

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

In the Matter of:)	
)	
WILLIAM E. KOFFIE, JR.,)	
)	
Attorney-Respondent)	
No. 6298182)	Commission No. 2018PR00051
)	

NOTICE OF FILINGS

PLEASE TAKE NOTE that on July 4, 2025, an electronic copy of the ANSWERS TO AMENDED COMPLAINT were submitted to the clerk of the Attorney Registration and Disciplinary Commission in Chicago, Illinois for filing. On the same date, copies were served via email to Counsels for Administrator at ARDCeService@ardc.org; . ; jwier@ardc.org.

Respectfully submitted:

By: */S/Saani Mohammed*
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FILED
 7/8/2025 9:04 AM
 ARDC Clerk

PROOF OF SERVICE

The undersigned, an attorney, hereby certifies, pursuant to Illinois Code of Civil Procedure, 735 ILCS 5/109, that the Respondent served copies of the Notice of Filing and the RESPONDENT REPORT PURSUANT TO COMMISSION RULE 253 on the individuals on the forgoing Notice of Filing, sent via e-mail on July 4, 2025.

Under penalty 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 much as to such matters undersigned certifies as to aforesaid that he verily believes the same to be true.

/S/Saani Mohammed
Saani Mohammed, Esq

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**RESPONDENT'S ANSWER TO FIRST AMENDED COMPLAINT AND AFFIRMATIVE
DEFENSE**

NOW COMES the Respondent, WILLIAM E. KOFFIE, JR. (Mr. Koffie), by and through his attorney Saani Mohammed. Esq. of Mohammed-Law LLC, and in response to the Administrator of Attorney Registration and Disciplinary Commission (ARDC) as follows:

COUNT I

*(Lack of diligence, failure to expedite litigation, not keeping a client reasonably informed,
Making a false statement in the Clark matter)*

1. On July 17, 2015, "LC" was injured while shopping at a Cosmos Beauty Supply Store ("Cosmos") on South King Drive in Chicago, when she stepped on a needle that penetrated through her foot. LC was then taken via ambulance to Mercy Hospital for treatment. At the hospital, doctors took x-rays of LC's foot, they put her foot in a cast and prescribed her medicines, as well. LC later required follow-up treatment because of the cast.

Answer: Respondent admits these allegations.

2. At some time thereafter, but prior to December 4, 2015, LC contacted Respondent and asked Respondent to pursue a personal injury claim for her against Cosmos. Respondent and LC verbally agreed that Respondent would represent LC through the conclusion of the matter, and that LC would pay Respondent an initial fee of \$400, which Clark paid in cash.

Answer: Respondent admits these allegations.

3. On December 4, 2015, Respondent filed a complaint against Cosmos to initiate the matter, entitled [LC] v. Cosmos Beauty Supply Store in the Municipal Department of the Circuit Court of Cook County. On January 7, 2016, attorneys at the law firm of Bollinger, Connolly, Krause, LLC ("the Bollinger firm") filed the firm's appearance as counsel for Cosmos.

Answer: Respondent admits these allegations.

4. On January 29, 2016, on the Bollinger firm's motion, the Honorable Jerry Esrig entered an order in the LC case granting Cosmos leave to file an answer within 28 days, requiring the parties to complete discovery by April 22, 2016, and directing that LC case would be sent to the Cook County Arbitration Center after discovery closed on April 22, 2016 . Shortly thereafter, Respondent received a copy of the order.

Answer: Respondent denies receiving a copy of the order and does not have sufficient information to respond to the rest of the allegations.

5. As of February 3, 2016, the Bollinger firm served Respondent with written discovery requests, including interrogatories and a notice to produce, and also filed a notice of deposition scheduling LC's discovery deposition for March 31, 2016. At that time, the firm filed a motion to strike and dismiss Clark's complaint, arguing that Respondent had improperly pled negligence and premises liability in one count instead of pleading them with specificity in two separate counts. Cosmos also asserted that Respondent had filed the complaint in the wrong division, since the limit on monetary damages in the municipal division was \$30,000 and Respondent was seeking over \$30,000 on LC's behalf. Cosmos noticed the motion for a hearing on February 17, 2016, and Respondent received notice of it shortly thereafter.

Answer: Respondent denies being served with any discovery requests.

6. As of February 17, 2016, Respondent had not filed a response to Cosmos' motion to strike and dismiss. On February 17, 2016, Respondent did not appear before Judge Esrig on the hearing in the LC case. An attorney from the Bollinger firm appeared on Cosmos' behalf, but Judge Esrig denied Cosmos' motion.

