SUPREME COURT, STATE OF COLORADO ORIGINAL PROCEEDING IN DISCIPLINE BEFORE THE OFFICE OF THE PRESIDING DISCIPLINARY JUDGE 1300 BROADWAY, SUITE 250 DENVER, CO 80203	
Complainant: THE PEOPLE OF THE STATE OF COLORADO **Respondent:** CHUCK ODIFU EGBUNE, #26022	Case Number: **24PDJ081**
AMENDED OPINION IMPOSING SANCTIONS UNDER C.R.C.P. 242.31(b)[1]	

SUMMARY

Following a sanctions hearing, the Presiding Disciplinary Judge disbarred Chuck Odifu Egbune, attorney registration number 26022 ("Respondent"). The disbarment is scheduled to take effect on **July 16, 2025**.

Respondent was suspended from the practice of law in June 2023. Even though he knew he could not engage in the practice of law thereafter, he continued to represent his sister by filing briefs and appellate pleadings on her behalf. By assisting his sister, Respondent engaged in the unauthorized practice of law in violation of Colo. RPC 5.5(a), which prohibits a lawyer from practicing law in Colorado without a valid license to practice law unless otherwise specifically authorized.

I. PROCEDURAL HISTORY

The People filed a complaint in this case on October 18, 2024. Under C.R.C.P. 242.26, Respondent's answer was due by November 15, 2024. But Respondent did not submit any filing before that date.

Only on Sunday, December 8, 2024, did Respondent attempt to file a motion seeking additional time to submit his answer. He backdated his motion to December 5, 2024. In that motion, Respondent represented that he planned to be out of the country on a religious retreat beginning December 5, 2024, and he asked the Court to extend his deadline to answer until February 17, 2025. Citing filing deficiencies, the Court's administrator rejected Respondent's

[1] The Court **AMENDS** the previously issued opinion under C.R.C.P. 60(a) to correct a clerical mistake on the disbarment effective date.

motion on Monday, December 9, 2024, and invited Respondent to resubmit his motion with those deficiencies corrected.

The People moved for entry of default on December 9, 2024, as required under C.R.C.P. 242.27. The same day, the Court issued an order directing Respondent to answer the People's complaint and to respond to their motion for default no later than December 30, 2024. The Court sent that order to Respondent's registered mailing and email addresses.[2]

On December 30, 2024, Respondent filed "Respondent's Motion for an Extension of Time to File a Response to the People's Motion for Default under C.R.C.P. 242.27." In that filing, Respondent represented that he was out of the country on a religious retreat, which required him to avoid litigation during the retreat. But he provided no further evidence, including information about his religious practice, to support his proffer. More importantly, however, Respondent did not provide any information to justify why he failed to timely answer before its due date, November 15, 2024. On January 24, 2025, the Court issued an order on his motion. In that order, the Court expressed its preference to resolve this matter on the merits, with the benefit of Respondent's participation, and thus granted Respondent a limited extension to January 31, 2025, to file his answer and his response to the People's motion for default. But Respondent failed to submit a filing by January 31, 2025.

A week after Respondent's deadline to answer had lapsed—on February 7, 2025—the Court granted the People's motion for default and entered default. In that order, the Court directed the People to file an affidavit consistent with C.R.C.P. 121 section 1-14. The Court then set this matter for a sanctions hearing to take place on April 24, 2025.

On February 21, 2025, Respondent filed "Respondent's Motion for an Extension of Time to File Any Post Judgment Motion." In that motion, Respondent asserted that he did not comply with the Court's January 2025 order because his email provider routed the order to a spam folder. On March 5, 2025, the Court denied that motion, explaining that a posttrial motion under C.R.C.P. 60(b) was premature because the Court had entered default but had not yet entered judgment. Wishing to expedite litigation involving a motion to set aside entry of default, the Court set a deadline to file any such motion for Monday, March 10, 2025.

That day, Respondent timely filed a three-page motion to set aside default. After considering Respondent's motion and the People's response, the Court denied his motion on April 9, 2025. The Court concluded that setting aside the default would be improper under C.R.C.P. 55(c), as Respondent failed to show that the neglect causing the default was excusable; he never alleged any defense, let alone a meritorious one; and he did not demonstrate that relieving him of the entry of default would be equitable.

[2] On December 30, 2024, the United States Postal Service sent back the order as returned mail from Respondent's registered address.

On April 10, 2025, Respondent filed a nine-page motion to reconsider the order issued the previous day. The Court denied that motion on April 15, 2025, concluding that Respondent failed to meet the standards justifying reconsideration of his motion to set aside default and cautioning Respondent that it would hear no further argument in support of his request to set aside entry of default.

The Court convened the scheduled sanctions hearing on April 24, 2025. Kristofco attended on behalf of the People, and Respondent appeared pro se. At the hearing, the Court first entertained argument on "Respondent's Motion to Dismiss Pursuant to Anti-Slapp Statute and P.O.M.E.," which he filed on April 17, 2025. The Court reserved ruling on that motion but determined that because the motion did not encompass all of the People's allegations, the sanctions hearing could go forward. The Court thus heard testimony from Victor Morales, Matthew Chudacoff, and Respondent. No exhibits were admitted into evidence.

