-due rent from June 2020 through May 2021. In connection with Application 47623, Respondent, or someone at his direction, prepared and submitted to IHDA a rent ledger which alleged that Tenant F had not paid \$1,750 in monthly rent from June 2020 through May 2021.

49. Respondent's statements in Application 47623 and the related rent ledger that Tenant F owed past-due rent of \$21,000 for the period of June 2020 through May 2021 were false. Respondent's statements were false because he only charged monthly rent of \$850 and later \$900 for Unit 3F of 6034 N Fairfield, during that period, and not the \$1,750 he claimed to have charged

in the application. Respondent's statements were further false because he received monthly rent payments from Tenant F for at least June 2020 through December 2020.

50. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documentation to IHDA for Tenant F that the statements were false because Respondent was the owner and landlord for Unit 3F of 6034 N Fairfield, and he knew that he only charged monthly rent of \$850 and later \$900 for Unit 3F of 6034 N Fairfield during the period of June 2020 through May 2021, and not the \$1,750 he claimed to have charged in the application. Respondent further knew the statements were false because he knew he received monthly rent payments from Tenant F for at least June 2020 through December 2020.

51. On or about May 30, 2021, Respondent, or someone at his direction, prepared and submitted another ILRPP application to IHDA on behalf of Tenant F for Unit 3F of 6034 N Fairfield. The application was assigned Application ID number 81368. In the application, Respondent, or someone at his direction, alleged that Tenant F owed Respondent \$21,000 in past-due rent from June 2020 through May 2021. In connection with Application 81368, Respondent, or someone at his direction, prepared and submitted to IHDA a rent ledger which alleged that Tenant F had not paid \$1,750 in monthly rent from June 2020 through May 2021.

52. Respondent's statements in Application 81368 and the related rent ledger that Tenant F owed past-due rent of \$21,000 for the period of June 2020 through May 2021 were false. Respondent's statements were false because Respondent only charged monthly rent of \$850 and later \$900 for Unit 3F of 6034 N Fairfield during that period, and not the \$1,750 he claimed to have charged in the application. Respondent's statements were further false because he received monthly rent payments from Tenant F for at least June 2020 through December 2020.

53. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documentation to IHDA for Tenant F that the statements were false because Respondent was the owner and landlord for Unit 3F of 6034 N Fairfield, and he knew that he only charged monthly rent of \$850 and later \$900 for Unit 3F of 6034 N Fairfield during the period of June 2020 through May 2021, and not the \$1,750 he claimed to have charged in the application. Respondent further knew the statements were false because he knew he received monthly rent payments from Tenant F for at least June 2020 through December 2020.

54. In December 2021, Respondent, or someone at his direction, prepared and submitted an ERAP application to CDOH on behalf of Tenant F for Unit 3F of 6034 N Fairfield. The application was assigned Application ID number 958595. In the application, Respondent, or someone at his direction, alleged that Tenant F owed Respondent \$35,000 in past-due rent from May 2020 through December 2021. In connection with Application 958595, Respondent, or someone at his direction, prepared and submitted to CDOH a rent ledger which alleged that Tenant F had not paid \$1,750 in monthly rent from May 2020 through December 2021.

55. Respondent's statements in Application 958595 and the related rent ledger that Tenant F owed past-due rent of \$35,000 for the period of May 2020 through December 2021 were false. Respondent's statements were false because Respondent only charged monthly rent of \$850 and later \$900 for Unit 3F of 6034 N Fairfield during that period, and not the \$1,750 that he claimed to have charged in the application. Respondent's statements were further false because Respondent received monthly rent payments from Tenant F for at least May 2020 through December 2020 and June 2021 through December 2021.

56. Respondent knew when he, or someone at his direction, submitted the ERAP application and supporting documentation to CDOH for Tenant F that the statements were false

because Respondent was the owner and landlord of Unit 3F of 6034 N Fairfield, and he knew that he only charged monthly rent of \$850 and later \$900 for Unit 3F of 6034 N Fairfield during the period of May 2020 through December 2021, and not the \$1,750 that he claimed to have charged in the application. Respondent further knew the statements were false because he knew that he received monthly rent payments from Tenant F for at least May 2020 through December 2020 and June 2021 through December 2021.

57. On or about January 8, 2022, Respondent, or someone at his direction, prepared and submitted another ILRPP application to IHDA on behalf of Tenant F for Unit 3F of 6034 N Fairfield. The application was assigned Application ID number 964145. In the application, Respondent, or someone at his direction, alleged that Tenant F owed Respondent \$33,250 in past-due rent from June 2020 through December 2021.

58. Respondent's statements in Application 964145 that Tenant F owed past-due rent of \$33,250 for the period of June 2020 through December 2021 were false. Respondent's statements were false because Respondent only charged monthly rent of \$850 and later \$900 for Unit 3F of 6034 N Fairfield during that period, and not the \$1,750 he claimed to have charged in the application. Respondent's statements were further false because he received monthly rent payments from Tenant F for at least June 2020 through December 2020 and June 2021 through March 2022.

59. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documentation to IHDA for Tenant F that the statements were false because Respondent was the owner and landlord for Unit 3F of 6034 N Fairfield, and he knew that he only charged monthly rent of \$850 and later \$900 for Unit 3F of 6034 N Fairfield during the period of June 2020 through December 2021, and not the \$1,750 that he claimed to have charged

in the application. Respondent further knew the statements were false because he knew that he received monthly rent payments from Tenant F for at least June 2020 through December 2020 and June 2021 through December 2021.

