

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

In the Matter of: )  
)  
EDDY COPOT )  
) CASE NO: 2022PR00036  
Attorney-Respondent )  
)

**NOTICE OF FILING**

To: Jonathan M. Wier; Scott Renfroe  
Counsels for the Administrator  
Illinois Attorney Registration and Disciplinary Commission  
130 E. Randolph Drive, Suite 800  
Chicago, IL 60601  
[jwier@iadc.org](mailto:jwier@iadc.org)  
[srenfroe@iadc.org](mailto:srenfroe@iadc.org)  
[ARDCeService@iadc.org](mailto:ARDCeService@iadc.org)

PLEASE TAKE NOTICE that on August 6, 2022, I filed with the ARDC clerk Respondent’s Amended Complaint, a copy of which is enclosed herewith and served upon you.

  
\_\_\_\_\_  
Eddy Copot

**PROOF OF SERVICE BY ELECTRONIC MAIL**

I, Eddy Copot, an attorney, on oath, certify I served this notice and the document referred to therein, by causing a copy to be sent by electronic mail to the parties listed above at their above-entitled electronic mail addresses to [jwier@iadc.org](mailto:jwier@iadc.org), [srenfroe@iadc.org](mailto:srenfroe@iadc.org) and [ARDCeService@iadc.org](mailto:ARDCeService@iadc.org) from email address [copotlaw@outlook.com](mailto:copotlaw@outlook.com) set forth on or before 9:00 p.m. on August 6, 2022.

  
\_\_\_\_\_  
Eddy Copot  
Date: 8/6/22

FILED 8:00 alw  
8/8/2022 ~~12:00~~ AM  
ARDC Clerk

**CERTIFICATION PURSUANT TO 735 ILCS 5/1-109**

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

  
\_\_\_\_\_  
Eddy Copot

Eddy Copot  
6607 Western Avenue  
Willowbrook, IL 60527  
(630) 542-5151  
E-Mail Address: [copotlaw@outlook.com](mailto:copotlaw@outlook.com)

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

In the Matter of: )  
 )  
 EDDY COPOT )  
 )  
 Attorney-Respondent ) CASE NO: 2022PR00036  
 )  
 )

FILED 8:00 alw  
8/8/2022 ~~12:00~~ AM  
ARDC Clerk

**RESPONDENT’S VERIFIED AMENDED ANSWER TO THE COMPLAINT**

Eddy Copot, Attorney-Respondent, *pro se*, pursuant to the Rules of the Attorney Registration and Disciplinary Commission Rules 231 and 233, hereby responds to the Commission’s Complaint as follows:

**COUNT I**

1. Beginning on April 3, 2017, and until October 30, 2018, Respondent worked for Stewart Title Guaranty Company (“Stewart”) as claims counsel.

**ANSWER:** ADMITTED except DENIED Respondent’s employment ended October 30, 2018 because Stewart paid Respondent wages until October 31, 2018.

2. Stewart is a national real estate services company offering loan origination and servicing support, title insurance, and underwriting services for its customers.

**ANSWER:** Respondent is without information and knowledge sufficient to respond to this allegation, and therefore, deny the same.

3. In his role as claims counsel at Stewart, Respondent was responsible for processing claims for coverage submitted pursuant to title insurance policies issued or underwritten by Stewart.

**ANSWER:** Admit.

4. Stewart had a policy that claims counsel could not deny a claim submitted by an

insured unless his or her supervisor approved the denial of the claim in writing.

**ANSWER:** Respondent denies this allegation and demands strict proof thereof. To the extent the averments contained therein purport to characterize the terms of any document(s), Respondent denies such characterization and affirmatively states that those document(s) speak for themselves. Comfort letters and premature letters were denial letters used department wide and didn't need any additional supervisor approval each time they were used on a claim file and other claims personnel such as Maria Georgopoulos, Eleanor Sharpe, John Patti, Stephen Butler, Maria Stavrakos, Priscilla Bastic, Susan Woods, Tiki Velazquez (Anderson), Marina Boldt, Terrence Yarnall, Jonathan Van Broeck, Judy Millhone, and Mary Mitchell all verified to Respondent they followed this process. Ms. Rickenbach committed perjury when she falsely testified on January 18, 2021 that claims personnel needed her approval before issuing a comfort or premature letter because there is evidence her approval was not required such as when Tiki Velazquez issued a comfort letter on 8/2/2018 in Stewart's Batch#48890. According to Stewart's response to Respondent's Modified Document Request #84 in their federal case, between April 1, 2018 to July 2018, initial denial letters signed and approved by only claims counsel Michael Grujanac were sent to insured clients in the following batch numbers: STGC 0007736, STGC 0027533, STGC.0027843, STGC 0028432, STGC 0028543, STGC 0028750, STGC 0029063, STGC 0029140, STGC 0029623, and STGC 0030771. Additional initial denial letters signed and approved by only Michael Grujanac were sent to insured clients in the following batch numbers: STGC 24556, STGC 26988, STGC 28757, STGC 29073 which he solely denied on 4/19/2018 and again on 5/14/2018 in STGC 29140. Another unwritten policy instructed to Respondent by Stewart management to follow was if he received a request to reconsider after denying an insurance claim, any claims personnel including the Respondent can communicate another

