

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

In the Matter of:)	
)	
MAHDIS AZIMI,)	Commission No. 2021PR00017
)	
Attorney-Respondent,)	
)	
No. 6320242.)	

AMENDED ANSWER TO COMPLAINT

Now Comes Respondent, Mahdis Azimi, by and through her attorney, Allison L. Wood, and responds to the Complaint as follows:

COMMISSION RULE 231 STATEMENT

Respondent was licensed to practice law in the State of Illinois on November 5, 2015. Respondent is not admitted to practice law in any other state. Respondent holds no other professional licenses or certifications.

COUNT I

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

1. Between August 2016 and March 18, 2018, Anish Parikh (“Parikh”), owner of Parikh Law Group, employed Respondent as an associate attorney. Respondent’s practice consisted primarily of immigration matters.

Answer: Respondent states that she was an associate at the Parikh Law Group as an associate attorney from August 2016 through April 13, 2018. Respondent further states that immigration was one of five practice areas engaged in by the Parikh Law Group. All remaining allegations are denied.

2. Prior to May 12, 2017, Gaby Abboud (“Abboud”), a Chicago-based photographer, took photographs of attorneys in the Parikh Law Group for the firm’s website. Shortly after taking the photographs, Parikh directed Respondent to contact Abboud to discuss an immigration matter.

Answer: Respondent admits the allegations in paragraph 2.

3. On May 12, 2017, Respondent and Abboud discussed a lawful permanent resident (“green card”) application for Abboud’s fiancée, Michelle Obeid (“Obeid”), including Obeid entering the United States on a non-immigrant visitor visa (“visitor visa”) and then filing for an adjustment of status from visitor visa to a green card. Respondent advised that the adjustment of status process allowed for an application to be submitted and processed without the applicant returning to her home country to await visa processing.

Answer: Respondent admits that on May 12, 2017, she discussed several options for obtaining status as either a fiancée or spouse of a United States Citizen. Obeid ultimately decided to travel on a non-immigrant visitor visa. Respondent further admits that she advised that the adjustment of status process allowed for an application to be submitted and processed without the applicant returning to her home country to await visa processing. All remaining allegations are denied.

4. In July 2017, Obeid entered the United States on a visitor visa. Subsequently, Respondent met with Obeid to discuss submitting a one-step adjustment of status application to amend her visitor visa to a green card after Obeid and Abboud married.

Answer: Respondent admits that she became aware that Obeid entered the United States on a visitor visa in July 2017. Respondent admits that she met with Obeid to discuss submitting a one-step adjustment of status application to adjust her visitor visa holder status to a green card after Obeid and Abboud married. All remaining allegations are denied.

5. On October 14, 2017, Abboud and Obeid married.

Answer: Respondent admits that she became aware that Abboud and Obeid married on October 14, 2017.

6. On November 2, 2017, Abboud hired the Parikh Law Firm to represent Obeid in submitting the one-step adjustment of status application for a green card. Parikh Law Firm and Abboud did not have a written retainer agreement. However, Abboud paid Parikh Law firm the agreed upon fee of \$1,760 and Parikh assigned Respondent to the matter.

Answer: Respondent admits that Abboud hired the Parikh Law firm to represent Obeid in submitting the one-step adjustment status application for a green card and that Parikh assigned the matter to Respondent. Upon information and belief, Abboud did not pay for legal services rendered. Respondent has insufficient information in relation to the remaining allegations and therefore denies them.

7. On November 8, 2017, Obeid emailed Respondent to check on the status of the application and ask a question about obtaining state identification.

Answer: Respondent admits the allegations in paragraph 7.

8. On November 9, 2017, Respondent emailed Obeid and stated, “I did file the papers and haven’t received a receipt yet but will let you know once I do.”

Answer: Respondent admits the allegations in paragraph 8.

9. Respondent’s representation in paragraph eight was false, because she had not filed the application.

Answer: Respondent denies the allegations in paragraph 9.

10. Respondent knew at the time she made the representation in paragraph eight that it was false.

Answer: Respondent denies the allegations in paragraph 10.

