

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

In the Matter of:)	
)	
CHINYERE ALEX OGOKE,)	Commission No. 2022PR00073
)	
Attorney-Respondent,)	
)	
No. 6284533.)	

COMPLAINT

Jerome Larkin, Administrator of the Attorney Registration and Disciplinary Commission, by his attorney, Rory P. Quinn, pursuant to Supreme Court Rule 753(b), complains of Respondent Chinyere Alex Ogoke, who was licensed to practice law in Illinois on February 15, 2005, and alleges that Respondent has engaged in the following conduct which subjects Respondent to discipline pursuant to Supreme Court Rule 770:

ALLEGATIONS COMMON TO ALL COUNTS

1. On September 16, 2019, the Illinois Supreme Court entered an order suspending Respondent from the practice of law for 21 months, with the suspension stayed after nine months by a 12-month period of probation. The suspension became effective on October 21, 2019. Respondent was suspended from practicing law in Illinois from October 21, 2019 until July 21, 2021. Respondent was subject to probation conditions in Illinois from July 21, 2021 until July 2, 2021

2. On August 20, 2020, the United States Department of Justice Board of Immigration Appeals (“the Board”) granted a petition for immediate interim suspension of Respondent based

on his Illinois discipline. The Board's decision suspended Respondent from practice before the Board, the Immigration Courts, and the Department of Homeland Security ("DHS") as of that date.

3. On September 29, 2020, the Board ordered Respondent be suspended from the practice of law before the Board, the Immigration Courts, and DHS for nine months, effective August 20, 2020.

4. At all times relevant to the complaint, Respondent was not authorized to practice law before the Board, the Immigration Courts, and the Department of Homeland Security

COUNT I

(Unauthorized Practice of Law, False Statements to a Tribunal)

5. On September 4, 2020, Respondent filed a Notice of Entry of Appearance Form G-28 before the U.S. Citizenship and Immigration Services ("USCIS") on behalf of Aidara Ali Yerima.

6. Question 1c on Form G-28 required Respondent select the box that applied to his practice of law. The question read as follows:

I (select only one box) am not am subject to any order suspending, enjoining, restraining, disbaring, or otherwise restricting me in the practice of law.

7. Respondent marked the check box that stated "I am not."

8. Respondent's statement to the USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was false because Respondent was suspended from practicing law before USCIS on August 20, 2020.

9. Respondent knew his statement was false because Respondent knew he was suspended from practicing law before USCIS on August 20, 2020.

10. Respondent's statement to USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was also false because Respondent was subject to probationary conditions while practicing law in Illinois on September 4, 2020.

11. Respondent knew his statement to USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting me in the practice of law was also false because Respondent knew he was subject to probationary conditions while practicing law in Illinois on August 31, 2020.

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

- a. knowingly making a false statement of fact or law to a tribunal or failing to correct a false statement of material fact or law previously made to the tribunal by the lawyer, by conduct including filing with USCIS a Notice of Entry of Appearance that contained a false statement in violation of Rule 3.3(a)(1) of the Illinois Rules of Professional Conduct (2020);
- b. practicing law in a jurisdiction in violation of the regulation of the legal profession in that jurisdiction, by representing Aidara Ali Yerim in her immigration matter and holding himself out as an attorney to Aidara Ali Yerim after he was suspended from practicing law before USCIS, in violation of Rule 5.5(a) of the Illinois Rules of Professional Conduct (2010); and
- c. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including knowingly filing with USCIS a Notice of Entry of Appearance that contained a false statement, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

COUNT II
(Unauthorized Practice of Law, False Statements to a Tribunal)

13. On or before July 13, 2020, Respondent met with William U. Denson (“Denson”). Respondent drafted and had Denson sign a Notice of Entry of Appearance Form G-28.

14. On September 14, 2020 Respondent filed the Notice of Entry of Appearance Form G-28 before the USCIS on behalf of Denson.