G. *6034 N Fairfield, Garden Unit - Tenant G*

60. On or about May 20, 2021, Respondent, or someone at his direction, prepared and submitted an ILRPP application to IHDA on behalf of one of his tenants renting the Garden Unit of 6034 N Fairfield (“Tenant G”). The application was assigned Application ID number 53536. In the application, Respondent, or someone at his direction, alleged that Tenant G owed Respondent \$22,680 in past-due rent from June 2020 through May 2021. In connection with Application 53536, Respondent, or someone at his direction, prepared and submitted to IHDA a rent ledger which alleged that Tenant G had not paid \$1,890 in monthly rent from June 2020 through May 2021.

61. Respondent’s statements in Application 53536 and the related rent ledger that Tenant G owed past-due rent of \$22,680 for the period of June 2020 through May 2021 were false. Respondent’s statements were false because Respondent only charged monthly rent of \$1,100 and later \$1,235 for the Garden Unit of 6034 N Fairfield during that period, and not the \$1,890 he claimed to have charged in the application. Respondent’s statements were further false because Respondent received monthly rent payments from Tenant G for at least June 2020 through January 2021, May 2021, and August 2021 through October 2021.

62. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documents to IHDA for Tenant G that the statements were false because Respondent was the owner and landlord for the Garden Unit of 6034 N Fairfield, and he knew that he only charged monthly rent of \$1,100 and later \$1,235 for the Gaden Unit of 6034 N

Fairfield during the period of June 2020 through May 2021. Respondent further knew the statements were false because he knew that he received monthly rent payments from Tenant G for at least June 2020 through January 2021, May 2021, and August 2021 through October 2021.

63. On or about January 8, 2022, Respondent, or someone at his direction, prepared and submitted another ILRPP application to IHDA on behalf of Tenant G for the Garden Unit of 6034 N Fairfield. The application was assigned Application ID number 975829. In the application, Respondent, or someone at his direction, alleged that Tenant G owed Respondent \$37,800 in past-due rent from June 2020 through January 2022. In connection with Application 975829, Respondent, or someone at his direction, prepared and submitted to IHDA a rent ledger which alleged that Tenant G had not paid \$1,890 in monthly rent from June 2020 through January 2022.

64. Respondent's statements in Application 975829 and the related rent ledger that Tenant G owed past-due rent of \$37,800 for the period of June 2020 through January 2022 were false. Respondent's statements were false because Respondent only charged monthly rent of \$1,100 and later \$1,235 for the Garden Unit of 6034 N Fairfield during that period, and not the \$1,890 that he claimed to have charged in the application. Respondent's statements were further false because Respondent received monthly rent payments from Tenant G for at least June 2020 through January 2021, May 2021, and August 2021 through October 2021.

65. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documentation to IHDA for Tenant G that the statements were false because Respondent was the owner and landlord for the Garden Unit of 6034 N Fairfield, and he knew that he only charged monthly rent of \$1,100 and later \$1,235 for the Garden Unit of 6034 N Fairfield during the period of June 2020 through January 2022. Respondent further knew the

statements were false because he knew that he received monthly rent payments from Tenant G for at least June 2020 through January 2021, May 2021, and August 2021 through October 2021.

H. *6318 N Francisco, Unit 1 – Tenant H*

66. On or about May 21, 2021, Respondent, or someone at his direction, prepared and submitted an ILRPP application to IHDA on behalf of a tenant renting Unit 1 of 6318 N Francisco (“Tenant H”). The application was assigned Application ID number 53652. In the application, Respondent, or someone at his direction, alleged that Tenant H owed Respondent \$24,000 in past-due rent from June 2020 and May 2021. In connection with Application 53652, Respondent, or someone at his direction, prepared and submitted to IHDA a rent ledger which alleged that Tenant H had not paid \$2,000 in monthly rent from June 2020 through May 2021.

67. Respondent’s statements in Application 53652 and the related rent ledger that Tenant H owed past-due rent of \$24,000 for the period of June 2020 through May 2021 were false. Respondent’s statements were false because Respondent only charged monthly rent of \$1,350 for Unit 1 of 6318 N Francisco during that period, and not the \$2,000 he claimed to have charged in the application. Respondent’s statements were further false because Respondent received monthly rent payments from Tenant H for at least June 2020 through October 2020.

68. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documentation to IHDA for Tenant H that the statements were false because Respondent was the owner and landlord for Unit 1 of 6318 N Francisco, and he knew that he only charged monthly rent of \$1,350 for Unit 1 of 6318 N Francisco during the period of June 2020 through May 2021, and not the \$2,000 he claimed to have charged in the application. Respondent further knew the statements were false because he knew that he had received monthly rent payments from Tenant H for at least June 2020 through October 2020.

69. On or about May 29, 2021, Respondent, or someone at his direction, prepared and submitted another ILRPP application to IHDA on behalf of Tenant H for Unit 1 of 6318 N Francisco. The application was assigned Application ID number 80059. In the application, Respondent, or someone at his direction, alleged that Tenant H owed Respondent \$24,000 in past-due rent from June 2020 through May 2021. In connection with Application 80059, Respondent, or someone at his direction, prepared and submitted to IHDA a rent ledger which alleged that Tenant H had not paid \$2,000 in monthly rent from June 2020 through May 2021.

70. Respondent's statements in Application 80059 and the related rent ledger that Tenant H owed past-due rent of \$24,000 for the period of June 2020 through May 2021 were false. Respondent's statements were false because Respondent only charged monthly rent of \$1,350 for Unit 1 of 6318 N Francisco during that period, and not the \$2,000 he claimed to have charged in the application. Respondent's statements were further false because Respondent received monthly rent payments from Tenant H for at least June 2020 through October 2020.

71. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documentation to IHDA for Tenant H that the statements were false because Respondent was the owner and landlord for Unit 1 of 6318 N Francisco, and he knew that he only charged monthly rent of \$1,350 for Unit 1 of 6318 N Francisco during the period of June 2020 through May 2021, and not the \$2,000 he claimed to have charged in the application. Respondent further knew the statements were false because he knew that he had received monthly rent payments from Tenant H for at least June 2020 through October 2020.

72. In December 2021, Respondent, or someone at his direction, prepared and submitted an ERAP application to CDOH on behalf of Tenant H for Unit 1 of 6318 N Francisco. The application was assigned Application ID number 958546. In the application, Respondent, or

someone at his direction, alleged that Tenant H owed Respondent \$40,000 in past-due rent from May 2020 and December 2021. In connection with Application 958546, Respondent, or someone at his direction, prepared and submitted to CDOH a rent ledger which alleged that Tenant H had not paid \$2,000 in monthly rent from May 2020 through December 2021.

73. Respondent's statements in Application 958546 and the related rent ledger that Tenant H owed past-due rent of \$40,000 for the period of May 2020 through December 2021 were false. Respondent's statements were false because Respondent only charged monthly rent of \$1,350 for Unit 1 of 6318 N Francisco during that period, and not the \$2,000 he claimed to have charged in the application. Respondent's statements are further false because Respondent received monthly rent payments from Tenant H for at least May 2020 through October 2020.

74. Respondent knew when he, or someone at his direction, submitted the ERAP application and supporting documentation to CDOH for Tenant H that the statements were false because Respondent was the owner and landlord for Unit 1 of 6318 N Francisco, and he knew that he only charged monthly rent of \$1,350 for Unit 1 of 6318 N Francisco during the period of June 2020 through December 2021, and not the \$2,000 he claimed to have charged in the application. Respondent further knew the statements were false because he knew that he had received monthly rent payments from Tenant H for at least June 2020 through October 2020.

75. On or about January 9, 2022, Respondent, or someone at his direction, prepared and submitted another ILRPP application to IHDA on behalf of Tenant H for Unit 1 of 6318 N Francisco. The application was assigned Application ID number 980454. In the application, Respondent, or someone at this direction, alleged that Tenant H owed Respondent \$38,000 in past-due rent from June 2020 through December 2021. In connection with Application 980454, Respondent, or someone at his direction, prepared and submitted to IHDA a rent ledger which

alleged that Tenant H had not paid \$2,000 in monthly rent from June 2020 through December 2021.

76. Respondent's statements in Application 980454 and the related rent ledger that Tenant H owed past-due rent of \$38,000 for the period of June 2020 through December 2021 were false. Respondent's statements were false because Respondent only charged monthly rent of \$1,350 for Unit 1 of 6318 N Francisco during that period, and not the \$2,000 he claimed to have charged in the application. Respondent's statements were further false because Respondent received monthly rent payments from Tenant H for at least June 2020 through October 2020.

77. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documentation to IHDA for Tenant H that the statements were false because Respondent was the owner and landlord for Unit 1 of 6318 N Francisco, and he knew that he only charged monthly rent of \$1,350 for Unit 1 of 6318 N Francisco during the period of June 2020 through December 2021, and not the \$2,000 he claimed to have charged in the application. Respondent further knew the statements were false because he knew that he had received monthly rent payments from Tenant H for at least June 2020 through October 2020.

I. *6155 N Springfield – Tenant I*

78. On or about May 21, 2021, Respondent, or someone at his direction, prepared and submitted an ILRPP application to IHDA on behalf of a tenant purportedly renting 6155 N Springfield ("Tenant I"). The application was assigned Application ID number 58011. In the application, Respondent, or someone at his direction, alleged that Tenant I owed Respondent \$27,000 in past-due rent from June 2020 through May 2021. In connection with Application 58011, Respondent, or someone at his direction, prepared and submitted to IHDA a rent ledger

80047. In the application, Respondent, or someone at his direction, alleged that Tenant J owed Respondent \$19,200 in past-due rent from June 2020 through May 2021. In connection with the Application 80047, Respondent, or someone at his direction, prepared and submitted to IHDA a rent ledger which alleged that Tenant J had not paid \$1,600 in monthly rent from June 2020 through May 2021.

82. Respondent's statements in ILRPP application 80047 and the related rent ledger that Tenant J owed past-due rent of \$19,200 for the period of June 2020 through May 2021 were false. Respondent's statements were false because Respondent only charged monthly rent of \$1,150 for the Basement Unit of 6318 N Francisco during that period, and not the \$1,600 he claimed to have charged in the application. Respondent's statements were further false because Tenant J did not reside in the Basement Unit of 6318 N Francisco. Respondent's statements were also false because Respondent received monthly rent payments from the tenant residing in the Basement Unit of 6318 N Francisco for at least June 2020 through October 2020.

83. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documentation to IHDA for Tenant J that the statements were false because Respondent was the owner and landlord for the Basement Unit of 6318 N Francisco, and he knew that he only charged monthly rent of \$1,150 for the Basement Unit of 6318 N Francisco during the period of June 2020 through May 2021, and not the \$1,600 he claimed to have charged in the application. Respondent further knew the statements were false because he knew that Tenant J did not reside in the Basement Unit of 6318 N Francisco. Respondent also knew the statements were false because he knew that he had received monthly rent payments from the tenant residing in the Basement Unit of 6318 N Francisco for at least June 2020 through October 2020.

which alleged that Tenant I had not paid \$2,250 in monthly rent from June 2020 through May 2021.