11. On February 28, 2018, Obeid received a notice from the United States Department of Homeland Security stating that she was required to appear for a meeting on March 13, 2018 regarding an I-94 update inquiry, which indicated an overstay on a visitor visa.

Answer: The allegations in paragraph 11 do not speak to Respondent's conduct or knowledge and therefore Respondent denies them.

12. After receiving the notice, Abboud and Obeid contacted Respondent. Respondent stated that she had filed the one-step adjustment of status application for a green card.

Answer: Respondent admits only that she was contacted by Abboud and Obeid and that in response to their inquiry, she advised them that she had filed the one-step adjustment of status application for a green card. Respondent has insufficient knowledge as to the remaining allegations and therefore denies them.

13. Respondent's representation in paragraph 12 was false, because she had not filed the one-step adjustment of status application for a green card.

Answer: Respondent denies the allegations in paragraph 13.

14. Respondent knew at the time she made the representations in paragraph 13 that it was false.

Answer: Respondent denies the allegations in paragraph 14.

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

- a. Failing to act with reasonable diligence and promptness in representing a client, by conduct including Respondent's failure to file a one-step adjustment of status for a green card in a timely manner, in violation of Rule 1.3 of the Illinois Rules of Professional Conduct (2010); and
- b. Engaging in conduct involving dishonesty, fraud, deceit or misrepresentation, by conduct including knowingly making false statements described in paragraphs 8 and 12, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

Answer: Respondent neither admits nor denies the allegations in paragraph 15 as said allegations are not factual, but state conclusions of law. To the extent an answer is deemed required, the allegations are denied.

COUNT II

(Fabricating false documents and providing them to a client)

16. The Administrator realleges the allegations contained in paragraphs one through 14 above.

Answer: Respondent realleges the responses to allegations contained in paragraphs one through 14 above.

17. Between November 8, 2017 and February 28, 2018, Abboud and Obeid contacted Respondent by telephone and email to inquire about the status of the application.

Answer: Respondent admits the allegations in paragraph 17.

18. On February 28, 2018, after receiving the notice from the United States Department of Homeland Security stating that Obeid was required to appear for a meeting on March 13, 2018 regarding an I-94 update inquiry, Obeid and Abboud contacted Respondent. Obeid and Abboud told Respondent that they wanted her to attend the meeting on their behalf.

Answer: Respondent admits that Obeid and Abboud advised her that they had received a notice from the United States Department of Homeland Security that required them to

appear for a meeting on March 13, 2018 regarding an I-94 update inquiry. Respondent also admits that they asked her to attend that meeting on their behalf. Respondent has insufficient knowledge as to the remaining allegations and therefore denies them.

19. On March 14, Respondent called Abboud and Obeid and stated that she appeared for the meeting with the United States Department of Homeland Security on Obeid's behalf and the meeting had been re-set to March 16, 2018 in order for Obeid to appear.

***Answer:* Respondent admits the allegations in paragraph 19.**

20. On or before March 14, 2018, Respondent fabricated an email purportedly sent to Respondent on February 20, 2018 at 2:54 p.m. from Pauline Woodson ("Woodson"), Adjudications Branch Chief of United States Citizenship and Immigration Services (USCIS). Woodson's purported email to Respondent stated:

"Good Afternoon,

Thank you for your inquiry. We have reviewed the case file and, based on this, have requested that a new receipt be sent to Applicant and Attorney of Record.

Thank you,
Pauline Woodson"

***Answer:* Respondent admits the allegations in paragraph 20, but states that she did not represent herself to be Pauline Woodson. Respondent further states that she represented that the above email was received by her from Pauline Woodson.**

21. On March 14, 2018, Respondent sent the fabricated email described in paragraph 20 to Abboud and Obeid.

***Answer:* Respondent admits the allegations in paragraph 21, but states that she represented to Abboud and Obeid that she had received this email from Pauline Woodson.**

22. Respondent's representation to Abboud and Obeid that she received the email described in paragraph 20 was false, because she fabricated it specifically to send to Obeid and Abboud.

