

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

In the Matter of:)
)
ALEJANDRO ANGEL LOPEZ,)
)
Attorney-Respondent,)
)
No. 6280496)

Commission No. 2026PR00049

COMPLAINT

Lea S. Gutierrez, Administrator of the Attorney Registration and Disciplinary Commission, by her attorney, Matthew D. Lango, pursuant to Supreme Court Rule 753(b), complains of Respondent, Alejandro Angel Lopez, who was licensed to practice law in Illinois on November 17, 2003, and alleges that Respondent has engaged in the following conduct which subjects Respondent to discipline pursuant to Supreme Court Rule 770:

COUNT I
(Conversion of \$8,996.34 and Dishonesty - M.M.)

1. At all times related to this complaint, Respondent was the sole signatory on a LaSalle Bank IOLTA trust account with an account number ending in 6806 (“IOLTA account”), which was entitled “Law Office of Alejandro A. Lopez Attorney or Law Firm as Escrowee of Client Funds Under the Illinois IOLTA Program,” and which Respondent used as a depository of funds belonging, presently or potentially, to the firm’s clients, third parties, or to the Respondent.

2. On behalf of his client, an individual with the initials “M.M.”, a party in a divorce case pending in the Circuit Court of Cook County, on September 30, 2024 Respondent received and deposited into his IOLTA account, a Chicago Title and Trust Company check, number 5140090989, which had been dated August 28, 2024 and made payable to Alejandro Lopez, as

Escrowee in the amount of \$12,203.53, as proceeds from the sale of a residence. Respondent received the check for the purpose of making disbursements pursuant to the resolution of M.M.'s divorce matter. No portion of the proceeds of the check represented Respondent's attorney's fees. As of January 1, 2025, Respondent had made no disbursements to or on behalf of M.M. and should have been holding at least \$12,203.53 of the proceeds to M.M. or to third parties.

3. As of January 1, 2025, Respondent had drawn the balance in the IOLTA account down to \$3,207.19 by drawing checks or making withdrawals in payment of his personal or business obligations.

4. As of January 1, 2025, Respondent had used for his own business or personal purposes at least \$8,996.34 of M.M.'s funds, which he should have been holding for the benefit of M.M. or third parties.

5. At no time did Respondent have M.M.'s authority to use any portion of \$12,203.53 escrowed funds for Respondent's personal or business purposes. Respondent's use of the \$8,966.34 of M.M.'s funds as set forth in paragraphs 2 and 3 constitutes conversion of the funds due to M.M. or third parties.

6. In using M.M.'s escrow funds for his own purposes, M.M. acted dishonestly because he knew he was using the escrow funds without M.M.'s authority.

7. By reason of the conduct outlined above, Respondent has engaged in the following misconduct:

- a. by using funds or property, even temporarily, of clients or third persons for the lawyer's own purposes without authorization, by conduct including converting at least \$8,966.34 of escrow funds relating to M.M. to Respondent's own use and causing the balance in the IOLTA account to fall below the amount then belonging to the clients or to third parties, in violation of Rule 1.15(a) of the Illinois Rules of

Professional Conduct (2010) as amended effective July 2023; and

- b. conduct involving dishonesty, fraud, deceit or misrepresentation, by knowingly converting \$8,966.34 of escrow funds to Respondent's own use without authority, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

COUNT II

(Lack of Communication, Failure to Return Unearned Fee, Conversion of \$1,850 Retainer, and Dishonesty – W.P.)

8. On October 30, 2024, a client with the initials "W.P." and Respondent agreed that Respondent would represent W.P. in matters relating to his efforts to seek joint custody of his daughter. W.P. paid Respondent via card \$1,850 as an initial retainer for this matter.

9. Both Respondent and W.P. signed a document that outlined Respondent's hourly billable rate of \$350 an hour and stated that the \$1,850 "initial retainer is property of the client and services performed [by] the attorney will be deducted from the retainer, as services are rendered."

10. At no point between October 1, 2024 and October 1, 2025, did Respondent deposit any funds, including the \$1,850 retainer from W.P., into Respondent's IOLTA Account.

11. At no point between October 30, 2024 to the present, did Respondent complete any substantive legal work, including preparing, filing, or serving a Petition for Allocation of Parental Responsibilities, in furtherance of W.P.'s custody matter.

12. From December 20, 2024 through January 7, 2025, W.P. texted Respondent eight times requesting a status update on the case and Respondent did not reply.

13. As of May 28, 2026, the date of the referral of this complaint to the Inquiry Board, Respondent has not returned the unearned portion of the \$1,850 fee to W.P. and has not responded

to W.P.'s requests for information about his case. The services Respondent provided W.P., if any, do not justify his retention of the entire \$1,850 fee he received from W.P.

14. Respondent's failure to maintain the \$1,850 initial retainer in his IOLTA account, complete any substantive legal work on W.P.'s matter, or return the unearned portion of the retainer to W.P., constitutes conversion of these funds. In failing to maintain W.P.'s funds in his IOLTA and complete any substantive legal work on W.P.'s matter, Respondent acted dishonestly because he did not have W.P.'s permission to use this retainer for any other purpose.