79. Respondent's statements in Application 58011 and the related rent ledger that Tenant I owed past-due rent of \$27,000 for the period of June 2020 through May 2021 were false. Respondent's statements were false because Respondent only charged monthly rent of \$2,050 for 6155 N Springfield during that period, and not the \$2,250 he claimed to have charged in the application. Respondent's statements were further false because Tenant I did not reside at 6155 N Springfield. Respondent's statements were also false because Respondent received monthly rent payments from the tenant residing at 6155 N Springfield for at least June 2020 through January 2021.

80. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documentation to IHDA for Tenant I that the statements were false because Respondent was the owner and landlord of 6155 N Springfield, and he knew that he only charged monthly rent of \$20,050 for 6155 N Springfield during June 2020 through May 2021, and not the \$2,250 he claimed to have charged in the application. Respondent further knew the statements were false because he knew that Tenant I did not reside at 6155 N Springfield. Respondent also knew the statements were false because he knew that he had received monthly rent payments from the tenant residing at 6155 N Springfield for at last June 2020 through January 2021.

J. *6318 N Francisco, Basement Unit – Tenant J*

81. On or about May 29, 2021, Respondent, or someone at his direction, prepared and submitted an ILRPP application to IHDA on behalf of a tenant purportedly renting the Basement Unit of 6318 N Francisco ("Tenant J"). The application was assigned Application ID number

84. On or about May 29, 2021, Respondent, or someone at his direction, prepared and submitted another ILRPP application to IHDA on behalf of Tenant J for the Basement Unit of 6318 N Francisco. The application was assigned Application ID number 81229. In the application, Respondent, or someone at his direction, alleged that Tenant J owed Respondent \$19,200 in past-due rent from June 2020 through May 2021. In connection with Application 81229, Respondent, or someone at his direction, prepared and submitted to IHDA a rent ledger which alleged that Tenant J had not paid \$1,600 in monthly rent from June 2020 through May 2021.

85. Respondent's statements in Application 81229 and the related rent ledger that Tenant J owed past-due rent of \$19,200 for the period of June 2020 through May 2021 were false. Respondent's statements were false because Respondent only charged monthly rent of \$1,150 for the Basement Unit of 6318 N Francisco during that period, and not the \$1,600 he claimed to have charged in the application. Respondent's statements were further false because Tenant J did not reside in the Basement Unit of 6318 N Francisco. Respondent's statements were also false because Respondent received monthly rent payments from the tenant residing at the Basement Unit of 6318 N Francisco for at least June 2020 through October 2020.

86. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documentation to IHDA for Tenant J that the statements were false because Respondent was the owner and landlord for the Basement Unit of 6318 N Francisco, and he knew that he only charged monthly rent of \$1,150 for the Basement Unit of 6318 N Francisco during the period of June 2020 through May 2021, and not the \$1,150 he claimed to have charged in the application. Respondent further knew the statements were false because he knew that Tenant J did not reside in the Basement Unit of 6318 N Francisco. Respondent also knew the statements

Francisco only had one unit on the first floor and that Tenant K did not reside in Unit 1 or any other unit at 6318 N Francisco. Respondent further knew the statements were false because he knew that he only charged monthly rent of \$1,350 for Unit 1 of 6318 N Francisco during the period of June 2020 through May 2021, and not the \$1,750 he claimed to have charged in the application. Respondent also knew the statements were false because he knew that he received monthly rent payments from the tenant residing in Unit 1 of 6318 N Francisco for at least June 2020 through October 2020.

L. *6155 N Springfield – Tenant L*

90. On or about May 30, 2021, Respondent, or someone at his direction, prepared and submitted an ILRPP application to IHDA on behalf of a tenant purportedly renting 6155 N Springfield (“Tenant L”). The application was assigned Application ID number 81294. In the application, Respondent, or someone at his direction, alleged that Tenant L owed Respondent \$27,000 in past-due rent from June 2020 through May 2021. In connection with Application 81294, Respondent, or someone at his direction, prepared and submitted to IHDA a rent ledger which alleged that Tenant L had not paid \$2,250 in monthly rent from June 2020 through May 2021.

91. Respondent’s statements in Application 81294 and the related rent ledger that Tenant L owed past-due rent of \$27,000 for the period of June 2020 through May 2021 were false. Respondent’s statements were false because Respondent only charged monthly rent of \$2,050 for 6155 N Springfield during that period, and not the \$2,250 he claimed to have charged in the application. Respondent’s statements were further false because Tenant L did not reside at 6155 N Springfield. Respondent’s statements were also false because Respondent received monthly rent

were false because he knew that he had received monthly rent payments from the tenant residing in the Basement Unit of 6318 N Francisco for at least June 2020 through October 2020.

K. *6318 N Francisco, Unit 1R – Tenant K*

87. On or about May 29, 2021, Respondent, or someone at his direction, prepared and submitted an ILRPP application to IHDA on behalf of a tenant purportedly renting Unit 1R of 6318 N Francisco (“Tenant K”). The application was assigned Application ID number 81288. In the application, Respondent, or someone at his direction, alleged that Tenant K owed Respondent \$21,000 in past-due rent from June 2020 through May 2021. In connection with Application 81288, Respondent, or someone at his direction, prepared and submitted to IHDA a rent ledger which alleged that Tenant K had not paid \$1,750 in monthly rent from June 2020 through May 2021.