***Answer:* Respondent admits the allegations in paragraph 22.**

23. At the time Respondent sent the email described in paragraph 20 to Aboud and Obeid, Respondent knew that the email was false.

Answer: Respondent admits the allegations in paragraph 23. Respondent further states that she deeply regrets her conduct as she had only been licensed for 2 years when this incident occurred. She did not receive any supervision, training, or guidance of any kind from her employer, Anish Parikh. Despite her numerous requests for assistance, he refused to assist her with this case. As a result of her depression and anxiety, she panicked and sent the email hoping to appease the client until she could find out the status of the application. Notably, Mr. Parikh was suspended on February 11, 2021, for one year with the suspension stayed after five months in favor of a two-year period of probation, subject to conditions. He mishandled over \$70,000 in real estate escrow and earnest money funds by intentionally withdrawing funds from his firm's client trust account, drawing the balance in that account below the amounts that should have been held. By order dated April 27, 2021, Mr. Parikh was suspended from practice before the Department of Homeland Security, Board of Immigration Appeals, and the Immigration Court.

24. On or before March 15, 2018, Respondent fabricated an email purportedly sent to Respondent on December 19, 2017 at 2:54 p.m. from an individual identified as Melissa of the Lockbox Support Team of USCIS. Melissa's purported email to Respondent stated:

“Good Afternoon,
Thank you for your inquiry. We have reviewed the case file
And can tell you that the case has been “fee’d” in.

Thank you,

Melissa
The Lockbox Support Team
U.S. Citizenship and Immigration Services”

Answer: Respondent admits the allegations in paragraph 24, but states that she did not represent herself to be Melissa. Respondent further states that she represented that the above email was received by her from Melissa.

25. On March 15, 2018, Respondent sent the email described in paragraph 24 to Parikh, Obeid and Abboud.

Answer: Respondent admits the allegations in paragraph 25.

26. Respondent's representation to Abboud and Obeid that she received the email described in a paragraph 24 was false, because she did not receive the email from Melissa and fabricated it specifically to send to Obeid and Abboud.

Answer: Respondent admits the allegations in paragraph 26.

27. At the time Respondent sent the email described in paragraph 24 to Abboud and Obeid, Respondent knew that the email was false.

Answer: Respondent admits the allegations in paragraph 27. Respondent further states that she deeply regrets her conduct as she had only been licensed for 2 years when this incident occurred. She did not receive any supervision, training, or guidance of any kind from her employer, Anish Parikh. Despite her numerous requests for assistance, he refused to assist her with this case. As a result of her depression and anxiety, she panicked and sent the email hoping to appease the client until she could find out the status of the application. Notably, Mr. Parikh was suspended on February 11, 2021, for one year with the suspension stayed after five months in favor of a two-year period of probation, subject to conditions. He mishandled over \$70,000 in real estate escrow and earnest money funds by intentionally withdrawing funds from his firm's client trust account, drawing the balance in that account below the amounts that should have been held. By order dated April 27, 2021, Mr. Parikh was suspended from practice before the Department of Homeland Security, Board of Immigration Appeals, and the Immigration Court.

28. 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 knowingly fabricating and sending the false email described in paragraph 20 to Abboud and Obeid and knowingly fabricating and sending the false email described in paragraph 24 to Parikh, Abboud, and Obeid, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

Answer: Respondent neither admits nor denies the allegations in paragraph 28 as said allegations are not factual, but state conclusions of law. To the extent an answer is deemed required, the allegations are denied.

AFFIRMATIVE DEFENSES TO THE COMPLAINT

Respondent states that when she was assigned the immigration matter that is the subject of this complaint, she had been licensed for 2 years and she had little experience handling such matters or managing client relationships. She repeatedly asked Mr. Parikh for training, assistance and guidance and he refused to do so. Mr. Parikh effectively violated his duties to her pursuant to Illinois Rules of Professional Conduct Rule 5.1 (Responsibilities of Partners, Managers, and Supervisory Lawyers). His ability to properly supervise Respondent is questionable given the fact that he was suspended from the practice of law on February 11, 2021, for one year with the suspension stayed after five months in favor of a two-year period of probation, subject to conditions. He mishandled over \$70,000 in real estate escrow and earnest money funds by intentionally withdrawing funds from his firm's client trust account, drawing the balance in that account below the amounts that should have been held. By order dated April 27, 2021, Mr. Parikh was suspended from practice before the Department of Homeland Security, Board of Immigration Appeals, and the Immigration Court.

