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

In the Matter of:)	
AARON TRENT KORSON,)	Commission No. 2024BD00056
Attorney-Respondent,)	Commission No. 2024PR00056
No. 6331873.))	

ANSWER TO FIRST AMENDED COMPLAINT

NOW COMES, AARON KORSON, pro se, and in Response to Administrator's First Amended Complaint states as follows:

COUNT I

- 1. Admit and Deny in part as Avvo is a website which allows reviews of attorneys and deny in part as not only can clients leave reviews of attorneys, but people who have consulted with attorneys, and anyone from the public can leave reviews of attorneys on the website.
- 2. Deny as Avvo has guidelines on their website for individuals who have hired attorneys or consult with attorneys but is not responsible for reviews as outlined in their terms of service and makes no guarantee as to the reviews, but is in fact a public forum.
- 3. Admit and Deny in part as Findlaw is a website which allows reviews of attorneys and deny in part as not only can clients leave reviews of attorneys, but people who have consulted with attorneys, and anyone from the public can leave reviews of attorneys on the website.
- 4. Deny as Findlaw states that an individual can leave their opinion of working with an attorney.
- 5. Respondent Denies.
- 6. Respondent Denies
- 7. Respondent Denies
- 8. Respondent Denies

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- 9. Respondent Denies
- 10. Respondent Denies
- 11. Respondent Denies
- 12. Respondent Denies
- 13. Respondent Denies
- 14. Respondent Denies

COUNT II

- 15. Admit in part and deny in part as Respondent agreed to assist in the divorce and only advised in the eviction based upon recollection.
- 16. Respondent lacks information to confirm or deny as Samoane Williams and Respondent agreed for Respondent to be removed from the proceeding due to a personal and professional relationship stemming from Samoane's position of authority in a referral based organization and Respondent lacks personal knowledge.
- 17. Respondent Admits
- 18. Respondent lacks information to confirm or deny.
- 19. Respondent cannot admit or deny only as to what was stated and does not recall.

 Respondent admits that the opposing party failed to appear.
- 20. Respondent admits.
- 21. Respondent admits.
- 22. Respondent admits.
- 23. Respondent cannot admit or deny as he was unaware of the filings.
- 24. Respondent cannot admit or deny as he does not have personal knowledge.
- 25. Respondent admits.
- 26. Admit
- 27. Respondent denies.
- 28. Respondent denies.
- 29. Respondent Admits.
- 30. Respondent Admits
- 31. Respondent Admits.
- 32. Respondent denies.
- 33. Respondent Admits.

- 34. Respondent Admits.
- 35. Respondent Admits
- 36. Respondent Admits
- 37. Respondent Denies
- 38. Respondent Denies
- 39. Respondent lacks personal knowledge and cannot admit or deny.
- 40. Respondent Denies
- 41. Respondent Denies
- 42. Respondent Denies
- 43. Respondent Admits
- 44. Respondent Admits
- 45. Respondent Admits
- 46. Respondent Denies
- 47. Respondent Admits
- 48. Respondent Denies
- 49. Respondent Admits
- 50. Respondent Denies
- 51. Respondent Admits
- 52. Respondent Admits and Denies in part.
- 53. Respondent Admits
- 54. Respondent Admits
- 55. Respondent Admits
- 56. Respondent Admits that an order was entered, but denies as the order was not accurate in what was stated by the court. In addition, Mark Almanza purposefully kept Respondent off of the proposed order although he was ordered to share the order with counsel before submitting it.
- 57. Respondent Denies
- 58. Respondent Denies
- 59. Respondent Denies
- 60. Respondent Denies
- 61. Respondent Denies

- 62. Respondent Denies
- 63. Respondent Denies
- 64. Respondent Denies
- 65. Respondent Denies
- 66. Respondent Denies
- 67. Respondent Denies
- 68. Repondent Denies
- 69. Respondent Denies
- 70. Respondent Denies
- 71. Respondent Denies
- 72. Respondent Denies

COUNT III

- 73. Respondent Admits in part and denies in part as he was the owner, but the time is believed to be incorrect.
- 74. Respondent Admits
- 75. Respondent lacks sufficient knowledge to admit or deny.
- 76. Respondent lacks sufficient knowledge to admit or deny.
- 77. Respondent lacks sufficient knowledge to admit or deny.
- 78. Respondent lacks sufficient knowledge to admit or deny.
- 79. Respondent lacks sufficient knowledge to admit or deny.
- 80. Respondent lacks sufficient knowledge to admit or deny.
- 81. Respondent denies.
- 82. Respondent denies in part as the excerpt is taken out of context from the email and is a mischaracterization of the events.
- 83. Respondent Admits.
- 84. Respondent Denies
- 85. Respondent Admits.