Answer: Respondent admits these allegations.

7. As of February 25, 2016, Cosmos filed its answer and affirmative defenses, denying many of the allegations in LC's complaint.

Answer: Respondent admits these allegations.

8. On March 4, 2016, Respondent had not responded to the discovery requests filed and served on Cosmos' behalf on February 3, 2016, although the responses would have been due 28 days after they were served. On March 4, 2016, the Bollinger firm sent Respondent a letter pursuant to Supreme Court Rule 201(k) requesting that Clark comply with the defendant's outstanding discovery requests. The Bollinger firm also called Respondent at least three times to discuss the Clark case, but had been unable to reach him because he did not answer the calls, and his voice mailbox was full.

Answer: Respondent does not have enough information to respond to these allegations.

9. As of March 22, 2016, Respondent had not taken any action on LC's behalf to respond to Cosmos' discovery requests, nor had he responded to Cosmos' 201(k) letter or otherwise communicated with the Bollinger firm regarding discovery in the LC's case.

Answer: Respondent denies these allegations.

10. On March 22, 2016, Cosmos filed a motion to compel LC to answer the interrogatories, respond to the notice to produce and appear for a deposition. The Bollinger firm

noticed a hearing on the motion to compel for April 1, 2016. Respondent received the motion and notice of hearing shortly thereafter, but did not respond to them at any time.

Answer: Respondent denies receiving a motion and notice of hearing and does not have sufficient information to respond to the rest of the allegations.

11. As of April 1, 2016, Respondent had not answered Cosmos' discovery requests and had not responded to the motion to compel. On that day, an attorney from the Bollinger firm appeared before Judge Esrig to argue the motion to compel, but Respondent was not present. Judge Esrig granted the motion to compel and gave LC until April 8, 2016, to answer the outstanding discovery requests, but the order did not address the scheduling of LC's deposition. Respondent received a copy of Judge Esrig's April 1, 2016, order shortly thereafter.

Answer: Respondent denies receiving a copy of the Judge's April 1, 2016, order, and does not have sufficient information to respond to the rest of the allegations.

12. As of April 18, 2016, Respondent had not taken any action on LC's behalf to comply with discovery requests. As of that date, Respondent also had not spoken to LC about the outstanding discovery, nor had he notified LC of her obligation to appear for a deposition.

Answer: Respondent denies these allegations.

13. On April 18, 2016, Respondent sent an email on the LC's case to a secretary at the Bollinger firm, seeking to schedule LC's deposition. In his email, Respondent said that LC "had some last minute scheduling conflicts" that precluded her from appearing for her deposition on an earlier date, and asked to schedule LC's deposition for Thursday, April 21, 2016. In that email, Respondent also said that he would be forwarding LC's discovery responses to the secretary.

Answer: Respondent admits these allegations.

14. Respondent's email to secretary at the Bollinger firm concerning LC's availability for her deposition was false, because Respondent had not spoken to LC, and LC, who would have been available on the date that the deposition was originally scheduled, had not told Respondent that she "had some last minute scheduling conflicts."

Answer: Respondent denies these allegations.

15. At the time that Respondent sent his email to the secretary at the Bollinger firm, Respondent knew that his email was false and knew that he had not spoken to LC about the scheduled deposition, nor had LC told Respondent that she had "some last minute scheduling conflicts."

Answer: Respondent denies these allegations.

16. As of April 19, 2016, Respondent had not spoken to LC about the outstanding discovery, nor had he forwarded LC's discovery responses to Frank or presented LC for a deposition.

Answer: Respondent denies these allegations.

17. On April 19, 2016, Cosmos filed and served upon Respondent an emergency motion for sanctions, asking the court to dismiss LC's case for failure to comply with the April 1, 2016 order, and also filed a motion to extend the discovery cut-off date on the grounds that Cosmos disputed liability and needed to complete discovery. Cosmos noticed both of the motions for a hearing date of April 22, 2016. Respondent received notice of the motions and hearing date shortly thereafter.

Answer: Respondent denies receiving a copy of any motion and a notice of hearing and does not have sufficient information to respond to the rest of the allegations.

18. On April 22, 2016, Cosmos' attorney appeared before Judge Esrig. Respondent had not filed responses to Cosmos' motion and did not appear. On that day, Judge Esrig entered and continued Cosmos' motion for sanctions and motion to extend the all discovery closure date. Cosmos re-filed those motions on May 2, 2016, and served those motions upon Respondent, noticing the motions for a hearing on May 11, 2016. Respondent received notice of the re-filed motions and re-noticed hearing date shortly thereafter.