15. Question 1c on Form G-28 required Respondent select the box that applied to his practice of law. The question read as follows:

I (select only one box) am not am subject to any order suspending, enjoining, restraining, disbaring, or otherwise restricting me in the practice of law.

16. Respondent marked the check box that stated “I am not.”

17. Respondent’s statement to the USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was false because Respondent was suspended from practicing law before USCIS on August 20, 2020.

18. Respondent knew his statement was false because Respondent knew he was suspended from practicing law before USCIS on August 20, 2020.

19. Respondent’s statement to USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was also false because Respondent was subject to probationary conditions while practicing law in Illinois on March 25, 2021.

20. Respondent knew his statement to USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law

was also false because Respondent knew he was subject to probationary conditions while practicing law in Illinois on March 25, 2021.

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

- a. knowingly making a false statement of fact or law to a tribunal or failing to correct a false statement of material fact or law previously made to the tribunal by the lawyer, by conduct including filing with USCIS a Notice of Entry of Appearance that contained a false statement in violation of Rule 3.3(a)(1) of the Illinois Rules of Professional Conduct (2020);
- b. practicing law in a jurisdiction in violation of the regulation of the legal profession in that jurisdiction, by representing William U. Denson in his immigration matter and holding himself out as an attorney to William U. Denson while he was suspended in Illinois and after he was suspended from practicing law before USCIS, in violation of Rule 5.5(a) of the Illinois Rules of Professional Conduct (2010); and knowingly filing with USCIS a Notice of Entry of Appearance that contained a false statement, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).
- c. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including knowingly filing with USCIS a Notice of Entry of Appearance that contained a false statement, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

COUNT III

(Unauthorized Practice of Law, False Statements to a Tribunal)

22. On or before July 13, 2020, Respondent met with Benedette Afiachukwu Egwuenu (“Egwuenu”). Respondent drafted and had Egwuenu sign a Notice of Entry of Appearance Form G-28.

23. On September 14, 2020, Respondent filed the Notice of Entry of Appearance Form G-28 before USCIS on behalf of Egwuenu.

24. Question 1c on Form G-28 asked Respondent whether he was subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law.

25. Question 1c on Form G-28 required Respondent select the box that applied to his practice of law. The question read as follows:

I (select only one box) am not am subject to any order suspending, enjoining, restraining, disbaring, or otherwise restricting me in the practice of law.

26. Respondent marked the check box that stated “I am not.”

27. Respondent’s statement to the USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was false because Respondent was suspended from practicing law before USCIS on August 20, 2020.

28. Respondent knew his statement was false because Respondent knew he was suspended from practicing law before USCIS on August 20, 2020.

29. Respondent’s statement to USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was also false because Respondent was subject to probationary conditions while practicing law in Illinois on September 14, 2020.

30. Respondent knew his statement to USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was also false because Respondent knew he was subject to probationary conditions while practicing law in Illinois on September 14, 2020.

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

- a. knowingly making a false statement of fact or law to a tribunal or failing to correct a false statement of material fact or law previously made to the tribunal by the lawyer, by conduct including filing with USCIS a Notice of Entry of Appearance that contained a false statement in violation of Rule 3.3(a)(1) of the Illinois Rules of Professional Conduct (2020);
- b. practicing law in a jurisdiction in violation of the regulation of the legal profession in that jurisdiction, by representing Benedette Afiachukwu Egwuenu in his immigration matter and holding himself out as an attorney to Benedette Afiachukwu Egwuenu while he was suspended in Illinois and after he was suspended from practicing law before USCIS, in violation of Rule 5.5(a) of the Illinois Rules of Professional Conduct (2010); and
- c. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including knowingly filing with USCIS a Notice of Entry of Appearance that contained a false statement, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

COUNT IV

(Unauthorized Practice of Law, False Statements to a Tribunal)

32. On October 1, 2020, Respondent filed a Notice of Entry of Appearance Form G-28 before the USCIS on behalf of Oreofe Paul Olabisi.