- 86. Respondent admits and denies in part, as he confused a similar guardianship case to that of Ms. Melonson and took on matters that his associate left undocumented and unaccounted for since she left without notice.
- 87. Respondent admits and denies in part that he confused a similar guardianship case to that of Ms. Melonson and did not intend to give a false statement. Respondent took on matters that his associate left undocumented and unaccounted for since she left without notice.
- 88. Respondent Denies.
- 89. Respondent Admits
- 90. Respondent admits and denies in part that he confused a similar guardianship case to that of Ms. Melonson and did not intend to give a false statement. Respondent took on matters that his associate left undocumented and unaccounted for since she left without notice.
- 91. Respondent Denies because he confused a similar guardianship case to that of Ms.

 Melonson and did not intend to give a false statement. Respondent took on matters that his associate left undocumented and unaccounted for since she left without notice.
- 92. Respondent Denies as he does not believe he was the individual who filed the motion to withdraw.
- 93. Respondent Admits because Ms. Melonson stated that she no longer wanted to pursue the guardianship case and that the matter should remain off call. Respondent addressed the court at a time when a similar matter in which he had been confused with Ms. Melonson was up on status before Judge Miller.
- 94. Respondent Denies as Ms. Melonson stated she no longer wanted to pursue the action when speaking with Respondent.
- 95. Respondent Denies as the case was assigned to an attorney who dishonestly stated that she had been appearing on the matter, the Respondent Denies as he kept Ms. Melonson informed of the circumstances regarding the motion to vacate and the withdrawal, Respondent further denies as he took on matters that his associate did not leave information regarding and confused one matter with that of Ms. Melonson's guardianship case.

COUNT IV

- 97. Respondent Admits.
- 98. Respondent Admits and denies in part as Respondent's associate did appear, but did not state the telephonic status hearing to Respondent or docket the date in the calendar.
- 99. Respondent Admits.
- 100. Respondent Admits and Denies in part since Lyndera spoke with staff and a response via email was no longer necessary.
- 101. Respondent Admits and Denies in part since Respondent believes that Lyndera spoke with staff and a response via email was no longer necessary.
- 102. Respondent Denies as he did not receive a phone call for the hearing at 4:00 p.m. or a voicemail.
- 103. Respondent Admits and Denies in part since Respondent believes that Lyndera spoke with staff and a response via email was no longer necessary.
- 104. Respondent Admits and Denies in part since Respondent believes that Lyndera spoke with staff and numerous emails and other communication exchanges occurred during this time frame.
- 105. Respondent Admits
- 106. Respondent Admits
- 107. Respondent Denies.
- 108. Respondent Denies
- 109. Respondent Admits and Denies in part since Respondent believes that Lyndera spoke with staff and numerous emails and other communication exchanges occurred during this time frame.
- 110. Respondent Admits and Denies in part since Respondent believes that Lyndera spoke with staff and numerous emails and other communication exchanges occurred during this time frame.
- 111. Respondent Admits and Denies in part since Respondent believes that Lyndera spoke with staff and numerous emails and other communication exchanges occurred during this time frame.
- 112. Respondent Admits and Denies in part since Respondent believes that Lyndera spoke with staff and numerous emails and other communication exchanges occurred during this time frame.

- 113. Respondent Denies as a matter was filed with the Cook County Circuit Court by his law clerk. Respondent believed that the matter was being handled and a set up of the hearing date was occurring.
 114. Respondent Denies as a matter was in fact filed by his law clerk prior.
 115. Respondent admits.
- 116. Respondent admits.
- 117. Respondent admits.
- 118. Respondent admits.
- 119. Respondent admits.
- 120. Respondent admits.
- 121. Respondent admits.
- 122. Respondent admits.
- 123. Respondent denies.
- 124. Respondent denies.
- Respondent lacks personal knowledge as he did not docket the matter.
- 126. Respondent admits.
- 127. Respondent admits.
- 128. Respondent admits.
- 129. Respondent denies.
- Respondent denies as he did attempt to send out a refund to Lyndera Williams
- 131. Respondent denies.