written denial to the insured without supervisor approval if there were no new facts or no new policy interpretation given by the insured and other claims personnel such as Maria Georgopoulos, Eleanor Sharpe, John Patti, Stephen Butler, Maria Stavrakos, Priscilla Bastic, Susan Woods, Tiki Velazquez (Anderson), Marina Boldt, Terrence Yarnall, Jonathan Van Broeck, Judy Millhone, and Mary Mitchell all verified to Respondent they followed this process.

5. When a supervisor approved the denial of a claim by email, the claims counsel saved the email in the electronic claims file, which was referred to as the Legal Files System (“LFS”).

**ANSWER:** Respondent denies this allegation and demands strict proof thereof. When the claims files of one Stewart claims personnel were transferred to another, these inherited files would frustrate the receiver because it wasn’t a pattern and practice of every Stewart claims personnel to document all actions they took on a file and it became a guessing game many times for claims personnel to understand how they were to start work on the inherited files. The management in Stewart’s claims department failed to ever enforce the practice of everyone documenting all their work in the Legal Files database and failed to implement a secure Docu-sign type system where employees’ unique digital signatures can only be accessed with a secure passcode. Legal Files did not require access by claims personnel having their own log in credentials and Ms. Rickenbach previously testified on January 18, 2021 that not everything was documented in LFS.

6. The policy regarding written approvals was set forth in Stewart’s Claims Manual, and Stewart provided Respondent with a copy of that manual, which was also available electronically to employees during their tenure with Stewart.

**ANSWER:** Respondent denies this allegation and demands strict proof thereof. To the extent the averments contained therein purport to characterize the terms of any document(s), Respondent

denies such characterization and affirmatively states that those document(s) speak for themselves. The policy of premature letters and denials of requests for reconsideration were not written in Stewart's Claims Manual during Respondent's period of employment. Ms. Rickenbach committed perjury when she falsely testified on January 18, 2021 that the policy of premature letters was written in the claims manual.

*The Wolffe Claim*

7. In 2018, Respondent processed a claim brought against Stewart by Connie and Michael Wolffe (the "Wolffe Claim").

**ANSWER:** Respondent is without information and knowledge sufficient to respond to this allegation, and therefore, deny the same.

8. Stewart assigned the Wolffe Claim file number S023-0304448-18.

**ANSWER:** Respondent is without information and knowledge sufficient to respond to this allegation, and therefore, deny the same.

9. Rather than requesting that his supervisor, Kelly Rickenbach, approve the denial of the Wolffe Claim, Respondent falsified an email that purported to be her approval.

**ANSWER:** Respondent denies this allegation and demands strict proof thereof.

10. Specifically, on October 15, 2018, Respondent forwarded an email from Ms. Rickenbach in which she had approved his request for time off, and he altered the contents of the email.

**ANSWER:** Respondent denies this allegation and demands strict proof thereof.

11. Respondent altered the text and subject line of the forwarded email so that it falsely read as Ms. Rickenbach's authorization to deny the Wolffe Claim.

**ANSWER:** Respondent denies this allegation and demands strict proof thereof.

12. Respondent's email purporting to be Ms. Rickenbach's approval was false because Ms. Rickenbach had not sent Respondent an email regarding the Wolffe Claim, nor had she approved the denial of the Wolffe Claim.

**ANSWER:** Respondent denies this allegation and demands strict proof thereof. Ms. Rickenbach has a documented history of missing emails she sent or received such as her written admission on June 28, 2018 for file# S023-0284565-17 in Batch#35196. Ms. Rickenbach also committed perjury on August 18, 2021 when she falsely testified that she did not agree with the denial that was issued for this claim even though she did not reverse the denial decision and the claim was closed on November 29, 2018.