Answer: Respondent denies receiving a motion and a notice of hearing and does not have sufficient information to respond to the rest of the allegations.

19. As of May 11, 2016, Respondent still had not asked LC to assist him in answering, reviewing or signing her discovery responses, nor had Respondent ever asked LC to appear for a deposition.

Answer: Respondent denies these allegations.

20. On May 11, 2016, the Honorable Sheryl Ann Pethers dismissed LC's case with prejudice. As a result, LC's claims against Cosmos were barred. Respondent received a copy of the order shortly thereafter but did not tell LC of the dismissal.

Answer: Respondent denies receiving a copy of the May 11, 2016, order shortly after it was entered, and does not have sufficient information to respond to the rest of the allegations.

21. On June 13, 2016, Respondent filled out a one-page, pre-printed motion form that he obtained from the Circuit Court Clerk's office, seeking to vacate the May 11, 2016 dismissal with prejudice. Respondent did not provide any basis for his request, nor did he attach any exhibits to the motion. Respondent noticed the motion for a hearing on July 21, 2016 and sent the Bollinger firm a copy, which the firm received shortly thereafter.

Answer: Respondent admits filing a motion but dies the allegation that he “did not provide any basis for his request.”

22. On July 21, 2016, neither Respondent, LC, nor anyone on her behalf were present in court to present the motion to vacate the May 11, 2016 order that dismissed LC's case with prejudice. On that day, Judge Pethers struck Respondent's motion to vacate.

Answer: Respondent denies the allegation that he did not have a good faith basis for file his motion.

23. During the time that Respondent represented LC, LC called or texted Respondent approximately once per week asking about the status of her case. Respondent received those messages, but did not respond to his client's attempts to contact him.

Answer: Respondent denies these allegations.

24. Sometime after LC's case was dismissed with prejudice, Respondent and LC met and spoke. In that conversation, Respondent apologized to LC for his handling of her case and said that he would reimburse her for the \$400 in fees that she had paid him. As of June 27, 2018, the date an investigation of Clark's charges against Respondent was referred to a panel of the Inquiry Board, Respondent had not returned any funds to LC.

Answer: Respondent denies in part. Respondent gave Clark \$1000.00.

25. 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 not filing any pleadings, discovery or other responses after filing LC's complaint and failing to appear in court on February 17, 2016, April 1, 2016, April 22, 2016, and July 21, 2016 in violation of Rule 1.3 of the Illinois Rules of Professional Conduct (2010);

answer: Respondent denies these allegations.

- b. failing to keep the client reasonably informed about the status of the matter, by conduct including not responding to LC's telephone calls or text messages asking about the status of her case; not advising LC about the status of her case,

including the outstanding discovery that was overdue; and failing to notify LC of her obligation to appear for a disposition or dismissal of her case, in violation of Rules 1.4(a)(2) and 1.4(a)(3) of the Illinois Rules of Professional Conduct (2010); and

answer: Respondent denies these allegations.

- c. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including making a false statement to the Bollinger firm secretary regarding LC's availability for a deposition when he had not spoken to his client about her availability for the deposition, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

Answer: Respondent denies these allegations.

COUNT II
(Failure to cooperate with an ARDC investigation)

26. On January 23, 2017, the Administrator received a request for investigation from LC alleging that Respondent had neglected LC's personal injury case. After reviewing the request, the Administrator docketed investigation number 2017IN00320 into Respondent's alleged conduct.

Answer: Respondent does not have enough information to respond to these allegations.

27. After docketing investigation number 2017IN00320, counsel for the Administrator sent Respondent letters requesting that Respondent submit a response to LC's allegations. The letters were sent to the address which Respondent had previously provided as part of the annual registration process (on Hoyne Avenue in Chicago), but as of April 12, 2018 Respondent had not responded to the Administrator regarding LC's allegations.

Answer: Respondent does not have sufficient knowledge to respond to these allegations.

28. April 12, 2018, the Administrator issued a subpoena that required Respondent's appearance for a sworn statement and the production of documents at the ARDC's Chicago

office on May 15, 2018. On May 1, 2018, Respondent was personally served with the Administrator's subpoena.

Answer: Respondent does not have sufficient knowledge to respond to these allegations.

29. Respondent did not appear for his sworn statement on May 15, 2018, nor did he contact counsel for the Administrator to request that his appearance be rescheduled. Respondent's appearance has never been rescheduled for a date after May 15, 2018, nor has it been waived or excused.

Answer: Respondent does not have sufficient knowledge to respond to these allegations.