88. Respondent’s statements in Application 81288 and the related rent ledger that Tenant K owed past-due rent of \$21,000 for the period of June 2020 through May 2021 were false. Respondent’s statements were false because 6318 N Francisco only had one unit on the first floor, and Tenant K did not reside in Unit 1 or any other unit at 6318 N Francisco. Respondent’s statements were further false because Respondent only charged monthly rent of \$1,350 for Unit 1 of 6318 N Francisco during that period, and not the \$1,750 he claimed to have charged in the application. Respondent’s statements were also false because Respondent received monthly rent payments from the tenant residing in Unit 1 of 6318 N Francisco for at least June 2020 through October 2020.

89. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documentation to IHDA for Tenant K that the statements were false because Respondent was the owner and landlord for 6318 N Francisco, and he knew that 6318 N

payments from the tenant residing at 6155 N Springfield for at least June 2020 through January 2021.

92. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documentation to IHDA for Tenant L that the statements were false because Respondent was the owner and landlord for 6155 N Springfield, and he knew that he only charged monthly rent of \$2,050 during the period of June 2020 through May 2021, and not the \$2,250 he claimed to have charged in the application. Respondent further knew the statements were false because he knew that Tenant L did not reside at 6155 N Springfield. Respondent also knew the statements were false because he knew that he received rent payments from the tenant residing at 6155 N Springfield for at least June 2020 through January 2021.

M. *6140 N Kimball – Tenant M*

93. On or about December 13, 2022, Respondent, or someone at his direction, prepared and submitted an ILRPP application to IHDA on behalf of a tenant purportedly renting 6140 N Kimball (“Tenant M”). The application was assigned Application ID number 914935. In the application, Respondent, or someone at his direction, alleged that Tenant M owed Respondent \$30,000 in past-due rent from October 2020 through December 2021. In connection with Application 914935, Respondent, or someone at his direction, prepared and submitted to IHDA a rent ledger which alleged that Tenant M had not paid \$2,000 in monthly rent from October 2020 through December 2021.

94. Respondent’s statements in Application 914935 and the related rent ledger that Tenant M owed past-due rent of \$30,000 for the period of October 2020 through December 2021 were false. Respondent’s statements were false because Respondent did not own 6140 N Kimball

until October 2021. Respondent's statements were further false because Tenant M never resided at 6140 N Kimball.

95. Respondent knew when he, or someone at his direction, submitted the ILRPP application to IHDA for Tenant M that the statements were false because Respondent knew that he did not own 6140 N Kimball until October 2021. Respondent further knew the statements were false because he knew that Tenant M never resided at 6140 N Kimball.

96. In December 2021, Respondent, or someone at his direction, prepared and submitted an ERAP application to CDOH on behalf of Tenant M purportedly renting 6140 N Kimball. The application was assigned Application ID number 947502. In the application, Respondent, or someone at his direction, alleged that Tenant M owed Respondent \$30,000 in past-due rent from October 2020 through December 2021. In connection with Application 947502, Respondent, or someone at his direction, prepared and submitted to CDOH a rent ledger which alleged that Tenant M had not paid \$2,000 in monthly rent from October 2020 through December 2021.

97. Respondent's statements in Application 947502 and the related rent ledger that Tenant M owed past-due rent of \$30,000 for the period of October 2020 through December 2021 were false. Respondent's statements were false because Respondent did not own 6140 N Kimball until October 2021. Respondent's statements were further false because Tenant M never resided at 6140 N Kimball.

98. Respondent knew when he, or someone at his direction, submitted the ERAP application and supporting documentation to CDOH for Tenant M that the statements were false because Respondent knew that he did not own 6140 N Kimball until October 2021. Respondent

further knew the statements were false because he knew that Tenant M never resided at 6140 N Kimball.

N. *6318 N Francisco, Unit 2 – Tenant N*

99. In December 2021, Respondent, or someone at his direction, prepared and submitted an ERAP application to CDOH on behalf of a tenant renting in Unit 2 of 6318 N Francisco (“Tenant N”). The application was assigned Application ID number 955605. In the application, Respondent, or someone at his direction, alleged that Tenant N owed Respondent \$40,000 in past-due rent from May 2020 through December 2021. In connection with Application 955605, Respondent, or someone at his direction, prepared and submitted to CDOH a rent ledger which alleged that Tenant N had not paid \$2,000 in monthly rent from October 2020 through December 2021.

100. Respondent’s statements in Application 955605 and the related rent ledger that Tenant N owed past-due rent of \$40,000 for the period of May 2020 through December 2021 were false. Respondent’s statements were false because Respondent only charged monthly rent of \$1,850, then \$1,300, and later \$1,500 for Unit 2 of 6318 N Francisco during that period, and not the \$2,000 he claimed to have charged in the application. Respondent’s statements were further false because Respondent received monthly rent payments from Tenant N for at least October 2021 through December 2021.

101. Respondent knew when he, or someone at his direction, submitted the ERAP application and supporting documentation to CDOH for Tenant N that the statements were false because Respondent was the owner and landlord for Unit 2 of 6318 N Francisco, and he knew that he only charged monthly rent of \$1,850, then \$1,300, and later \$1,500 for Unit 2 of 6318 N Francisco during the period of May 2020 through December 2021, and not the \$2,000 he claimed

to have charged in the application. Respondent further knew the statements were false because he knew that he received rent payments from Tenant N for at least October 2021 through December 2021.

102. On or about January 9, 2022, Respondent, or someone at his direction, prepared and submitted an ILRPP application to IHDA on behalf of Tenant N renting Unit 2 of 6318 N Francisco. The application was assigned Application ID number 982577. In the application, Respondent, or someone at his direction, alleged that Tenant N owed Respondent \$40,000 in past-due rent from June 2020 through January 2022. In connection with Application 982577, Respondent, or someone at his direction, prepared and submitted to IHDA a rent ledger which alleged that Tenant N had not paid \$2,000 in monthly rent from June 2020 through January 2022.