33. Question 1c on Form G-28 required Respondent select the box that applied to his practice of law. The question read as follows:

I (select only one box) am not am subject to any order suspending, enjoining, restraining, disbaring, or otherwise restricting me in the practice of law.

34. Respondent marked the check box that stated “I am not.”

35. Respondent's statement to the USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was false because Respondent was suspended from practicing law before USCIS on August 20, 2020.

36. Respondent knew his statement was false because Respondent knew he was suspended from practicing law before USCIS on August 20, 2020.

37. Respondent's statement to USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was also false because Respondent was subject to probationary conditions while practicing law in Illinois on October 1, 2020.

38. Respondent knew his statement to USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was also false because Respondent knew he was subject to probationary conditions while practicing law in Illinois on October 1, 2020.

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

- a. knowingly making a false statement of fact or law to a tribunal or failing to correct a false statement of material fact or law previously made to the tribunal by the lawyer, by conduct including filing with USCIS a Notice of Entry of Appearance that contained a false statement in violation of Rule 3.3(a)(1) of the Illinois Rules of Professional Conduct (2020);
- b. practicing law in a jurisdiction in violation of the regulation of the legal profession in that jurisdiction, by representing Oreofe Paul Olabisi in his immigration matter and holding himself out as an attorney to Oreofe Paul Olabisi after he was suspended from practicing law before USCIS, in violation of

Rule 5.5(a) of the Illinois Rules of Professional Conduct (2010); and

- c. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including knowingly filing with USCIS a Notice of Entry of Appearance that contained a false statement, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

COUNT V

(Unauthorized Practice of Law, False Statements to a Tribunal)

40. On October 1, 2020 Respondent filed a Notice of Entry of Appearance Form G-28 before the USCIS on behalf of Flourish Momoreoluwa Olabisi.

41. Question 1c on Form G-28 required Respondent select the box that applied to his practice of law. The question read as follows:

I (select only one box) am not am subject to any order suspending, enjoining, restraining, disbaring, or otherwise restricting me in the practice of law.

42. Respondent marked the check box that stated “I am not.”

43. Respondent’s statement to the USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was false because Respondent was suspended from practicing law before USCIS on August 20, 2020.

44. Respondent knew his statement was false because Respondent knew he was suspended from practicing law before USCIS on August 20, 2020.

45. Respondent’s statement to USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was also false because Respondent was subject to probationary conditions while practicing law in Illinois on October 1, 2020.

46. Respondent knew his statement to USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was also false because Respondent knew he was subject to probationary conditions while practicing law in Illinois on October 1, 2020.

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

- a. knowingly making a false statement of fact or law to a tribunal or failing to correct a false statement of material fact or law previously made to the tribunal by the lawyer, by conduct including filing with USCIS a Notice of Entry of Appearance that contained a false statement in violation of Rule 3.3(a)(1) of the Illinois Rules of Professional Conduct (2020);
- b. practicing law in a jurisdiction in violation of the regulation of the legal profession in that jurisdiction, by representing Flourish Momoreoluwa Olabisi in her immigration matter and holding himself out as an attorney to Flourish Momoreoluwa Olabisi after he was suspended from practicing law before USCIS, in violation of Rule 5.5(a) of the Illinois Rules of Professional Conduct (2010); and
- c. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including knowingly filing with USCIS a Notice of Entry of Appearance that contained a false statement, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

COUNT VI

(Unauthorized Practice of Law, False Statements to a Tribunal)

48. On December 12, 2020 Respondent filed a Notice of Entry of Appearance Form G-28 before the USCIS on behalf of Olalere Atanda Olabisi.

49. Question 1c on Form G-28 required Respondent select the box that applied to his practice of law. The question read as follows:

I (select only one box) am not am subject to any order suspending, enjoining, restraining, disbaring, or otherwise restricting me in the practice of law.

50. Respondent marked the check box that stated “I am not.”

51. Respondent’s statement to the USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was false because Respondent was suspended from practicing law before USCIS on August 20, 2020.