13. When Respondent sent the email, he knew that it was false because he had altered the email to make it appear as though Ms. Rickenbach had sent it to him, and he altered the subject line and content of the email to make it appear as though she had approved denial of the Wolffe Claim.

**ANSWER:** Respondent denies this allegation and demands strict proof thereof.

14. On October 16, 2018, Respondent sent a signed letter to the insureds denying the Wolffe Claim.

**ANSWER:** Respondent denies this allegation and demands strict proof thereof.

#### *The Beck-Quale Claim*

15. In 2018, Respondent processed a claim brought against Stewart by Byron Beck, Janice Beck, and Mark Quale (the "Beck-Quale Claim").

**ANSWER:** Respondent is without information and knowledge sufficient to respond to this allegation, and therefore, denies the same.

16. Stewart assigned the Beck-Quale Claim file number S023-0303925-18.

**ANSWER:** Respondent is without information and knowledge sufficient to respond to this allegation, and therefore, denies the same.

17. On September 28, 2018, Respondent sent an email to himself with the title “Denial 0303925.exception (6).”

**ANSWER:** Respondent denies this allegation and demands strict proof thereof. It was a pattern and practice of other claims personnel to email themselves in order to upload emails into the Legal Files database such as Tiki Velazquez who performed this action in Batch #3333, 16359, 41757, 41920, 42577, 42615, 43942, 43999, 44103, and 46681.

18. The email purported to be an email sent on September 27, 2018 at 1:31 p.m. from Kelly Rickenbach to Respondent.

**ANSWER:** Respondent denies this allegation and demands strict proof thereof.

19. That email purported to be Ms. Rickenbach’s approval for the denial of the Beck-Quale Claim.

**ANSWER:** Respondent denies this allegation and demands strict proof thereof.

20. The September 28, 2018 email was false because Ms. Rickenbach had not sent Respondent the email on September 27, 2018, nor had she approved denial of the Beck-Quale Claim.

**ANSWER:** Respondent denies this allegation and demands strict proof thereof. Ms. Rickenbach has a documented history of missing emails she sent or received such as her written admission on June 28, 2018 for file# S023-0284565-17 in Batch#35196. Ms. Rickenbach falsely made a prior inconsistent written statement when she stated to Mr. Scott McBee that she would have never approved denying this insurance claim even though she did not reverse the denial and the claim was closed on 11/29/2018.

21. Rather, Respondent drafted or altered the email to make it appear as though Ms. Rickenbach had sent him approval to deny the claim.

**ANSWER:** Respondent denies this allegation and demands strict proof thereof.

22. When Respondent sent himself the September 28, 2018 email, he knew that it was false because Ms. Rickenbach had not approved denial of the Beck-Quale Claim and had not sent the September 27, 2018 email to Respondent.

**ANSWER:** Respondent denies this allegation and demands strict proof thereof.

23. Rather, Respondent had altered the email to make it appear as though Ms. Rickenbach had approved denial of the Beck-Quale Claim.

**ANSWER:** Respondent denies this allegation and demands strict proof thereof.

24. On September 28, 2018, Respondent sent a signed letter to the insureds denying the Beck-Quale Claim.

**ANSWER:** Respondent denies this allegation and demands strict proof thereof.

*The Summit at Lake Union Apartments Claim*

25. In 2018, Respondent processed a claim brought against Stewart by The Summit at Lake Union Apartments, LLC (the “Summit Claim”).

**ANSWER:** Respondent is without information and knowledge sufficient to respond to this allegation, and therefore, denies the same.

26. Stewart assigned the Summit Claim file number S023-0304420-18.

**ANSWER:** Respondent is without information and knowledge sufficient to respond to this allegation, and therefore, denies the same.

27. On October 24, 2018, Respondent sent an email to himself with the title “Denial S023-0304420-18.”

**ANSWER:** Respondent denies this allegation and demands strict proof thereof. It was a pattern and practice of other claims personnel to email themselves in order to upload emails into the Legal Files database such as Tiki Velazquez who performed this action in Batch #3333, 16359, 41757, 41920, 42577, 42615, 43942, 43999, 44103, and 46681.