103. Respondent's statements in Application 982577 and the related rent ledger that Tenant N owed past-due rent of \$40,000 for the period of June 2020 through January 2022 were false because Respondent only charged monthly rent of \$1,850, \$1,300, and later \$1,500 for Unit 2 of 6318 N Francisco during that period, and Respondent received monthly rent payments from Tenant N for at least October 2021 through January 2022.

104. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documentation to IHDA for Tenant N that the statements were false because Respondent was the owner and landlord for Unit 2 of 6318 N Francisco, and he knew that he only charged monthly rent of \$1,850, then \$1,300, and later \$1,500 for Unit 2 of 6318 N Francisco during the period of June 2020 through January 2022, and not the \$2,000 he claimed to have charged in the application. Respondent further knew the statements were false because he knew that he received rent payments from Tenant N for at least October 2021 through January 2022.

O. *6034 N Fairfield, Unit 2F – Tenant O*

105. In December 2021, Respondent, or someone at his direction, prepared and submitted an ERAP application to CDOH on behalf of a tenant renting Unit 2F of 6034 N Fairfield (“Tenant O”). The application was assigned Application ID number 958449. In the application, Respondent, or someone at his direction, alleged that Tenant O owed Respondent \$30,000 in past-due rent from October 2020 through December 2021. In connection with Application 958449, Respondent, or someone at his direction, prepared and submitted to CDOH a rent ledger which alleged that Tenant O had not paid \$2,000 in monthly rent from October 2020 through December 2021.

106. Respondent’s statements in Application 958449 and the related rent ledger that Tenant O owed past-due rent of \$30,000 for the period of October 2020 through December 2021 were false. Respondent’s statements were false because Respondent only charged monthly rent of \$1,250 and later \$1,100 for Unit 2F of 6034 N Fairfield Ave during that period, and not the \$2,000 he claimed to have charged in the application. Respondent’s statements were further false because Respondent received monthly rent payments from the tenant residing in Unit 2F of 6034 N Fairfield for at least March 2021 through December 2021.

107. Respondent knew when he, or someone at his direction, submitted the ERAP application and supporting documentation to CDOH for Tenant O that the statements were false because Respondent was the owner and landlord for Unit 2F of 6034 N Fairfield, and he knew that he only charged monthly rent of \$1,250 and later \$1,100 for Unit 2F of 6034 N Fairfield during the period of October 2020 through December 2021, and not the \$2,000 he claimed to have charged in the application. Respondent further knew that the statements were false because he knew that

he received rent payments from the tenant residing in Unit 2F of 6034 N Fairfield for at least March 2021 through December 2021.

108. On or about January 5, 2022, Respondent, or someone at his direction, prepared and submitted an ILRPP application to IHDA on behalf of Tenant O renting Unit 2F of 6034 N Fairfield. The application was assigned Application ID number 963991. In the application, Respondent, or someone at his direction, alleged that Tenant O owed Respondent \$40,000 in past-due rent from June 2020 through January 2022. In connection with Application 963991, Respondent, or someone at his direction, prepared and submitted to IHDA a rent ledger which alleged that Tenant O had not paid \$2,000 in monthly rent from June 2020 through January 2022.

109. Respondent's statements in Application 963991 and the related rent ledger that Tenant O owed past-due rent of \$40,000 for the period of June 2020 through January 2022 were false. Respondent's statements were false because Respondent only charged monthly rent of \$1,250 and later \$1,100 for Unit 2F of 6034 N Fairfield during that period, and not the \$2,000 he claimed to have charged in the application. Respondent's statements were further false because Respondent received monthly rent payments from the tenant residing in Unit 2F of 6034 N Fairfield for at least June 2020 through September 2020 and March 2021 through January 2022.

110. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documentation to IHDA for Tenant O that the statements were false because Respondent was the owner and landlord for Unit 2F of 6034 N Fairfield, and he knew that he only charged monthly rent of \$1,250 and later \$1,100 for Unit 2F of 6034 N Fairfield during the period of June 2020 through January 2022, and not the \$2,000 he claimed to have charged in the application. Respondent further knew that the statements were false because he knew that he

received rent payments from the tenant residing in Unit 2F of 6034 N Fairfield for at least June 2020 through September 2020 and March 2021 through January 2022.

P. *6155 N Springfield – Tenant P*

111. In December 2021, Respondent, or someone at his direction, prepared and submitted an ERAP application to CDOH on behalf of a tenant purportedly renting 6155 N Springfield (“Tenant P”). The application was assigned Application ID number 958584. The Application alleged that Tenant P owed Respondent \$50,000 in past-due rent from May 2020 through December 2021. In connection with Application 958584, Respondent, or someone at his direction, prepared and submitted to CDOH a rent ledger which alleged that Tenant P had not paid \$2,500 in monthly rent from May 2020 through December 2021.

112. Respondent’s statements in Application 958584 and the related rent ledger that Tenant P owed past-due rent of \$50,000 for the period of May 2020 through December 2021 were false. Respondent’s statements were false because Respondent only charged monthly rent of \$2,050 for 6155 N Springfield during that period, and not the \$2,500 he claimed to have charged in the application. Respondent’s statements were further false because Tenant P did not reside at 6155 N Springfield. Respondent’s statements were also false because Respondent received monthly rent payments from the tenant residing at 6155 N Springfield for at least June 2020 through January 2021 and May 2021 through June 2021.