52. Respondent knew his statement was false because Respondent knew he was suspended from practicing law before USCIS on August 20, 2020.

53. Respondent’s statement to USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was also false because Respondent was subject to probationary conditions while practicing law in Illinois on December 12, 2020.

54. Respondent knew his statement to USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was also false because Respondent knew he was subject to probationary conditions while practicing law in Illinois on December 12, 2020.

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

- a. knowingly making a false statement of fact or law to a tribunal or failing to correct a false statement of material fact or law previously made to the tribunal by the lawyer, by conduct including filing with USCIS a Notice of Entry of Appearance that contained a false statement in violation of Rule 3.3(a)(1) of the Illinois Rules of Professional Conduct (2020);

- b. practicing law in a jurisdiction in violation of the regulation of the legal profession in that jurisdiction, by representing Olalere Atanda Olabisi in their immigration matter and holding himself out as an attorney to Olalere Atanda Olabisi after he was suspended from practicing law before USCIS, in violation of Rule 5.5(a) of the Illinois Rules of Professional Conduct (2010); and
- c. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including knowingly filing with USCIS a Notice of Entry of Appearance that contained a false statement, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

COUNT VII

(Unauthorized Practice of Law, False Statements to a Tribunal)

56. On December 16, 2020, Respondent filed Notice of Entry of Appearance Form G-28 before the USCIS on behalf of Kafayat Asepeju Yarrow.

57. Question 1c on Form G-28 required Respondent select the box that applied to his practice of law. The question read as follows:

I (select only one box) am not am subject to any order suspending, enjoining, restraining, disbaring, or otherwise restricting me in the practice of law.

58. Respondent marked the check box that stated “I am not.”

59. Respondent’s statement to the USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was false because Respondent was suspended from practicing law before USCIS on August 20, 2020.

60. Respondent knew his statement was false because Respondent knew he was suspended from practicing law before USCIS on August 20, 2020.

61. Respondent's statement to USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was also false because Respondent was subject to probationary conditions while practicing law in Illinois on December 16, 2020.

62. Respondent knew his statement to USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was also false because Respondent knew he was subject to probationary conditions while practicing law in Illinois on December 16, 2020.

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

- a. knowingly making a false statement of fact or law to a tribunal or failing to correct a false statement of material fact or law previously made to the tribunal by the lawyer, by conduct including filing with USCIS a Notice of Entry of Appearance that contained a false statement in violation of Rule 3.3(a)(1) of the Illinois Rules of Professional Conduct (2020);
- b. practicing law in a jurisdiction in violation of the regulation of the legal profession in that jurisdiction, by representing Kafayat Asepeju Yarrow in his immigration matter and holding himself out as an attorney to Kafayat Asepeju Yarrow after he was suspended from practicing law before USCIS, in violation of Rule 5.5(a) of the Illinois Rules of Professional Conduct (2010); and
- c. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including knowingly filing with USCIS a Notice of Entry of Appearance that contained a false statement, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

COUNT VIII
(Unauthorized Practice of Law, False Statements to a Tribunal)

64. On February 21, 2021, Respondent filed Notice of Entry of Appearance Form G-28 before the USCIS on behalf of Yemisi Sanusi-Robinson Jr.

65. Question 1c on Form G-28 required Respondent select the box that applied to his practice of law. The question read as follows:

I (select only one box) am not am subject to any order suspending, enjoining, restraining, disbaring, or otherwise restricting me in the practice of law.

66. Respondent marked the check box that stated “I am not.”

67. Respondent’s statement to the USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was false because Respondent was suspended from practicing law before USCIS on August 20, 2020.

68. Respondent knew his statement was false because Respondent knew he was suspended from practicing law before USCIS on August 20, 2020.

69. Respondent’s statement to USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was also false because Respondent was subject to probationary conditions while practicing law in Illinois on February 21, 2021.

70. Respondent knew his statement to USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was also false because Respondent knew he was subject to probationary conditions while practicing law in Illinois on February 21, 2021.