15. By reason of the conduct outlined above, Respondent has engaged in the following misconduct:

- a. failing to promptly comply with reasonable requests for information, by conduct including failing to return W.P.'s repeated texts in violation of Rule 1.4(a)(4) of the Illinois Rules of Professional Conduct (2010);
- b. by using funds or property, even temporarily, of clients or third persons for the lawyer's own purposes without authorization, by conduct including converting at least \$1,850 of W.P.'s retainer in violation of Rule 1.15(a) of the Illinois Rules of Professional Conduct (2010) as amended effective July 2023;
- c. failing to deposit in a client trust account funds received to secure payment of legal fees and expenses by conduct including failing to deposit the \$1,850 initial retainer from W.P. into Respondent's IOLTA account, in violation of Rule 1.15(d) of the Illinois Rules of Professional Conduct (2010);
- d. failing to refund an unearned fee, by conduct including failing to return any portion of the \$1,850 retainer that W.P. paid to him, in violation of Rule 1.16(d) of the Illinois Rules of Professional Conduct (2010); and
- c. conduct involving dishonesty, fraud, deceit or misrepresentation, by knowingly converting \$1850 of W.P.'s initial retainer to Respondent's own use without authority, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

COUNT III
*(Lack of Diligence, Dishonesty, and Failure to
Refund Unearned Fee - R.R.)*

16. At all times related to this complaint, Respondent was a solo practitioner with an office on the North side of Chicago. Respondent concentrated his practice in the areas of family law and real estate, including landlord-tenant matters.

17. On January 10, 2022, a client with the initials “R.R.” and Respondent agreed that Respondent would represent R.R. in matters relating to his desire to evict tenants from two units in a property that R.R. owned in Chicago. On January 10, 2022, R.R. paid Respondent \$1,200 to begin the eviction process by drafting and serving two five-day notices and a letter as required by the City of Chicago for each of the tenants he was seeking to evict.

18. On March 16, 2022, R.R. paid Respondent an additional \$448 for court costs related to one of the eviction cases.

19. At no time between January 10, 2022 and the date of the filing of this complaint did Respondent generate or serve five-day notices and City of Chicago letters regarding R.R.’s eviction matters.

20. At no time between March 16, 2022 and the date of the filing of this complaint, did Respondent file a complaint in the Circuit Court of Cook County, or any other court, with regard to either of R.R.’s eviction matters.

21. On October 10, 2023, R.R. hired a new attorney to represent him in efforts to evict the two tenants. R.R.’s new attorney searched the records of the Clerk of the Circuit Court of Cook County and determined that Respondent had never commenced any eviction proceedings on behalf of R.R.

27. Respondent knew his statement was false because Respondent knew that he had not filed the eviction case and there was no court date on December 3, 2024 or any other date.

28. At no time between October 11, 2024 and the date of the filing of this complaint, did Respondent file a complaint in the Circuit Court of Cook County or any other court with regard to Y.G.A.'s eviction matter nor did Respondent complete any other legal work with regard to this eviction matter.

29. On November 7, 2024, Respondent returned the \$400 fee to Y.G.A.

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

- a. failing to act with reasonable diligence and promptness in representing a client, by conduct including failure to file a complaint in the Circuit Court of Cook County in Y.G.A.'s eviction matter in violation of Rule 1.3 of the Illinois Rules of Professional Conduct (2010); and
- b. conduct involving dishonesty, fraud, deceit or misrepresentation, by telling Y.G.A. that he had filed a case in court with a return date of December 3, 2024 when no such case had been filed, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

COUNT V

(Failure to Keep Required Client Trust Account Records)

31. The Administrator realleges and incorporates paragraphs 1 through 30, above.

32. Effective September 1, 2011, and prior to July 1, 2023, Rule 1.15(a)(1) through (7) of the Illinois Rules of Professional Conduct (2010) required Respondent to prepare and maintain records relating to his client trust accounts.

22. In or around February 2025, more than three years after accepting payment from R.R., Respondent returned to R.R. the unearned fee of \$1,648 for both eviction matters.

23. By reason of the conduct outlined above, Respondent has engaged in the following misconduct:

- a. failing to act with reasonable diligence and promptness in representing a client, by conduct including failing to take any action with regard to R.R.'s two eviction matters in violation of Rule 1.3 of the Illinois Rules of Professional Conduct (2010);
- b. failing to timely refund an unearned fee, by conduct including failing to promptly return any unearned portion of the \$1,648 fee that Respondent received from R.R. in January and March 2022 until February 2025 in violation of Rule 1.16(d) of the Illinois Rules of Professional Conduct (2010); and

COUNT IV

(Lack of Diligence and Dishonesty – Y.G.A.)

24. On October 11, 2024, a client with the initials "Y.G.A." and Respondent agreed that Respondent would represent Y.G.A. in matters relating to his desire to evict a tenant from Y.G.A.'s property. Y.G.A. paid Respondent \$400 to draft and file the Forcible Entry and Detainer action and service of the Forcible Entry and Detainer.