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

- a) failing to respond to a lawful demand for information from a disciplinary authority, by failing to appear on May 15, 2018, or thereafter, in compliance with the Administrator's subpoena requiring Respondent's appearance for a sworn statement with which he had been personally served, in violation of Rule 8.1(b) of the Illinois Rules of Professional Conduct (2010).

Answer: Respondent does not have sufficient knowledge to respond to these allegations.

COUNT III
(*Reckless Driving-Supervision*)

31. On October 22, 2015, Respondent was driving a red Lexus vehicle southbound on the 7400 block of South Wabash Avenue in Chicago when he was stopped by Officer William Giger. Based on the officer's observations and interactions with Respondent, Officer Giger arrested and charged Respondent with four counts of violations of the Illinois Compiled Statutes for: driving while intoxicated, pursuant to 625 ILCS 5.0/11-501-A-2; failing to obey a stop sign, pursuant to 625 ILCS 5.0/11-904-B; illegally possessing and transporting of liquor from a

passenger vehicle, pursuant to 625 ILCS 5.0/11-502-B; and driving with a suspended Illinois drivers' license, pursuant to 625 ILCS 5.0/6-101. The Clerk of the Circuit Court of Cook County docketed the charges against Respondent under ticket number TH450470.

Answer: Respondent admits he was arrested.

32. On May 23, 2017, Respondent pled guilty before the Honorable Marita Sullivan to a reduced charge of reckless driving, a Class A misdemeanor offense, in violation of 625 ILCS 5.0/11-503-A-2. As a result, Judge Sullivan sentenced Respondent to one year of supervision, terms of which included not violating the criminal statute of any jurisdiction, participating in ten days of public service with the sheriff work alternative program (SWAP), and paying \$500 in fines.

Answer: Respondent admits these allegations.

33. As a result of the conduct described above, Respondent has engaged in the following misconduct:

- a. committing criminal acts that reflect adversely on the lawyer's honesty, trustworthiness or fitness as a lawyer in other respects, by conduct including committing the criminal offense of reckless driving in violation of 625 ILCS 5.0/11-503-A-2, in violation of Rule 8.4(b) of the Illinois Rules of Professional Conduct (2010).

Answer: Respondent denies these allegations.

COUNT IV

(Felony Conviction for Possession of a Fraudulent Driver's License)

34. On December 15, 2017, at 3:300 a.m., Respondent was the driver of a silver Mercedes vehicle that he double-parked near 7401 South Vincennes and 150 West 75th Street in

Chicago. A Chicago Police Officer with initials KS arrived at the scene and requested that respondent provides his driver's license and proof of insurance. Respondent gave the officer his Illinois firearm owner's identification bearing the name William E. Koffie, Jr. Respondent then handed KS. A fake Illinois driver's license bearing the name of Willie Evans that included a picture of Respondent.

Response: Respondent admits in part and denies that the identification he provided was fake.

35. During the traffic stop, Respondent stated he was test driving the silver Mercedes. KS asked Respondent about the name difference on Respondent's Illinois attorney registration card and the Illinois driver's license. Respondent initially stated he had one name for the system and another was part of a family name. subsequently, Respondent stated his actual name was William Evans.

Response: Respondent denies in part and admits that William Evans is his name.

36. on January 9, 2018, a grand jury indicted Respondent with one felony count of knowingly possessing a fraudulent driver's license in violation of 625 ILCS 5/6-301.1(B)(1). The Clerk of the Circuit Court of Cook County docketed the charge against him as case number 2018CR0065101, titled People of the State of Illinois v. William Koffie.

Response: Respondent admits this allegation.

37. On November 14, 2024, case 2018CR0065101 proceeded to trial by jury. On November 15, 2024, the jury returned a verdict of guilty. On December 17, 2024, the judge sentenced Respondent to one year in the Illinois Department of corrections.

Response: Respondent admits.

38. As a result of the conduct described above, Respondent has engaged in the following misconduct:

- a. committing a criminal act that reflects adversely on the lawyer's honesty, trustworthiness or fitness as a lawyer in other respects, by conduct including Respondent's felony conviction for knowingly possession of fraudulent driver's license in violation of 625 ILCS 5.0/6-301.2(B)(1), in the violation of Rule 8.4(b) of the Illinois Rules of Professional Conduct (2010).

Response: Respondent denies this allegation.

COUNT V

(Identity Fraud and Criminal Conviction for Criminal Trespass)

39. On or about January 3, 2018, an individual with the initials KH reported to the Naperville Police Department that he believed someone had used his personal information to apply for credit accounts at BMO Harris Bank. KH reported to the police that he had received a BMO Harris Bank Business Platinum Rewards credit card in the mail with his name and the name of his business. He reported that he had not authorized anyone to use his information or information pertaining to his business to apply for the credit card.