113. Respondent knew when he, or someone at his direction, submitted the ERAP application and supporting documentation to CDOH for Tenant P that the statements were false because Respondent was the owner and landlord of 6155 N Springfield, and he knew that he only charged monthly rent of \$2,050 for 6155 N Springfield during the period of May 2020 through December 2021, and not the \$2,500 he claimed to have charged in the application. Respondent

further knew the statements were false because he knew that Tenant P did not reside at 6155 N Springfield. Respondent also knew the statements were false because Respondent received monthly rent payments from the tenant residing at 6155 N Springfield for at least June 2020 through January 2021 and May 2021 through June 2021.

Q. 6318 N Francisco, Garden Unit – Tenant Q

114. In December 2021, Respondent, or someone at his direction, prepared and submitted an ERAP application to CDOH on behalf of a tenant renting the Garden Unit of 6318 N Francisco (“Tenant Q”). The application was assigned Application ID number 960081. In the application, Respondent, or someone at his direction, alleged that Tenant Q owed Respondent \$29,250 in past-due rent from October 2020 through December 2021. In connection with Application 960081, Respondent, or someone at his direction, prepared and submitted to CDOH a rent ledger which alleged that Tenant Q had not paid \$1,950 in monthly rent from October 2020 through December 2021.

115. Respondent’s statements in ERAP application 960081 and the related rent ledger that Tenant Q owed past-due rent of \$29,250 for the period of October 2020 through December 2021 were false. Respondent’s statements were false because Respondent only charged a monthly rent of \$1,400 for the Garden Unit of 6318 N Francisco during that period, and not the \$1,950 he claimed to have charged in the application. Respondent’s statement were also false because Respondent received monthly rent payments from the tenant residing in the Garden Unit of 6318 N Francisco for at least October 2020, May 2021, July 2021, and October 2021.

116. Respondent knew when he, or someone at his direction, submitted the ERAP application and supporting documentation to CDOH for Tenant Q that the statements were false because Respondent was the owner and landlord for the Garden Unit of 6318 N Francisco, and he

knew that he only charged monthly rent of \$1,400 for the Garden Unit of 6318 N Francisco during the period of October 2020 through December 2021, and not the \$1,950 he claimed to have charged in the application. Respondent further knew the statements were false because he knew that he received monthly rent payments from the tenants in the Garden Unit of 6318 N Francisco for at least October 2020, May 2021, July 2021, and October 2021.

117. On or about January 9, 2022, Respondent, or someone at his direction, prepared and submitted an ILRPP application to IHDA on behalf of Tenant Q renting the Garden Unit of 6318 N Francisco. The application was assigned Application ID number 979621. In the application, Respondent, or someone at his direction, alleged that Tenant Q owed Respondent \$21,450 in past-due rent from July 2020 through January 2022. In connection with Application 979621, Respondent, or someone at his direction, prepared and submitted to IHDA a rent ledger which alleged that Tenant Q had not paid \$750 in rent due for July 2020 and \$1,150 in monthly rent from August 2020 through January 2022.

118. Respondent's statements in Application 979621 and the related rent ledger that Tenant Q owed past-due rent of \$21,450 for the period of July 2020 through January 2022 were false. Respondent's statements were false because Respondent received monthly rent payments from the tenant residing in the Garden Unit of 6318 N Francisco for at least July 2020 through October 2020, May 2021, July 2021, and October 2021.

119. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documentation to IHDA for Tenant Q that the statements were false because Respondent was the owner and landlord for the Garden Unit of 6318 N Francisco, and he knew that he only charged monthly rent of \$1,400 for the Garden Unit of 6318 N Francisco during the period of July 2020 through January 2022, and not the \$1,950 he claimed to have charged in

the application. Respondent further knew the statements were false because he knew that he received monthly rent payments from the tenants in the Garden Unit of 6318 N Francisco for at July 2020 through October 2020, May 2021, July 2021, and October 2021.

R. *6318 N Francisco, Unit 3 – Tenant R*

120. In December 2021, Respondent, or someone at his direction, prepared and submitted an ERAP application to CDOH on behalf of a tenant purportedly renting Unit 3 of 6318 N Francisco (“Tenant R”). The application was assigned Application ID number 958572. In the application, Respondent, or someone at his direction, alleged that Tenant R owed Respondent \$43,000 in past-due rent from May 2020 through December 2021. In connection with Application 958572, Respondent, or someone at his direction, prepared and submitted to CDOH a rent ledger which alleged that Tenant R had not paid \$2,150 in monthly rent from May 2020 through December 2021.

121. Respondent’s statements in ERAP application 958572 and the related rent ledger that Tenant R owed past-due rent of \$43,000 for the period of May 2020 through December 2021 were false. Respondent’s statements were false because Tenant R did not reside in Unit 3 or any other unit at 6318 N Francisco.

122. Respondent knew when he, or someone at his direction, submitted the ERAP application and supporting documentation to CDOH for Tenant R that the statements were false because Respondent was the owner and landlord for Unit 3 of 6318 N Francisco, and he knew that Tenant R was not the tenant that rented Unit 3 of 6318 N Francisco or any other unit managed by Respondent.

123. On or about January 9, 2022, Respondent, or someone at his direction, prepared and submitted an IRLPP application to IHDA on behalf of Tenant R purportedly renting Unit 3 of

6318 N Francisco. The application was assigned Application ID number 983038. In the application, Respondent, or someone at his direction, alleged that Tenant R owed Respondent \$43,000 in past-due rent from May 2020 through December 2021. In connection with Application 983038, Respondent, or someone at his direction, prepared and submitted to IHDA a rent ledger which alleged that Tenant R had not paid \$2,150 in monthly rent from May 2020 through December 2021.