28. The email purported to be an email sent on October 18, 2018 at 1:17 p.m. from Kelly Rickenbach to Respondent.

**ANSWER:** Respondent denies this allegation and demands strict proof thereof.

29. That email purported to be Ms. Rickenbach's approval for the denial of the Summit Claim.

**ANSWER:** Respondent denies this allegation and demands strict proof thereof.

30. The October 24, 2018 email was false because Ms. Rickenbach had not sent Respondent the email on October 18, 2018, nor had she approved denial of the Summit Claim.

**ANSWER:** Respondent denies this allegation and demands strict proof thereof. Ms. Rickenbach has a documented history of missing emails she sent or received such as her written admission on June 28, 2018 for file# S023-0284565-17 in Batch#35196. Ms. Rickenbach also committed perjury on January 18, 2021 when she falsely testified that the denial was reversed at the request of Stewart when in reality the denial was reversed after a rebuttal was received from the insured on 11/24/2018 and then the claim was withdrawn by the insured a few weeks later on January 10, 2019.

31. Rather, Respondent drafted or altered the email to make it appear as though Ms. Rickenbach had sent him approval to deny the claim.

**ANSWER:** Respondent denies this allegation and demands strict proof thereof.

32. When Respondent sent himself the October 24, 2018 email, he knew that it was false because Ms. Rickenbach had not approved denial of the Summit Claim, nor had she sent the October 18, 2018 email to Respondent.

**ANSWER:** Respondent denies this allegation and demands strict proof thereof. Ms. Rickenbach has a documented history of missing emails she sent or received such as her written admission on June 28, 2018 for file# S023-0284565-17 in Batch#35196.

33. Rather, Respondent altered the email to make it appear as though Ms. Rickenbach had approved denial of the Summit Claim.

**ANSWER:** Respondent denies this allegation and demands strict proof thereof.

34. On October 24, 2018, Respondent sent a signed letter to the insured denying the Summit Claim.

**ANSWER:** Respondent denies this allegation and demands strict proof thereof.

35. On October 30, 2018, after discovering the false email relating to the Wolffe Claim described above, Stewart terminated Respondent's employment.

**ANSWER:** Respondent denies this allegation and demands strict proof thereof. This alleged reason is completely contrary to the pattern and practice of Respondent who consistently during his entire employment at Stewart, even days before his termination, on hundreds of files, followed company policies and communicated with Ms. Rickenbach or any other authorized official to obtain the necessary management approval before communicating a denial of an insurance claim to an insured customer. Emails to Kelly Rickenbach requesting review or management approval of proposed action by Respondent on a particular claim file between August 1, 2018 to October 30, 2018 include but are not limited to STGC 0000873, STGC 0002892, STGC 0003002, STGC 0003129, STGC 0003194, STGC 0003212, STGC 0003333,

STGC 0003356, STGC 0003445, STGC 0003464, STGC 0003501, STGC 3527, STGC 3536, STGC 0003555, STGC 0003561, STGC 3598, STGC 0003626, STGC 0003657, STGC 0003711, STGC 0003731, STGC 0003734, STGC 0003739, STGC 0003746, STGC 0003751, STGC 0003865, STGC 3874, STGC 0003911, STGC 0003927, STGC 0004124, and STGC 0004138. Additional documents produced by Stewart showing Respondent's emails to Rickenbach and/or Sharpe between June 2018-October 2018 and asking for review/approval on his files include STGC 459, STGC 1114, STGC 1168, STGC 1233, STGC 2681, STGC 2792, STGC 2811, STGC 2980, STGC 3034, STGC 3045, STGC 3129, STGC 3182, STGC 3212, STGC 3268, STGC 3524, STGC 3642, STGC 3696, STGC 3724, STGC 3762, STGC 3767, STGC 3772, STGC 3865, STGC 3874, STGC 3968, STGC 8129, STGC 14694, STGC 14835, STGC 18067, STGC 19537, STGC 33370, STGC 48083. On November 4, 2018, the Respondent filed a claim with the Illinois Department of Employment Security (hereinafter referred to as "IDES"). On November 16, 2018, IDES notified the Respondent that Stewart was contesting his eligibility for unemployment benefits due to alleged misconduct. On November 30, 2018, a full hearing was conducted into whether the Respondent had committed forgery and the hearings referee found that Stewart had discharged the Respondent for reasons other than misconduct.

36. Stewart then reviewed other claims files handled by Respondent and found that he had falsified the supervisor authorization emails relating to the Beck-Quale Claim and the Summit Claim.