COUNT V

- 132. Respondent admits.
- 133. Respondent lacks personal knowledge to admit or deny.
- 134. Respondent lacks personal knowledge to admit or deny.
- 135. Respondent lacks personal knowledge to admit or deny.
- 136. Respondent lacks personal knowledge to admit or deny.
- 137. Respondent admits.
- 138. Respondent admits.
- 139. Respondent admits.

- 140. Respondent admits.
- 141. Respondent admits.
- Respondent admits as he attempted to reach out to Ms. Murphy several times to file the appropriate response.
- 143. Respondent denies as it was explained to Ms. Murphy that he couldn't file a response without Ms. Murphy's assistance.
- 144. Respondent lacks personal knowledge to admit or deny.
- 145. Respondent denies.
- 146. Respondent denies as he did appear, but opposing counsel appeared shortly after and they submitted the order to the court without counsel being on the court order. It is well documented that opposing counsel has not sent notice to Respondent or his law firm on numerous occasions and court orders were not included to Respondent or his law firm on numerous occasions. Respondent did appear on the matter before the opposing party's counsel.
- 147. Respondent lacks personal knowledge as he did not see a final report submitted or noticed to him or his firm.
- 148. Respondent admits since opposing counsel who appeared shortly after

 Respondent received a different date and drafted the order, but was unaware of the date.
- 149. Respondent lacks personal knowledge as no notice was given to Respondent or his firm.
- 150. Respondent denies.

COUNT VI

- 151. Respondent Admits.
- 152. Respondent Denies as there was missing documentation.
- 153. Respondent Admits.
- 154. Respondent Admits.
- 155. Respondent Admits as we were missing the necessary documentation.
- 156. Respondent Admits in part and denies in part as there was a significant language barrier between the parties.

157. Respondent Admits in part and denies in part as there was a significant language barrier between the parties. 158. Respondent Denies 159. Respondent Denies 160. Respondent Denies as he did not receive a refund request to Respondent's knowledge and Respondent lacks personal knowledge. 161. Respondent Denies **COUNT VII** 162. Respondent Admits. 163. Respondent Admits. 164. Respondent Admits. 165. Respondent Admits. 166. Respondent Denies 167. Respondent Admits 168. **Respondent Admits** 169. Respondent Denies 170. Respondent Denies 171. Respondent Denies 172. Respondent Denies 173. Respondent Denies 174. Respondent Denies 175. Respondent lacks personal knowledge to admit or deny. 176. Respondent Admits. 177. Respondent Denies 178. Respondent Denies 179. Respondent Admits 180. Respondent Admits 181. **Respondent Admits** 182. Respondent Admits 183. Respondent Admits 184. Respondent Admits

- 185. Respondent Admits
- 186. Respondent Admits
- 187. Respondent Admits
- 188. Respondent Admits
- 189. Respondent Admits
- 190. Respondent Admits as he had spoken with Texas counsel repeatedly and believed that the process needed to be different for registering the foreign judgment based upon the requirements of Texas and the fact that Texas still had jurisdiction in the matter.
- 191. Respondent Denies as he did not receive an email to that effect. Respondent also received a request from Chazaro stating that she would like to move forward with representation around what is believed to be that same timeframe.
- 192. Respondent lacks sufficient knowledge to admit or deny.
- 193. Respondent Denies.

COUNT VIII

- 194. Respondent Admits
- 195. Respondent Admits
- 196. Respondent Admits
- 197. Respondent Admits
- 198. Respondent Denies as Shicole Ashford was a low income client who could not afford to waste money on a special process server if she did not have the correct address. The landlord moved out of state and none of the information provided by Shicole Ashford matched what was found online. Shicole Ashford could only pay the filing fee and not afford to pay the usual fees. To be considerate and sensitive to the economic issues Ms. Ashford faced financially, Respondent attempted to ensure that she did not waste money that she could not afford to pay for.
- 199. Respondent Denies.
- 200. Respondent Denies as he did not receive an email to his knowledge.
- 201. Respondent admits.

- 202. Respondent Admits because the landlord information was not corroborated for a filing to occur without potential waste to the client. All funds paid were also refunded to Shicole Ashford.
- 203. Respondent Denies as he never stated he filed a lawsuit, but was attempting to find verified information for future service to avoid waste of finances for the client.