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

- a. knowingly making a false statement of fact or law to a tribunal or failing to correct a false statement of material fact or law previously made to the tribunal by the lawyer, by conduct including filing with USCIS a Notice of Entry of Appearance that contained a false statement in violation of Rule 3.3(a)(1) of the Illinois Rules of Professional Conduct (2020);
- b. practicing law in a jurisdiction in violation of the regulation of the legal profession in that jurisdiction, by representing Yemisi Sanusi-Robinson Jr. in his immigration matter and holding himself out as an attorney to Yemisi Sanusi-Robinson Jr. after he was suspended from practicing law before USCIS, in violation of Rule 5.5(a) of the Illinois Rules of Professional Conduct (2010); and
- c. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including knowingly filing with USCIS a Notice of Entry of Appearance that contained a false statement, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

COUNT IX

(Unauthorized Practice of Law, False Statements to a Tribunal)

72. On March 1, 2021, Respondent filed Notice of Entry of Appearance Form G-28 before the USCIS on behalf of Tetevi Gbikpi-Benissan.

73. Question 1c on Form G-28 required Respondent select the box that applied to his practice of law. The question read as follows:

I (select only one box) am not am subject to any order suspending, enjoining, restraining, disbaring, or otherwise restricting me in the practice of law.

74. Respondent marked the check box that stated “I am not.”

75. Respondent's statement to the USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was false because Respondent was suspended from practicing law before USCIS on August 20, 2020.

76. Respondent knew his statement was false because Respondent knew he was suspended from practicing law before USCIS on August 20, 2020.

77. Respondent's statement to USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was also false because Respondent was subject to probationary conditions while practicing law in Illinois on March 1, 2021.

78. Respondent knew his statement to USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was also false because Respondent knew he was subject to probationary conditions while practicing law in Illinois on March 1, 2021.

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

- a. knowingly making a false statement of fact or law to a tribunal or failing to correct a false statement of material fact or law previously made to the tribunal by the lawyer, by conduct including filing with USCIS a Notice of Entry of Appearance that contained a false statement in violation of Rule 3.3(a)(1) of the Illinois Rules of Professional Conduct (2020);
- b. practicing law in a jurisdiction in violation of the regulation of the legal profession in that jurisdiction, by representing Tetevi Gbikpi-Benissan in his immigration matter and holding himself out as an attorney to Tetevi Gbikpi-Benissan after he was suspended from practicing law before USCIS,

in violation of Rule 5.5(a) of the Illinois Rules of Professional Conduct (2010); and

- c. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including knowingly filing with USCIS a Notice of Entry of Appearance that contained a false statement, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

COUNT X

(Unauthorized Practice of Law, False Statements to a Tribunal)

80. On March 17, 2021 Respondent filed Notice of Entry of Appearance Form G-28 before the USCIS on behalf of Mofoluwasho Sarah Lindsey.

81. Question 1c on Form G-28 required Respondent select the box that applied to his practice of law. The question read as follows:

I (select only one box) am not am subject to any order suspending, enjoining, restraining, disbaring, or otherwise restricting me in the practice of law.

82. Respondent marked the check box that stated “I am not.”

83. Respondent’s statement to the USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was false because Respondent was suspended from practicing law before USCIS on August 20, 2020.

84. Respondent knew his statement was false because Respondent knew he was suspended from practicing law before USCIS on August 20, 2020.

85. Respondent’s statement to USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was also false because Respondent was subject to probationary conditions while practicing law in Illinois on March 15, 2021.

86. Respondent knew his statement to USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was also false because Respondent knew he was subject to probationary conditions while practicing law in Illinois on March 17, 2021.