**ANSWER:** Respondent denies this allegation and demands strict proof thereof. Paragraph 36 is a false statement because on October 25, 2018, Ms. Rickenbach emailed Scott McBee and

alleged Respondent falsified her authorization to deny claims relating to the Beck-Quale Claim and the Summit Claim.

37. 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 knowingly falsifying the September 28, 2018, October 15, 2018, and October 24, 2018 emails to make them appear to be approvals from Kelly Rickenbach for Respondent to deny the insureds' claims, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

**ANSWER:** Respondent denies this allegation and demands strict proof thereof.

Respondent reserves the right to amend its Answer to raise any defenses that may become available during the discovery process, as well as the right to assert affirmative defenses as established by the facts of the case.

**RESPONDENT'S DISCLOSURE PURSUANT TO COMMISSION RULE 231**

1. Respondent is admitted to practice law in the State of Illinois and has never been admitted to practice law before any other state court, federal court or administrative agency or admitted before the bar of any foreign country.
2. Respondent has received the following professional licenses or certificates:
  - a. Real Estate Broker, State of Illinois Department of Financial and Professional Regulation, Issued 8/29/2016 to Eddy Copot, license #475.171563
  - b. Law Enforcement Officer, Cook County Sheriff's Police Department, Issued 3/20/2008 to Eddy Copot
  - c. Title Insurance Agent, State of Illinois Department of Financial and Professional Regulation, Issued 8/6/2018 to Eddy Copot, license #TA.08.4003664
  - d. Title Insurance Agent, State of Illinois Department of Financial and Professional Regulation, Issued 1/25/2017 to Eddy Copot, license #TA.02.4001837

- e. Title Insurance Agent, State of Illinois Department of Financial and Professional Regulation, Issued 5/6/2015 to Eddy Copot, license #TA.18.1806399
- f. Title Insurance Agent, State of Illinois Department of Financial and Professional Regulation, Issued 5/1/2015 to Eddy Copot, license #TA.04.0406482

Dated: August 6, 2022

Respectfully submitted,

By: /s/ Eddy Copot

*Pro Se*

**CERTIFICATION PURSUANT TO 735 ILCS 5/2-610(b)**

Under penalties as provided by law pursuant to Section 2-610 of the Code of Civil Procedure, the undersigned certifies that the answers to the general allegations in paragraph #2, #7, #8, #15, #16, #25, #26 therein are based on not having enough information to otherwise answer the statements in these paragraphs and the undersigned certifies as aforesaid that he verily believes the same to be true.

FURTHER AFFIANT SAYETH NAUGHT.

Eddy Copot

Eddy Copot

**CERTIFICATION PURSUANT TO 735 ILCS 5/1-109**

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

  
\_\_\_\_\_  
Eddy Copot

Eddy Copot  
6607 Western Avenue  
Willowbrook, IL 60527  
(630) 542-5151  
E-Mail Address: [copotlaw@outlook.com](mailto:copotlaw@outlook.com)

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

In the Matter of: )  
)  
EDDY COPOT )  
) CASE NO: 2022PR00036  
Attorney-Respondent )  
)

**RESPONDENT’S AFFIDAVIT**  
**IN SUPPORT OF ITS AMENDED ANSWER TO THE COMPLAINT**

I, Eddy Copot, Attorney-Respondent, *pro se*, sworn on oath, depose and state as follows:

1. My name is Eddy Copot and I am the Attorney-Respondent in this case.
2. I have personal knowledge of the facts contained within this affidavit and could competently testify to them if called as a witness.
3. I certify that my answers to the general allegations in paragraph #2, #7, #8, #15, #16, #25, #26 are based on not having enough information to otherwise answer the statements in these paragraphs and I believe the same to be true.

**CERTIFICATION PURSUANT TO 735 ILCS 5/2-610(b)**

Under penalties as provided by law pursuant to Section 2-610 of the Code of Civil Procedure, the undersigned certifies that the answers to the general allegations in paragraph #2, #7, #8, #15, #16, #25, #26 therein are based on not having enough information to otherwise answer the statements in these paragraphs and the undersigned certifies as aforesaid that he verily believes the same to be true.

FURTHER AFFIANT SAYETH NAUGHT.

Eddy Copot

Eddy Copot

**CERTIFICATION PURSUANT TO 735 ILCS 5/1-109**

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Eddy Copot  
Eddy Copot

8/18/2022 \_\_\_\_\_  
Date