

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

In the Matter of:

DAVID WILLIAM LAWLER,

Attorney-Respondent,

No. 6303793.

Comm. No. 2024PR00077

ANSWER

NOW COMES Respondent, David W. Lawler, by and through his attorney, James A. Doppke, Jr., Robinson, Stewart, Montgomery & Doppke, LLC, admitting the accuracy of his date of licensure in Illinois as alleged in the prefatory paragraph of the Administrator's Complaint but denying all other allegations of that paragraph, and for his answer to the Administrator's Complaint in this matter, states as follows:

ALLEGATIONS COMMON TO ALL COUNTS

1. In December 2021, Respondent formed a real estate holding company, Lawler and Maze, LLC ("holding company") with a friend, Justin Maze ("Maze"). At the time, Maze served as the Circuit Clerk of Williamson County.

ANSWER: Respondent admits the allegations contained in paragraph 1, except that he states that the LLC was named Lawler and Maze Properties, LLC and not Lawler and Maze, LLC.

2. On June 12, 2024, Respondent entered into a pre-trial diversion agreement with the United States Department of Justice, in which Respondent "agree[d] that [he]

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knowingly aided and abetted the crimes of making one or more false entries in the books and records of SouthernTrust Bank in violation of Title 18, United States Code, Section 1005.” Prosecution of Respondent was deferred for 18 months while he completed conditions of the agreement, including that he continue to make timely payments on any outstanding loans.

ANSWER: Respondent admits the allegations contained in paragraph 2, except any allegations to the effect that he knew that any entries in the books and records of SouthernTrust Bank were false when made, which allegations Respondent denies.

COUNT I

*(Allegedly Knowingly Signing False Loan Documents –
August 2022 transaction with Brandon Zanotti)*

3. Prior to March 26, 2022, Respondent and Maze agreed to purchase, through their holding company, seven commercial real estate properties owned by Results Home Buyers 2, LLC, of which Brandon Zanotti (“Zanotti”), an Illinois-licensed attorney, was a partner.

ANSWER: Respondent admits the allegations contained in paragraph 3. Further answering, Respondent states that he functioned as a silent partner in Lawler and Maze Properties, LLC, and as such he authorized Maze to negotiate, and Maze did negotiate, on behalf of Lawler and Maze Properties, LLC in the transaction.

4. Prior to March 26, 2022, Respondent, Maze, and Zanotti agreed to finance the purchase of the commercial properties through SouthernTrust Bank (“SouthernTrust”), a community bank with locations in Marion, Vienna, and Goreville. Respondent, Maze,

and Zanotti worked with Steven Cook (“Cook”), president of SouthernTrust, to finance the loan.

ANSWER: Respondent admits the allegations contained in paragraph 4, except any allegations to the effect that he met with Cook, Maze, and Zanotti in person in connection with the commercial properties, or that he attended any meetings at which seller financing was discussed, which allegations Respondent denies.

5. Prior to March 26, 2022, Respondent, Maze, Zanotti, and Cook agreed to complete documents stating that Zanotti, through Results, would sell Respondent and Maze’s holding company seven properties for a purchase price of \$545,152 and a cash down payment of \$109,030.

ANSWER: Respondent denies the allegations contained in paragraph 5.

6. Respondent, Maze, Zanotti, and Cook agreed that, despite drafting documents stating the purchase terms as described in paragraph five, above, the actual purchase price would be \$436,122 and no down payment would be paid.

ANSWER: Respondent denies the allegations contained in paragraph 6.

7. On August 12, 2022, Respondent signed commercial loan documents stating that the purchase agreement for the commercial properties was \$545,152, including a cash down payment of \$109,030.

ANSWER: Respondent admits the allegations contained in paragraph 7. Further answering, Respondent did not review the documents in detail at the time of execution, and he did not notice their references to a sale price of \$545,152 or a cash down payment of \$109,030. Further answering, Respondent was not aware of either the Title Company

or the bank making any inquiries concerning, or demanding, the cash down payment or any documents relating to it.

8. Respondent's representation, described in paragraph seven, above, that he and Maze purchased the commercial properties for \$545,152, including a cash down payment of \$109,030, was false, because he knew that the actual purchase price for the properties was \$436,030 and did not include a cash down payment.