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

- a. knowingly making a false statement of fact or law to a tribunal or failing to correct a false statement of material fact or law previously made to the tribunal by the lawyer, by conduct including filing with USCIS a Notice of Entry of Appearance that contained a false statement in violation of Rule 3.3(a)(1) of the Illinois Rules of Professional Conduct (2020);
- b. practicing law in a jurisdiction in violation of the regulation of the legal profession in that jurisdiction, by representing Mofoluwasho Sarah Lindsey in her immigration matter and holding himself out as an attorney to Mofoluwasho Sarah Lindsey after he was suspended from practicing law before USCIS, in violation of Rule 5.5(a) of the Illinois Rules of Professional Conduct (2010); and
- c. including knowingly filing with USCIS a Notice of Entry of Appearance that contained a false statement, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

COUNT XI

(Unauthorized Practice of Law, False Statements to a Tribunal)

88. On March 25, 2021 Respondent filed Notice of Entry of Appearance Form G-28 before the USCIS on behalf of Oluwagbenga David Adeyemi.

89. Question 1c on Form G-28 required Respondent select the box that applied to his practice of law. The question read as follows:

I (select only one box) am not am subject to any order suspending, enjoining, restraining, disbaring, or otherwise restricting me in the practice of law.

90. Respondent marked the check box that stated “I am not.”

91. Respondent’s statement to the USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was false because Respondent was suspended from practicing law before USCIS on August 20, 2020.

92. Respondent knew his statement was false because Respondent knew he was suspended from practicing law before USCIS on August 20, 2020.

93. Respondent’s statement to USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was also false because Respondent was subject to probationary conditions while practicing law in Illinois on March 25, 2021.

94. Respondent knew his statement to USCIS that he was not subject to an order suspending, enjoining, restraining, disbaring, or otherwise restricting him in the practice of law was also false because Respondent knew he was subject to probationary conditions while practicing law in Illinois on March 25, 2021.

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

- a. knowingly making a false statement of fact or law to a tribunal or failing to correct a false statement of material fact or law previously made to the tribunal by the lawyer, by conduct including filing with USCIS a Notice of Entry of Appearance that contained a false statement in violation of Rule 3.3(a)(1) of the Illinois Rules of Professional Conduct (2020);

- b. practicing law in a jurisdiction in violation of the regulation of the legal profession in that jurisdiction, by representing Oluwagbenga David Adeyemi in her immigration matter and holding himself out as an attorney to Oluwagbenga David Adeyemi after he was suspended from practicing law before USCIS, in violation of Rule 5.5(a) of the Illinois Rules of Professional Conduct (2010); and
- c. including knowingly filing with USCIS a Notice of Entry of Appearance that contained a false statement, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

COUNT XII

(Failure to cooperate with a disciplinary investigation)

96. On August 13, 2021, the Administrator sent Respondent an email at the email address Respondent registered with the ARDC. The email requested a written response to the above matters.

97. On November 12, 2021, Respondent emailed the Administrator and requested an additional 14 days to respond. The Administrator granted Respondent an additional 14 days and requested convenient dates for a sworn statement.

98. At no time did Respondent submit a written response to the Administrator's August 13th email or provide convenient dates for a sworn statement.

99. On June 16, 2022, the Administrator served Respondent with a subpoena to appear for a sworn statement on July 5, 2022, via the digital platform Microsoft Teams. The Administrator personally served the subpoena on Respondent. The subpoena commanded Respondent to appear before the Administrator via Microsoft Teams on July 5, 2022 at 1:00 p.m. Respondent received the subpoena but did not appear for the sworn statement.

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

- a. knowingly failing to respond to a lawful demand for information from a disciplinary authority by conduct including failing to respond to the Administrator's August 13, 2021 email, and failing to appear for his July 5, 2022 sworn statement, in violation of Rule 8.1(b) 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

Jerome Larkin, Administrator
Attorney Registration and
Disciplinary Commission

By: /s/ Rory P. Quinn
Rory P. Quinn

Rory P. Quinn
Counsel for the Administrator
One Prudential Plaza
130 East Randolph Drive, Suite 1500
Chicago, Illinois 60601-6219
Telephone: (312) 565-2600
E-mail: rquinn@iadc.org
E-mail: ARDCeService@iadc.org
MAINLIB-#1510376-v1