

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

In the Matter of:

KALI RENEE PRAY,
Attorney-Respondent,
No. 6346247.

Commission No. 2026PR00045

COMPLAINT

Lea S. Gutierrez, Administrator of the Attorney Registration and Disciplinary Commission, by her attorney, Tammy L. Evans, pursuant to Supreme Court Rule 753(b) and 761(c), complains of Respondent, Kali Renee Pray, who was licensed to practice law in Illinois on November 9, 2023, and alleges that Respondent has engaged in the following conduct which subjects Respondent to discipline pursuant to Supreme Court Rule 770:

COUNT I

(Dishonesty and Conviction for Aggravated Unlawful Possession of a Weapon Without a Valid FOID Card)

1. At all times alleged in this complaint, pursuant to 720 ILCS 5/24-1.6(a)(1), a person committed the offense of aggravated unlawful possession of a weapon when he or she knowingly carried on or about his or her person or in any vehicle or concealed on or about his or her person except when on his or her land or in his or her abode, legal dwelling, or fixed place of business, or on the land or in the legal dwelling of another person as an invitee with that person's permission, any pistol, revolver, stun gun or taser or other firearm.

2. On March 24, 2025, while Respondent was employed as a Peoria County assistant state's attorney, Respondent, and a man with the initials "D.T." drove to Chicago from Peoria in

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Respondent's black Toyota. While in Chicago, Respondent and D.T. went to a dispensary where D.T. purchased cannabis and Respondent purchased cannabis gummies. Respondent and D.T. placed the cannabis and the cannabis gummies in a backpack and Respondent then placed the backpack in the trunk of her Toyota. Additionally, Respondent had cannabis in an unsealed plastic container in her purse which she had placed in the back seat of her Toyota.

3. At some point during March 24, 2025, D.T. smoked cannabis in Respondent's vehicle. Later that evening, while Respondent was driving back to Peoria from Chicago and while D.T. was asleep in the passenger seat beside her, Respondent saw a Smith & Wesson .38 Special revolver fall out of D.T.'s pants pocket and fall in between the seats of Respondent's car. Respondent retrieved the revolver from between the seats and placed the revolver in her car's center console. Shortly thereafter, Woodford County Sheriff's Deputy Brody Mitchell observed Respondent driving 58 miles per hour in a 45 miles per hour zone on Route 24 in El Paso and conducted a traffic stop of Respondent's Toyota. When Deputy Mitchell approached Respondent's Toyota, he observed the odor of raw cannabis coming from inside the car. Deputy Mitchell informed Respondent that he was conducting the traffic stop because he had observed her speeding through El Paso and asked for her identification and insurance information. After El Paso Police Officer Janeen Henderson arrived on the scene, Deputy Mitchell and Officer Henderson reapproached the vehicle and Deputy Mitchell asked Respondent to exit the vehicle to speak with him. When Deputy Mitchell asked Respondent if she had a weapon or cannabis in her car, she told him that she did not.

4. Respondent's statements to Deputy Mitchell that she did not have cannabis or a weapon in her car were false because Respondent had placed the cannabis that she and D.T. had purchased from the dispensary in the trunk of her Toyota, had raw cannabis in an unsealed

plastic container in her purse in the backseat of her Toyota, and she had placed the revolver in her center console after she saw the revolver fall out of D.T.'s pocket and fall between the seats.

5. At the time Respondent made the statements to Deputy Mitchell that she did not have a weapon or cannabis in her car, she knew the statements were false because she knew that she had both cannabis and a weapon in her car.

6. Deputy Mitchell then conducted a search of Respondent's car and observed that there was cannabis in the trunk of the car and in Respondent's purse in the backseat of the car and located a Smith & Wesson .38 Special and a vape pipe containing cannabis in the center console of Respondent's car. When Deputy Mitchell notified dispatch that he had located the revolver and provided the serial number, dispatch advised Deputy Mitchell that the revolver had previously been reported stolen to the Zion (Illinois) Police Department. After Deputy Mitchell learned the revolver had been reported stolen, he contacted Woodford County Sergeant Cody Geick and requested his presence at the scene, separated Respondent and D.T., and advised Respondent of her *Miranda* rights. Respondent told Deputy Mitchell that she understood her *Miranda* rights and that she was willing to speak to him. Respondent then told Deputy Mitchell that she did not know who the revolver belonged to and that she was unaware that the revolver was in her center console. Deputy Mitchell placed Respondent under arrest for possession of a stolen firearm and placed her in custody.

