

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

FILED
2/4/2022 10:55 AM
ARDC Clerk

IN THE MATTER OF,)
)
 DANIEL GORDON PARSONS) Commission No. 2021PR00103
)
 Attorney-Respondent)
)
 No. 6208665)

RESPONDENT’S RESPONSE TO COMPLAINT

NOW COMES DANIEL GORDON PARSONS, Pro Se Respondent, and respectfully presents this Response to the Complaint of the Illinois Attorney Registration and Discipline Commission, and in support thereof states as follows:

COUNT 1

1. Respondent admits the allegations of paragraph 1, with the exception that Respondent’s practice primarily included Probate, Guardianship and Government Benefit matters.
2. Respondent admits the allegations of paragraph 2.
3. Respondent admits the allegations of paragraph 3.
4. Respondent admits the allegations of paragraph 4.
5. Respondent admits the allegations of paragraph 5.
6. Respondent admits the allegations of paragraph 6.
7. Respondent admits in part and denies in part the allegations of paragraph 7. **Respondent affirmatively states further that Respondent withdrew \$45,600.00 in error, mistakenly believing that Respondent’s share was 20% and, upon realizing Respondent’s mistake, Respondent, on May 3, 2019, electronically transferred from Respondent’s business account to Respondent’s trust account an amount of \$11,400.00 to correct Respondent’s**


error.

8. Respondent admits in part and denies in part the allegations of paragraph 8. **Respondent affirmatively states that only business expenses were paid from the business account.**
9. Respondent admits in part and denies in part the allegations of paragraph 9. **Respondent affirmatively states that a total of \$96,800.00 was paid to the Ohakas heirs and their representative, Fred Puss, who was reimbursed \$5,000.00 for the original retainer paid to Respondent, leaving \$64,950.00 remaining due to the Ohakas heirs. The reason for the delay in beginning distributions to the heirs was because of the requirement of obtaining tax information on behalf of the Executor, working through an intermediary, Mr. Fred Puss, of Estonia, who worked on behalf of the heirs, since the heirs were in Estonia and Ukraine and did not speak English. The heir from Ukraine was reluctant to provide tax information due to corruption in her country, which in turn caused me to be extra cautious when, ultimately, making distributions and requiring confirmation from the heirs that the funds had been delivered. The matter was further completed by the fact that Fifth Third Bank would only allow \$20,000.00 in transfers per day.**
10. Respondent admits the allegations of paragraph 10.
11. Respondent admits the allegations of paragraph 11.
12. Respondent denies the allegations of paragraph 12. **Respondent affirmatively states that the amount remaining due to the Ohakas heirs is \$64,950.00, which is the amount that was diverted to the business account and the overpayment of fees was returned to the Trust account as described above in paragraph 7.**
13. Respondent admits the allegations of paragraph 13.
14. Respondent admits the allegations of paragraph 14.
15. Respondent admits in part and denies in part the allegations of paragraph 12. **Respondent affirmatively states that Respondent made a horrible mistake in transferring the funds of the Ohakas heirs to Respondent's business account. There was never an intent to permanently deprive the Ohakas heirs of the remaining funds. Unfortunately, Respondent did not frequently need to use Respondent's Trust account did not keep good records of transfers in and out of Respondent's Trust account and was shocked, dismayed and ashamed to learn of the extent of the misdirected funds. The Respondent always understood and intended to complete the distribution of funds to the Ohakas heirs, knowing that the estate could not be closed until such distributions were confirmed with the Court. Respondent has made arrangements to**

obtain a loan in order to complete the distributions. The only reason that this was not done sooner was because Respondent wouldn't qualify or be able to make payments on a commercial loan. Respondent has arranged to borrow the funds to complete the distributions from a family member so flexible payment arrangements can be made.

WHEREFORE, it is with deepest regrets and remorse that DANIEL GORDON PARSONS, Pro Se Respondent, has put his firm and his clients in this shameful position and prays for leniency in the judgment of this honorable tribunal.

Respectfully Submitted:

BY: 
Daniel Parsons, Pro Se
Respondent

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