25. As of November 2024, Respondent had not filed a Forcible Entry and Detainer in court. In or around November 2024, Respondent advised Y.G.A. over the phone that he had filed a Forcible Entry and Detainer in Y.G.A.'s eviction case in the Circuit Court of Cook County with a return date on December 3, 2024.

26. Respondent's November 2024 statements to Y.G.A. concerning the pendency of the eviction case and the return date of December 3, 2024 were false because Y.G.A.'s eviction case had never been filed in court.

33. Effective July 1, 2023, Rule 1.15A(b)(1) through (7) of the Illinois Rules of Professional Conduct (2010) required Respondent to prepare and maintain records relating to his client trust accounts.

34. At no time from January 2022 through October 2025 did Respondent prepare and maintain receipt and disbursement journals for his client trust accounts, pursuant to Rule 1.15(a)(1) and Rule 1.15A(b)(1).

35. At no time from January 2022 through October 2025 did Respondent prepare and maintain contemporaneous client ledger records for each separate client, pursuant to Rule 1.15(a)(2) and Rule 1.15A(b)(2).

36. At no time from January 2022 through October 2025 did Respondent prepare and maintain three-way reconciliation reports of his client trust account on at least a quarterly basis, pursuant to Rules 1.15(a)(7) and Rule 1.15A(b)(7).

37. By reason of the conduct described above that occurred before July 1, 2023, Respondent has engaged in the following misconduct:

- a. failing to prepare and maintain complete records of a client trust account, by conduct including failing to prepare and maintain receipt and disbursement journals, contemporaneous client ledger records, and, on at least a quarterly basis, three-way reconciliation reports, in violation of Rule 1.15(a) of the Illinois Rules of Professional Conduct (2010).

38. By reason of the conduct described above that occurred on or after July 1, 2023, Respondent has engaged in the following misconduct:

- b. failing to prepare and maintain complete records of a client trust account, by conduct including failing to prepare and maintain receipt and disbursement journals, contemporaneous client ledger records, and, on at least a quarterly basis, three-way reconciliation reports, in violation of Rule 1.15A(b) of the Illinois Rules of Professional Conduct (2010).

COUNT VI
(Failure to Cooperate with a Disciplinary Investigation)

39. The Administrator realleges and incorporates paragraphs 1 through 38 above.

40. Between October 17, 2024 and January 28, 2025, the Administrator initiated four investigations of Respondent from four different former clients related to Respondent's handling of their cases. After reviewing the correspondence, the Administrator docketed investigations into each of their allegations as matters 2024IN03749, 2024IN04255, 2025IN00282, and 2025IN000298, respectively. Accordingly, between October 17, 2024 and January 28, 2025, counsel for the Administrator sent Respondent letters via email to the address Respondent previously provided the registration department at the ARDC during the annual registration process mandated by Supreme Court Rule 756, requesting that Respondent submit responses and documentation regarding each of the allegations. Respondent responded to counsel for the Administrator's letters in connection with investigations 2024IN03749 and 2024IN04255 and provided some of the additional information requested. Respondent then stopped responding to counsel for the Administrator's letters and did not provide any responses in connection with investigations 2025IN00282 or 2025IN00298.

41. On March 11, 2025, counsel for the Administrator sent additional letters advising Respondent that he had 14 days to provide documentation related to investigations 2025IN00282 and 2025IN00298, and reminding him of his obligation to cooperate in these investigations as outlined in Rule 8.1(b) of the Illinois Rules of Professional Conduct.

42. As of March 11, 2025, Respondent had not responded to counsel for the Administrator's request for information in connection with investigations 2025IN00282 or 2025IN00298.

43. On January 7, 2026, in relation to the four investigations pending against him, the Administrator issued a subpoena that required Respondent's appearance for a sworn statement via Microsoft Teams on February 3, 2026 at 10:00 AM, and for the production of documents by January 27, 2026. Respondent was personally served at his residence on January 9, 2026.

44. As of the date of the filing of this complaint, Respondent has not produced any of the documents required by the subpoena.

45. On February 3, 2026, at 8:14 AM, Respondent emailed counsel for the Administrator and stated that he needed to reschedule his sworn statement because he needed to appear in court that morning at 10:30 AM. Respondent requested the sworn statement be rescheduled for February 25, 2026. Counsel for the administrator rescheduled the statement for February 25, 2026 at 10:30 AM.

46. On February 25, 2026, Respondent did not appear for his sworn statement, 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 thereafter, nor has it been waived or excused.

47. 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 not responding to the Administrator's multiple requests for documents, pursuant to two of the Administrator's subpoenas requesting Respondent's production of documents in violation of Rule 8.1(b) of the Illinois Rules of Professional Conduct (2010).

WHEREFORE, the Administrator respectfully requests that this matter be assigned to a panel of the Hearing Board, that a hearing be held, and that the panel make findings of fact, 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/ Matthew D. Lango
Matthew D. Lango

Matthew D. Lango
Counsel for Administrator
130 E. Randolph Drive, Suite 1500
Chicago, Illinois 60601
Telephone: (312) 565-2600
Email: mlango@iadc.org
Email: ARDCeService@iadc.org

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