COUNT IX

- 204. Respondent Denies.
- 205. Respondent Denies in part as Ariel Sanders Shannon emailed Respondent accusing him of losing his license to practice law and fraud as a result of the pending ARDC complaint that was answered.
- 206. Respondent Admits. Sanders Shannon filed an ARDC complaint before waiting for the refund alleging fraud and citing the original ARDC complaint.
- 207. Respondent denies as he sent a check to Sanders Shannon's new counsel. Over a month passed before the check had been attempted to be cashed and a stop payment was put on the check believing that it was lost.
- 208. Respondent Denies as attempts for a refund were made.

COUNT X

- 209. Respondent Admits.
- 210. Respondent Admits in part and denies in part as before receiving the text message, Respondent found out about the requested refund through his bank. The bank shut down all Zelle processing at that time making it impossible for Respondent to process payments as was usually done through Zelle. Respondent additionally could not send funds out to Alicia Ramos. Alicia Ramos cited the prior ARDC complaint as her reasoning stating that the payment was fraud and that she never authorized for the funds to be taken from her account. The statement that the payment was fraud caused irreparable harm to Respondent's business and thousands of additional processing fees and the inability to send money to Alicia Ramos.

- 211. Respondent Denies as Respondent believes that the refund request and fraud statement still is pending with the banks involved and that payment may have been held for Alicia Ramos. To date, Respondent lacks knowledge as to whether Ms. Raoms was compensated although she has caused thousands of dollars in processing fees to unnecessarily occur as a result of the false statement that she did not authorize payment.
- 212. Respondent Denies

COUNT XI

- 213. Respondent lacks personal knowledge as he never filed an emergency order of protection in Will County.
- 214. Respondent lacks personal knowledge as he was never involved in an order of protection matter whereby a lawyer filed an appearance.
- 215. Respondent can neither confirm or deny as he lacks personal knowledge.
- 216. Respondent denies.
- 217. Respondent denies as he believes the date is incorrect and Respondent did not believe that C.J.'s lawyer was participating in the matter in Cook County and only reached out to that attorney based upon M.M.'s belief that she may have been the attorney that showed up in another matter that M.M. was being represented in and called to ask if C.J. was represented.
- 218. Respondent lacks sufficient knowledge to admit or deny.
- 219. Respondent lacks sufficient knowledge to admit or deny.
- 220. Respondent admits.
- 221. Respondent denies.
- 222. Respondent denies.
- 223. Respondent denies.

COUNT XII

224. Respondent admits in part and denies in part as the actual terms regarding the DCFS issues were not fully explained or capable fo being deciphered.

- 225. Respondent admits.
- 226. Respondent admits.
- 227. Respondent admits, but a case number could not be supplied at the time since correspondence took place verbally regarding the matter and the status of the safety plan and there was not prior documentation showing that any party was indicated.
- 228. Respondent does not believe that he received an email to that effect and cannot admit or deny at this time.
- 229. Respondent denies as Kevin Quiroz received initial drafts.
- 230. Respondent admits and denies in part as Respondent has earned the fees associated.
- 231. Respondent denies.

COUNT XIII

- 232. Respondent Admits.
- 233. Respondent Denies
- 234. Respondent Denies as he was not included on an email.
- 235. Respondent Denies as he did not receive an email to this effect.
- 236. Respondent Denies
- 237. Respondent Denies as when speaking with Elizabeth Gonzalez she pointedly cited the pending ARDC complaint as the reason in which she would like to terminate services. Respondent agreed to terminating services. Respondent was unable to send the payment out with regard to Zelle in the same form and additionally requested information on how to send payment to Elizabeth Gonzalez which she has not responded to as of today's date.
- 238. Respondent lacks personal knowledge to admit or deny.

COUNT XIV

- 239. Respondent admits.
- 240. Respondent did not receive a text and cannot admit or deny that a request was made to Respondent's assistant.

- 241. Respondent has no issue in returning the funds and only originally didn't return the funds because of confusion with a client that had a similar name.
- 242. Respondent denies as there has not been intent to deprive Mr. Anderson of an unearned fee. At this time, funds are being held by PayPal which are on hold and unable to be reached which hold Mr. Anderson's refund.

WHEREFORE, Respondent, AARON KORSON, respectfully requests that this matter be dismissed and that a finding that an unethical act has not occurred be made.

Respectfully submitted,

By: /s/Aaron T. Korson, Esq.

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VERIFICATION

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 she verily believes the same to be true.

AARON T. KORSON, ESQ.