ANSWER: Respondent denies the allegations contained in paragraph 8, including and especially any and all allegations to the effect that Respondent made any knowing or intentional misrepresentations concerning the transaction referred to in paragraph 8. Further answering, Respondent states that he believed that the purchase price for the properties was \$436,122, and that he did not understand the agreement to require him and Maze to pay Zanotti \$545,152, or to require him to pay, or participate in paying, a down payment of \$109,030.

9. Respondent knew at the time he signed the commercial loan documents described in paragraph seven, above, that the entries were false.

ANSWER: Respondent denies the allegations contained in paragraph 9.

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

- a. knowingly assisting or inducing another to do so, or do so through the acts of another, by conduct including assisting Zanotti in obtaining a commercial real estate loan from SouthernTrust when the loan was based on false loan documents, in violation of Rule 8.4(a) of the Rules of Professional Conduct (2010);

- b. committing a criminal act that reflects adversely on the lawyer's honesty, trustworthiness, or fitness as a lawyer in other respects, by conduct including knowingly aiding Zanotti and Cook in creating false bank documents and thereby violating Sections 2 and 1005 of Title 18 of the United States Code, in violation of Rule 8.4(b) of the Illinois Rules of Professional Conduct (2010); and
- c. engaging in conduct involving dishonesty, fraud, deceit or misrepresentation, by conduct including knowingly making the false statement described in paragraph seven, above, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

ANSWER: The allegations contained in paragraph 10 constitute legal conclusions, and therefore, no answer is required. To the extent that an answer is deemed required, Respondent denies the allegations contained in paragraph 10.

COUNT II

*(Allegedly Knowingly Signing False Loan Documents –
August 2022 transaction with Steven Fowler)*

11. The Administrator realleges and incorporates paragraphs one through nine, above.

ANSWER: Respondent restates his answers to paragraphs one through nine, above, as if fully set forth herein.

12. Prior to August 12, 2022, Respondent and Maze agreed to purchase four commercial properties from Steven Fowler ("Fowler").

ANSWER: Respondent admits the allegations contained in paragraph 12.

13. Prior to August 12, 2022, Respondent, Maze, Fowler, and Cook agreed to complete loan documents stating that Respondent and Maze, through their holding

company, would purchase four properties from Fowler for \$413,000, including a cash down payment of \$82,600.

ANSWER: Respondent denies the allegations contained in paragraph 13.

14. Prior to August 12, 2022, Respondent, Maze, Fowler, and Cook agreed that despite drafting documents stating the purchase terms as described in paragraph 13, above, the actual purchase price would be \$330,400 and no down payment would be paid.

ANSWER: Respondent denies the allegations contained in paragraph 14.

15. On August 12, 2022, Respondent, Maze, and Fowler, with the assistance of Cook, signed loan documents stating that Respondent and Maze, through their holding company, would purchase four properties from Fowler for \$413,000, including a cash down payment of \$82,600.

ANSWER: Respondent admits the allegations contained in paragraph 15. Respondent did not review the documents at the time of execution, and he did not notice their references to a sale price of \$413,000 or a cash down payment of \$82,600. Further answering, Respondent was not aware of either the Title Company or the bank making any inquiries concerning, or demanding, the cash down payment any documents relating to it.

16. Respondent's representation in the loan documents described in paragraph 15, above, that he and Maze would pay Fowler \$413,000, including a cash down payment of \$82,600, was false, because he and Maze had not provided a down payment of \$82,600.

ANSWER: Respondent denies the allegations contained in paragraph 16, including and especially any and all allegations to the effect that Respondent made any

knowing or intentional misrepresentations concerning the transaction referred to in paragraph 16. Further answering, Respondent states that he believed that the purchase price for the properties was \$330,400, and that he did not understand the agreement to require that he and Maze would pay Fowler \$413,000, or to require him to pay, or participate in paying, a down payment of \$82,600.

17. Respondent knew at the time that he signed the loan documents described in paragraph 15, above, that they were false.

ANSWER: Respondent denies the allegations contained in paragraph 17.