7. Respondent's statements to Deputy Mitchell that she did not know who the revolver belonged to and that she was unaware that the revolver was in her center console were false because Respondent knew that the revolver had been in the center console of her car because Respondent placed the revolver in the center console after she saw it fall out of D.T.'s pocket and fall between the seats.

8. At the time Respondent made the statements to Deputy Mitchell described in paragraph six, above, she knew the statements were false because Respondent placed the revolver in the center console after she saw it fall out of D.T.'s pocket and fall between the seats.

9. On March 25, 2025, the Woodford County State's Attorney filed a three-count information against Respondent charging her with unlawful possession of a stolen firearm, a Class 2 felony, in violation of 720 ILCS 5/24-3.8(a) (Count I); aggravated unlawful possession of a weapon without a valid Firearm Owners Identification ("FOID") card, a Class 4 felony, in violation of 720 ILCS 5/24-1.6(a)(1) (Count II); and unlawful possession of a firearm without a valid FOID card, a Class A misdemeanor, in violation of 430 ILCS 65/2 (Count III).

10. On April 3, 2025, a Woodford County grand jury found probable cause to indict Respondent for unlawful possession of a stolen firearm, a Class 2 felony, in violation of 720 ILCS 5/24-3.8(a) and aggravated unlawful possession of a weapon without a valid FOID card, a Class 4 felony, in violation of 720 ILCS 5/24-1.6(a)(1).

11. On January 21, 2026, Respondent pled guilty to aggravated unlawful possession of a weapon without a valid FOID card, in violation of 720 ILCS 5/24-1.6(a)(1), a Class 4 felony. In exchange for her guilty plea, the trial court sentenced Respondent to first time weapons offender probation for a period of 24 months and ordered Respondent to perform 300 hours of public service within one year and to pay a \$1,525 fine.

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

- a. committing a criminal act that reflects adversely on her honesty, trustworthiness, or fitness as a lawyer in other respects, by committing the criminal offense of aggravated unlawful possession of a weapon without a valid FOID card, in violation of 720 ILCS 5/24-1.6(a)(1), 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 making false statements to Deputy Mitchell described in paragraphs three and six, above, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

COUNT II

(False Statements to Disciplinary Authority)

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

14. On March 20, 2026, Respondent and her counsel participated via the Zoom video conference platform in a sworn statement concerning the events described in Count I, above. As part of that sworn statement, Respondent took an oath to tell the truth.

15. During the sworn statement, Respondent testified that she did not purchase cannabis on March 24, 2025, and that the vape containing cannabis that Deputy Mitchell found in the center console of Respondent's Toyota belonged to D.T.

16. Respondent's statements described in paragraph 15, above, were false because both Respondent and D.T. purchased cannabis on March 24, 2025, and because Respondent had used the vape earlier in the day on March 24, 2025, and then placed the vape back in the center console of her Toyota after she had used it.

17. At the time Respondent made the statements described in paragraph 15, above, she knew the statements were false because she purchased cannabis on March 24, 2025, and she used the vape earlier in the day on March 24, 2025, and placed the vape back in the console of her Toyota before she drove to Chicago.

18. During the sworn statement, Respondent also testified that she did not tell Deputy Mitchell that the revolver belonged to D.T. because, at the time Deputy Mitchell asked her about the revolver, D.T. was standing next to her with his arm around her and was squeezing her, but

testified that, after she and D.T. were separated, she admitted that the revolver belonged to D.T. and that she had placed the revolver in her center console.

19. Respondent's statements described in paragraph 18, above, were false, because, after Deputy Mitchell had placed D.T. in the backseat of Sgt. Geick's police vehicle, he repeatedly questioned Respondent about the revolver and Respondent repeatedly denied that she knew who the revolver belonged to or that the revolver was in her center console.

20. At the time Respondent made the statements described in paragraph 18, above, she knew the statements were false because she knew that she did not admit to Sgt. Geick that the revolver belonged to D.T. and that she had placed the revolver in her center console until after Deputy Mitchell had placed her under arrest, handcuffed her, and placed her in the backseat of his vehicle.

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

- a. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including making the false statements described in paragraphs 15 and 18, above, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

WHEREFORE, the Administrator requests that this case be assigned to a panel of the Hearing Board, that a hearing be conducted, that the panel make findings of fact and conclusions of fact and law, and a recommendation for such discipline as is warranted.

Respectfully submitted,

Lea S. Gutierrez, Administrator
Attorney Registration and
Disciplinary Commission

By: /s/ Tammy L. Evans
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