124. Respondent’s statements in IRLPP application 958572 and the related rent ledger that Tenant R owed past-due rent of \$43,000 for the period of May 2020 through December 2021 were false. Respondent’s statements were false because Tenant R did not reside in Unit 3 or any other unit at 6318 N Francisco.

125. Respondent knew when he, or someone at his direction, submitted the ILRPP application and supporting documentation to IHDA for Tenant R that the statements were false because Respondent was the owner and landlord for Unit 3 of 6318 N Francisco, and he knew that Tenant R was not the tenant that rented Unit 3 of 6318 N Francisco or any other unit managed by Respondent.

S. *Falsified Driver’s Licenses and Utility Bills*

126. Additionally, in May 2021, Respondent, or someone at his direction, created and submitted fake Illinois driver’s licenses to IDHA in connection with the ILRPP applications identified in the table, below:

Tenant	Application ID	Property
Tenant S	80097	6318 N Francisco, Studio
Tenant K	81288	6318 N Francisco, Unit 1R
Tenant L	81294	6155 N Springfield

127. The Illinois driver’s licenses submitted to IHDA in connection with the ILRPP applications set forth in paragraph 137, above, were fake because the Illinois Secretary of State

never issued driver’s licenses to the purported tenant using the license numbers and other information listed on each of the fake driver’s licenses.

128. Respondent knew when he, or someone at his direction, submitted the fake Illinois driver’s licenses in connection with the ILRPP applications set forth in paragraph 137, above, to IHDA that those Illinois driver’s licenses were fake. Respondent knew the Illinois driver’s licenses submitted to IHDA were fake because he created, or directed someone to create, the fake driver’s licenses in an attempt to prove that the purported tenants lived in the rental units of their respective ILRPP applications.

129. Additionally, between May 2021 and January 2022, Respondent, or someone at his direction, created and submitted fake utility bills to IDHA and CDOH in connection with multiple ILRPP and ERAP applications. The fake utility bills were submitted with the applications identified in the table, below:

Tenant	Application ID	Property	Utility Bills
Tenant X	46076	6034 N Fairfield Ave, FL 1	ComEd
Tenant T	47359	6034 N Fairfield Ave, Apt 1R	People’s Gas
Tenant Z	57741	6318 N Francisco, Apt 3	ComEd
Tenant I	58011	6155 N Springfield Ave	ComEd
Tenant Y	58267	6318 N Francisco, Apt 3R	ComEd
Tenant AA	58310	6318 N Francisco, Apt 2R	ComEd
Tenant J	80047	6318 N Francisco Ave, Unit Bsmt	ComEd
Tenant BB	80065	6318 N Francisco, Apt 2	People’s Gas
Tenant Y	80086	6318 N Francisco, Apt 3R	ComEd
Tenant Z	81193	6318 N Francisco, Apt 3	ComEd
Tenant J	81229	6318 N Francisco Ave, Unit Bsmt	ComEd
Tenant W	81357	6220 N Springfield Ave	ComEd
Tenant V	81358	6034 N Fairfield	ComEd
Tenant X	81360	6034 N Fairfield, 1F	ComEd
Tenant T	81365	6034 N Fairfield, 1R	ComEd
Tenant M	914935	6140 N Kimball	ComEd
Tenant V	923696	6034 N Fairfield Ave, Apt BSMT	ComEd

Tenant V	947486	6034 N Fairfield Ave, Apt BSMT	ComEd
Tenant Y	958572	6318 N Francisco, Apt 3	ComEd
Tenant T	963399	6220 N Springfield Ave	ComEd
Tenant P	963633	6155 N Springfield Ave	People's Gas
Tenant O	963991	6034 N Fairfield Ave, Apt 2F	ComEd
Tenant G	975829	6034 N Fairfield Ave, Garden Unit	ComEd
Tenant X	976370	6034 N Fairfield Ave, Apt 1F	People's Gas
Tenant T	977217	6034 N. Fairfield Ave, Apt 1R	ComEd
Tenant E	979072	6034 N. Fairfield Ave, Apt 2R	ComEd
Tenant Q	979621	6318 N Francisco, Unit GDN	People's Gas
Tenant N	982577	6318 N Francisco, Apt 2	People's Gas
Tenant Y	983038	6318 N Francisco, Apt 3	ComEd

130. The utility bills submitted to IHDA in connection with the ILRPP applications set forth in paragraph 140, above, were fake because ComEd and People's Gas did not have utility accounts for those purported tenants using the account numbers and service addresses listed on each of the utility bills.

131. Respondent knew when he, or someone at his direction, submitted the utility bills with the ILRPP and ERAP applications set forth in paragraph 140, above, to IHDA and CDOH that those utility bills were fake. Respondent knew the utility bills submitted to IHDA and CDOH were fake because he created, or directed someone to create, the fake utility bills in an attempt to prove that the purported tenants lived in the rental units of their respective ILRPP applications.

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

- a. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation by conduct including preparing and submitting at least 57 false applications for rental assistance to IHDA and CDOH, submitting three fake driver's licenses

in connection with three applications for rental assistance to IHDA, and submitting 32 fake utility bills in connection with applications for rental assistance to IHDA and CDOH, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

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

Respectfully submitted,

Lea S. Gutierrez, Administrator
Attorney Registration and
Disciplinary Commission

By: /s/ Richard Gleason
Richard Gleason

Richard Gleason
Matthew Lango
Counsel for Administrator
One Prudential Plaza
130 East Randolph Drive, Suite 1500
Chicago, Illinois 60601-6219
Telephone: (312) 565-2600
E-mail: ARDCeService@iadc.org
E-mail: rgleason@iadc.org
E-mail: mlango@iadc.org
4897-1312-9643, v. 1