II. ORDER DENYING RESPONDENT'S MOTION TO DISMISS

The week before trial, Respondent filed his motion to dismiss. Given the proximity of the hearing date, the Court did not require the People to respond in writing. Instead, it advised the parties that it would hear oral argument on the motion at the scheduled sanctions hearing.

At the hearing, Respondent argued that his underlying conduct in advancing litigation was protected by the First Amendment under *Protect Our Mountain Environment, Inc. v. District Court* ("*POME*").[3] Per *POME,* he said, the People were required to show that the underlying litigation—in which he claimed that he represented himself and not his sister, Felicia Aniniba—was both objectively baseless and was based on subjectively improper motivation.[4] He also pointed to *Ferraro v. Frias Drywall, LLC,* [5] to argue that the Court has discretion to sua sponte examine the sufficiency of the People's complaint and set aside default on the grounds that he was not engaged in the underlying litigation in a representative capacity.

The People opposed dismissal, asserting that Respondent's motion was untimely. The People also disputed the factual basis of Respondent's motion: they do not seek to discipline Respondent for litigating his own case, they said. Rather, they claimed, they brought a complaint against Respondent based exclusively on his conduct in litigating on his sister's behalf.

The Court cannot grant Respondent's motion to dismiss. First, Respondent's motion under *POME* is not jurisdictional. Instead, his motion merely asserts a defense, which he forfeited when he failed to answer the People's complaint. The Court thus agrees with the People that Respondent's motion is untimely. But even if the Court considered the merits of Respondent's

[3] 677 P.2d 1361 (Colo. 1984).
[4] *See In re Foster*, 253 P.3d 1244, 1254-55 (Colo. 2011) (applying *POME* to prohibit professional sanctions on a lawyer who engaged in pro se litigation absent such a heightened showing).
[5] 2019 COA 123.

motion, the People's unanswered complaint plainly shows that their allegations are premised on Respondent acting in a representative capacity by writing his sister's appeal brief,[6] by filing her appeal brief,[7] and by drafting or assisting her to draft appellate pleadings.[8] The Court thus finds that the People's allegations do not support Respondent's argument that he was engaged in pro se litigation. As such, the People need not make a heightened showing under *POME*. The Court **DENIES** Respondent's motion to dismiss.

III. ESTABLISHED FACTS AND RULE VIOLATIONS

The Court adopts and incorporates by reference the facts of this case as fully detailed in the complaint. Respondent was admitted to the practice of law in Colorado on October 23, 1995, under attorney registration number 26022. He is thus subject to the jurisdiction of the Colorado Supreme Court and the Court in this disciplinary proceeding.

Always Enterprises, d/b/a A-1 Bail Bonds, loaned Respondent $35,000.00 through a promissory note secured by a deed of trust on Respondent's personal home. On November 19, 2015, A-1 Bail Bonds, by and through its lawyer Larry Henning, filed a foreclosure action against Respondent.

On January 23, 2017, A-1 Bail Bonds filed a "Verified Motion for Order Authorizing Sale," which was granted March 14, 2018, *nunc pro tunc* to May 19, 2017. The property was purchased by Breckenridge Property Fund 2016, LLC ("Breckenridge").

On November 9, 2017, Respondent filed a complaint in Douglas County, Colorado, case number 2017CV31060, against A-1 Bail Bonds and Henning, alleging fraud, negligence, and other claims.

At some point, Respondent executed a $450,000.00 deed of trust on his home for the benefit of his sister, Felicia Aninibа. Although the deed of trust was dated 2016, it was not recorded with the Douglas County Clerk and Recorder until 2021. Ultimately, the Douglas County District Court determined the $450,000.00 deed of trust was fraudulent.

At various times during the foreclosure action (consolidated with case number 2017CV31060 in Douglas County District Court), Respondent stated via filed court pleadings and statements to the court that he was representing his sister, Aninibа, as well as representing himself.

Respondent was suspended from the practice of law for three years beginning June 9, 2023. On June 23, 2023, the court in case 2017CV31060 issued findings of fact, conclusions of law, and judgment against Respondent and Aninibа.

[6] Compl. ¶ 17.
[7] Compl. ¶ 18.
[8] Compl. ¶ 19.

On July 17, 2023, Respondent filed a "Motion to Vacate Judgment pursuant to Rule 59 on the claims of Breckenridge and Judgment Creditors." Respondent knew at the time he filed that motion that he had been suspended from practicing law in Colorado. In his "Motion to Vacate Judgment pursuant to Rule 59 on the claims of Breckenridge and Judgment Creditors," signed and filed after the date of his suspension, Respondent asserted the following legal arguments on behalf of Aniniba:

- On page six, the motion stated, "Mr. Egbune will now turn next to the question of the propriety of the money judgments imposed by this court against the fraudulent transferee, Ms. Aniniba. It is the general rule that as long as the subject property remains in the possession of the fraudulent transferee in toto and is not depreciated by any action of the fraudulent transferee, a personal judgment against such transferee will not be sustained. Thus, this court's money judgment against Ms. Aniniba without showing that she depreciated the property is again not authorized by law. Miller v. Kaiser, 164 Colo. 206, 433 P.2d 772 (1967); See also Emarine v. Haley, 892 P.2d 343, 348- 49 (Colo.App.1994) (The primary remedy in an action for fraudulent conveyance is to return the property fraudulently conveyed to its prior status of ownership, thereby bringing it within reach of the judgment creditor of the fraudulent transferor)."