Response: Respondent does not have sufficient information to admit or deny this allegation.

40. A bank manager from BMO Harris investigated the application allegedly made by KH and his business. The manager determined that the application had been made at the BMO

Harris Bank branch located at 3601 N. Halsted in Chicago. BMO Harris provided the Naperville Police Department with the original credit application. The Naperville Police Department then provided the fingerprint evidence from the credit card application to R.E. Walsh & Associates, Inc. (“REWA”) to evaluate. REWA determined that of the twelve fingerprints on the application, six of them identified to a bank employee and five of them to Respondent. REWA prepared a report dated January 4, 2019 with the results of its examination and provided that to the Naperville Police Department.

Response: Respondent does not have sufficient information to admit or deny this allegation.

41. On June 12, 2018, Respondent was charged, by a felony complaint, with one count of Identity Theft – Exceeding \$300 but not Exceeding \$2,000, in violation of 720 ILCS 5/16-30(a)(1). The complaint alleged that Respondent “knowingly used the personal identifying information of [KH] to fraudulently obtain credit being a business credit card account at BMO Harris Bank, the value of which exceed[ed] \$300.00 but did not exceed \$2,000.00.” *State v. Koffie*, No. 2020CF00786, Circuit Court of the Eighteenth Judicial District, County of DuPage.

Response: Respondent admits.

42. On October 8, 2020, a grand jury indicted Respondent for an additional count of knowingly using personal identifying information of another person to fraudulently obtain credit exceeding \$10,000 but not in excess of \$100,000, in violation of 720 ILCS 5/16-30(a)(1) and 720 ILCS 5/16-30(e)(1)(A)(iv).

Response: Respondent admits.

43. On May 18, 2023, Respondent pled guilty to identity theft, which was count two of the criminal complaint. Pursuant to the plea agreement, the Court granted the State's motion to dismiss count one of the complaints.

Response: Respondent pled guilty and later withdrew that guilty plea.

44. On December 5, 2024, the court granted the State's motion to amend count two of the complaint from identity theft to misdemeanor criminal trespass to a building. The court vacated the plea of guilty entered on May 18, 2023. On December 5, 2024, Respondent pled guilty to the amended charge of criminal trespass to a building, a class B misdemeanor, in violation of 720 ILCS 5/21-3(a)(1). The court sentenced Respondent to two years of conditional discharge. The court ordered Respondent to pay \$21,207.18 in restitution to BMO Harris Bank.

Response: Respondent admits this allegation.

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

- a. committing criminal acts that reflects adversely on his honesty, trustworthiness or fitness as a lawyer in other respects, by committing the offenses of criminal trespass to a building and fraudulently using the identifying information of another person to obtain a credit card, in violation of Rule 8.4(b) of the Illinois Rules of Professional Conduct (2010).

Response: Respondent denies this allegation.

WHEREFORE, Mr. Koffie respectfully requests that the Chair dismisses the complaint against him, and/or enter a just and equitable order in his favor for the following reasons:

1. During the period when LC's case was pending, Respondent communicated to her that he was travelling outside of the country and that he was transferring the case to Attorney David Kadzai. Clark knew and consented to the case being handled by Attorney Kadzai while he was away. In addition, he paid Clark \$1000.00 when he realized the case did not go the way he had wanted;
2. Respondent moved from 6119 N. Hoyne Ave and had failed to update his address with the ARDC. That was why he was not responding the motions and notices of the motions. He was not willfully refusing to cooperate with the ARDC;
3. Respondent was never convicted of Reckless Driving. Instead, he was sentenced to a court supervision. Supreme Court Rule 761(a) only require Respondent to report a conviction. Court supervision is not a conviction and respondent's supervision was terminated successfully. Therefore, he was not required to report that to the ARDC. Besides, reckless driving is not a reflection of a lawyer's honesty, trustworthiness or fitness as a lawyer.
4. The identification card with the name "William Evans" was not fake as William Evans is Respondent's first and middle names. And possession of a card with his first and middle name does not reflect adversely on his honesty, trustworthiness or fitness as a lawyer. Moreover, a notice of appeal has already been filed in that matter; and
5. Regarding the identity fraud and criminal conviction for criminal trespass allegation, Mr. Koffie was not convicted for identity fraud. His guilty plea was withdrawn because he did not believe it reflected what happened. He got KH's information legally through a shelf corporation he purchased. That was why the circuit court allowed him to withdraw his guilty plea.

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