Respondent states that she filed the one-step adjustment of status application for Obeid to obtain a green card. Naively, she did not send it by certified mail or by any other method that would have garnered a receipt or a way to track the application. When she realized that the application has not been received by Immigration Services, she met with Abboud and Obeid to complete a second application. She repeatedly asked Mr. Parikh to provide guidance and to meet with her when she met with Abboud and Obeid. He refused to attend the meeting or to provide any assistance.

Respondent has been dealing with depression and anxiety. She did not have the skills required to manage the client relationship without assistance. When the clients rightfully demanded to know the status of the application, Respondent panicked and sent the false emails to the clients because she thought it would appease them until she could learn the actual status of the application. Respondent fully understands that her actions were wrong, but it was not her intention to cause any harm to the clients. She felt like she was in a desperate situation and she made a desperately poor decision.

Respondent resigned from the Parikh firm shortly after the incident and worked for a small immigration firm where she received mentoring and support. A year later in May 2019, Respondent was accepted into the Chicago Bar Foundation's Justice Entrepreneurs Project, an incubator for small law firms and solo law practices. She completed the program in November 2020 and has been successfully operating a solo immigration practice. She understands the importance of keeping track of filed applications; and she knows how to manage her client relationships. She has systems in place to provide a high quality of service to her clients. Along the way, she has volunteered with the American Immigration Lawyers Association, served on the board of the Northern Illinois Justice for our Neighbors Board, and she currently serves on the

Board of the National Lawyers Guild. For the past 5 years, Respondent has provided hundreds of hours of *pro bono* services. She has several attorneys who have mentored her along the way and supported her as she transitioned from a naïve inexperienced attorney to a seasoned immigration attorney who operates her own practice and who enjoys a solid reputation in the legal community.

WHEREFORE, Respondent respectfully requests that this cause be considered and that the Hearing Board make a just recommendation as is warranted by the facts.

Respectfully Submitted,



Counsel for Respondent

Allison L. Wood
Legal Ethics Consulting, P.C.
205 North Michigan Avenue
Suite 810
Chicago, Illinois 60611
(773) 595-5623

Dated: May 5, 2021

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

In the Matter of:)
MAHDIS AZIMI,) Commission No. 2021PR00017
Attorney-Respondent,)
No. 6320242.)

NOTICE OF FILING

TO: Rachel C. Miller
 Counsel for the Administrator
 Illinois Attorney Registration and Disciplinary Commission
 3161 West White Oaks Drive, Suite 301
 Springfield, Illinois 62704
rmiller@iardc.org

Please take notice that on May 5, 2021, an electronic copy of **RESPONDENT'S AMENDED ANSWER**, submitted to the clerk of the Attorney Registration and Disciplinary Commission; and on that same date, a copy was served via email on Counsel for the Administrator at rmiller@iardc.org.

Respectfully Submitted,

Counsel for Respondent

Allison L. Wood
 Legal Ethics Consulting, P.C.
 205 North Michigan Avenue
 Suite 810
 Chicago, Illinois 60601
 (773) 595-5623
aw@legalethicsconsulting.com

Dated: May 5, 2021

FILED
 5/5/2021 1:33 PM
 ARDC Clerk

PROOF OF SERVICE

The undersigned, being first duly sworn on oath deposes and states that she served a copy of this **Notice of Filing and RESPONDENT'S ANSWER**, on the individual at the address listed on the foregoing Notice of Filing, by sending a copy via email on May 5, 2021.



Counsel for Respondent

Allison L. Wood
Legal Ethics Consulting, P.C.
205 North Michigan Avenue
Suite 810
Chicago, Illinois 60601
(773) 595-5623
aw@legalethicsconsulting.com

Dated: May 5, 2021