

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

IN THE MATTERS OF:

KURT ALEXANDER MULLER,
Attorney Respondent.

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Commission No.
2025 PR 00048

RESPONDENT'S ANSWER TO COMPLAINT

Now comes your Respondent, Kurt Alexander Muller, and as and for his Answer to the Complaint brought pursuant to Supreme Court Rule 770, states as follows;

COUNT I

1. Respondent admits the allegations stated in paragraph one.
2. Respondent neither admits nor denies the allegations stated in paragraph two and demands strict proof thereof.
3. Respondent neither admits nor denies the allegations stated in paragraph three and demands strict proof thereof.
4. Respondent admits the allegations stated in paragraph four.
5. Respondent admits the allegations stated in paragraph five.
6. Respondent neither admits nor denies the allegations stated in paragraph six and demands strict proof thereof.
7. Respondent denies the allegations stated in paragraph seven and demands strict proof thereof.
8. Respondent denies the allegations stated in paragraph eight.
9. Respondent neither admits nor denies the allegations stated in paragraph nine and demands strict proof thereof.
10. Respondent denies the allegations stated in paragraph ten and affirmatively states that the Respondent NEVER met with N.S. at the parties' home, nor met with them for 15 minutes.
11. Respondent denies the allegations stated in paragraph eleven and affirmatively states that the Respondent had NO conversation with N.S. as to the truth or falsity of an

affidavit's statements; that she was 'at risk' of losing custody; discussing any likelihood of the affidavit affecting custody; being part to any threats to N.S. of any allegations of being 'mentally unstable'; nor engaging in ANY acts where N.S. felt coerced.

12. Respondent admits the allegations stated in paragraph twelve and affirmatively states that the sole reason for Respondent's preparation of the affidavit was to aid in his client's CRIMINAL defense, and to preserve N.S.'s recollection of the events on or about October 7, 2022 which could serve to exculpate J.T. from Rush Hospital's allegations of assault and battery against him.

13. Respondent denies the allegations stated in paragraph thirteen and affirmatively states, again, that Respondent did neither meet nor speak with N.S., nor believed that her counsel (for the Family matter) was necessitated for her participation in seeking to exculpate her husband from a specious CRIMINAL charge.

14. Respondent denies the allegations stated in paragraph fourteen and demands strict proof thereof.

15. Respondent denies the allegations stated in paragraphs fifteen (a) and fifteen (b).

WHEREFORE, Respondent seeks the entry of an Order Striking and Dismissing Count I of the Commission's Complaint for such other and further relief as deemed just and equitable.

COUNT II

Respondent incorporates the above statements and additionally states as follows:

16. Respondent neither admits nor denies the allegations stated in paragraph sixteen and demands strict proof thereof.

17. Respondent admits the allegations stated in paragraph seventeen.

18. Respondent admits the allegations stated in paragraph eighteen.

19. Respondent admits the allegations stated in paragraph nineteen and affirmatively states that the shared thread between the Respondent and his client's brother was inadvertent and unintentional.

20. Respondent denies the allegations stated in paragraph twenty and affirmatively states that NO statements included in the unintentionally released thread could reasonably have been interpreted by Ms. Coats as disparaging of her, and if Ms. Coats chose to share the remarks

with her client, it would be SHE who would be at fault for contributing to the disparagement of her client.

21. Respondent admits the allegations stated in paragraph twenty-one and affirmatively states that any references to KARMA is a commonly used expression commonly seen throughout popular culture and could hardly be counted as 'obscurity.'

22. Respondent denies the allegations stated in paragraph twenty-two and affirmatively states that any interpretation by Ms. Coats beyond ordinary discourse between family attorneys presupposes a hypersensitivity beyond any reasonable standard of any ordinary person.

23. Respondent admits the allegations stated in paragraph twenty-three.

24. Respondent admits the allegations stated in paragraph twenty-four and affirmatively states that as Ms. Coats' summation of his Honor's previous indications was incorrect, and widely restrictive, Respondent substituted an alternate order for the court's consideration, with a copy of all to Ms. Coats, so that NO *ex parte* communication could be inferred; and that the submission of competing orders during questions of interpretation is an occasionally employed and recognized practice with the Domestic Relations Division.

25. Respondent denies the allegations stated in paragraph twenty-five and affirmatively states that the presumption that only Ms. Coats' interpretation of what visitation the Respondent's client should've received has been given greater credence than the Respondent's proposed submission by this commission.

26. Respondent admits the allegations stated in paragraph twenty-six.

27. Respondent denies the allegations stated in paragraph twenty-seven and affirmatively states that Ms. Coats initiated electronic exchanges which resulted in this disclosure; nevertheless, it could not reasonably be construed as embarrassing nor an attempt to demean her. Respondent additionally states that despite the acrimony occasioned by these proceedings, the Respondent openly apologized for past misunderstandings to Ms. Coats in the chamber of the Honorable Thomas Kelly and in the presence of the GAL, Mimi Cooper, believing that this would be sufficient to end any errors in past communication.

28. Respondent denies the allegations stated in paragraphs twenty-eight (a) and twenty-eight (b).

WHEREFORE, Respondent prays for the entry of an Order Striking and Dismissing Count II of the Commission's Complaint for such other and further relief as deemed just and equitable.

THE MULLER FIRM, LTD.
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Respectfully Submitted,


THE MULLER FIRM, LTD.

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DISCIPLINARY COMMISSION

IN THE MATTERS OF:

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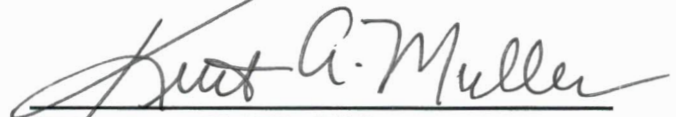
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AFFIDAVIT

1. My name is Kurt Alexander Muller and I am the Respondent to this proceeding.
2. With respect to the allegation contained in paragraphs 2, 3, 6, 9 and/or 16, I am without sufficient available knowledge to either admit or deny same.

FURTHER AFFIDIANT

SAYETH NAUGHT


KURT A. MULLER, ESQ.

SIGNED AND SWORN before me on this
16th day of October, 2025.