18. By reason 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 knowingly aiding Zanotti and Cook in creating false bank documents and thereby violating Sections 2 and 1005 of Title 18 of the United States Code, in violation of Rule 8.4(b) of the Illinois Rules of Professional Conduct (2010); and
- b. engaging in conduct involving dishonesty, fraud, deceit or misrepresentation, by conduct including knowingly making the false statement described in paragraph 15, above, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

ANSWER: The allegations contained in paragraph 18 constitute legal conclusions, and therefore, no answer is required. To the extent that an answer is deemed required, Respondent denies the allegations contained in paragraph 18.

COUNT III
*(Allegedly Knowingly Signing False Loan Documents –
November 2022 transaction with Nathan Pierce)*

19. The Administrator realleges and incorporates paragraphs 11 through 17, above.

ANSWER: Respondent restates his answers to paragraphs 11 through 17, above, as if fully set forth herein.

20. Prior to November 17, 2022, Respondent and Maze agreed to a purchase a residential property in Marion from Nathan Pierce (“Pierce”) for \$107,500.

ANSWER: Respondent admits the allegations contained in paragraph 20. Further answering, Respondent states that the purchase price was later reduced to \$85,745.96.

21. On November 17, 2022, Respondent, Maze, and Pierce, with the assistance of Cook, signed loan documents stating that the purchase price of the residential property was \$107,500, that Respondent and Maze paid Pierce \$21,754.04, and that SouthernTrust financed \$86,000.

ANSWER: Respondent admits the allegations contained in paragraph 21. Further answering, Respondent states that at the time of execution, he believed that the \$21,754.04 referred to in the documents had been paid to Pierce, or that there were seller financing terms that were negotiated that would allow Lawler and Maze Properties, LLC to pay those funds to Pierce over time.

22. Respondent's representation in the loan documents, described in paragraph 21 above, that he and Maze provided \$21,754.04 was false, because he knew that he and Maze had not paid Pierce \$21,754.04.

ANSWER: Respondent denies the allegations contained in paragraph 22. Further answering, Respondent states that at the time the documents were executed, he did not know whether Maze had paid Pierce, or whether Maze had negotiated with Pierce or Fowler any agreement by which the \$21,754.04 would be payable over time.

23. Respondent knew at the time he signed the commercial loan documents described in paragraph 21, above, that the statements were false.

ANSWER: Respondent denies the allegations contained in paragraph 23.

24. By reason 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 knowingly aiding Zanotti and Cook in creating false bank documents and thereby violating Sections 2 and 1005 of Title 18 of the United States Code, in violation of Rule 8.4(b) of the Illinois Rules of Professional Conduct (2010); and
- b. engaging in conduct involving dishonesty, fraud, deceit or misrepresentation, by conduct including knowingly making the false statement described in paragraphs 7 and 8, above,⁶ in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

ANSWER: The allegations contained in paragraph 24 constitute legal conclusions, and therefore, no answer is required. To the extent that an answer is deemed required, Respondent denies the allegations contained in paragraph 24.

RESPONDENT'S DISCLOSURE PURSUANT TO COMMISSION RULE 231

1. Respondent was admitted to practice law in the State of Illinois on November 4, 2010.
2. Respondent was admitted to practice law in the United States District Court for the Southern District of Illinois on September 4, 2012.
3. Respondent has not been issued any professional licenses other than his license to practice law.

Respectfully submitted,

/s/ James A. Doppke, Jr.

BY: James A. Doppke, Jr.

Counsel for Respondent

James A. Doppke, Jr.
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NOTICE OF FILING

TO: Rachel C. Miller
rmiller@iardc.org

ARDC eService
ARDCeService@iardc.org

PLEASE TAKE NOTICE that on March 11, 2025, I filed the attached Answer with the Clerk of the Attorney Registration and Disciplinary Commission, copies of which are hereby served upon you.

/s/ James A. Doppke, Jr.

BY: James A. Doppke, Jr.
Counsel for Respondent

PROOF OF SERVICE

The undersigned attorney hereby certifies that he served the above Notice of Filing, and the attached Answer, by emailing them to the email addresses listed above on March 11, 2025, before 11:59 p.m.

/s/ James A. Doppke, Jr.

James A. Doppke, Jr.

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