- On page eight, the motion stated, "This court should take judicial notice that Ms. Aniniba voluntarily filed a motion agreeing to her deed being subordinated on this matter very early on the proceeding. This is akin to a reconveyance. Mr. Egbune has not found a case where a transferee agreed to have her interest subordinated under CUFTA as was done by Ms. Aniniba. However, the Connecticut Supreme Court has considered whether reconveyance or a transferred asset may release the transferee from liability under Connecticut's CUFTA. which is substantially similar to CUFTA. See Robinson v Coughlin. 266 Conn. 1, 830 A.2d 1114 (2003)."

- On page nine, the motion stated, "Because Ms. Aniniba voluntarily moved to have her interests subordinated before judgment entered on this case, equity requires that Breckenridge be barred from any CUFTA claim here. Ms. Aniniba was not under any legal obligation to agree to subordination. she morally chose to do so. Therefore, equity should preclude Breckenridge from any CUFTA claims."[9]

While Respondent was suspended from the practice of law, he assisted his sister, Aniniba, to write her appeal brief for the Colorado Court of Appeals. On March 26, 2024, Aniniba filed her appeal brief in Colorado Court of Appeals cases 2023CA1721 and 2023CA1722, which Respondent assisted her to write. Respondent drafted or assisted with drafting the appellate pleadings filed in his sister's name, but he failed to note his assistance in any of them.

Aniniba's appeal brief stated, "Unfortunately, Mr. Egbune's license to practice law was suspended mid trial so he stopped representing me from that time. However, he saw the

[9] Compl. ¶¶ 16(a)-(c).

suspension coming and drafted the appeal before he was suspended and gave to me in anticipation knowing that the Judge was biased against him."[10]

Respondent must have assisted Aniniba with her appeal brief after he was suspended because he was suspended before the final order being appealed was entered; as a result, he could not have known before the effective date of his suspension what evidence would be admitted at the trial, what rulings the court would make throughout the entire trial, or the final judgment the court would enter—all of which appears in Aniniba's brief. Further, the appellate filings are consistent with Respondent's writing style and level of legal knowledge, whereas his sister has no legal training and acknowledged during the underlying litigation that she had little or no understanding of the nature of the proceedings.

Through this conduct, Respondent violated Colo. RPC 5.5(a), which prohibits a lawyer from practicing law in Colorado without a valid license to practice law issued by the Colorado Supreme Court unless specifically authorized by C.R.C.P. 204 or C.R.C.P. 205 or federal or tribal law. Although Respondent's license to practice law in Colorado was suspended as of June 9, 2023, and although Respondent knew he could not engage in the practice of law, he continued to represent his sister in legal proceedings. He engaged in the unauthorized practice of law when he filed a brief on July 17, 2023, in Douglas County District Court, asserting numerous legal arguments on behalf of Aniniba. In addition, Respondent knew he could not practice law when he assisted Aniniba with her appeal brief in Colorado Court of Appeals cases 2023CA1721 and 2023CA1722. By assisting her, Respondent engaged in the unauthorized practice of law in violation of Colo. RPC 5.5(a).

IV. SANCTIONS

The American Bar Association *Standards for Imposing Lawyer Sanctions* ("ABA *Standards*")[11] and Colorado Supreme Court case law guide the imposition of sanctions for lawyer misconduct.[12] When imposing a sanction after a finding of lawyer misconduct, the Court must consider the duty the lawyer violated, the lawyer's mental state, and the actual or potential injury the lawyer's misconduct caused. These three variables yield a presumptive sanction that the Court may then adjust based on aggravating and mitigating factors.

ABA *Standard* 3.0 – Duty, Mental State, and Injury

Duty. Respondent violated the duties he owed as a professional by disregarding his order of suspension and practicing law without authorization.

[10] Compl. ¶ 20.
[11] Found in ABA *Annotated Standards for Imposing Lawyer Sanctions* (2d ed. 2019).
[12] *See In re Roose*, 69 P.3d 43, 46-47 (Colo. 2003).

Mental State: Respondent acted knowingly when he engaged in the unauthorized practice of law on his sister's behalf.

Injury: Victor Morales and Matthew Chudacoff testified at the hearing as to the harm resulting from Respondent's actions, including the time and money their clients spent addressing the arguments Respondent made impermissibly.

Morales represented Henning, who in turn represented A-1 Bail Bonds. Having litigated against Respondent for around a decade, Morales became quite familiar with Respondent's writing style and litigation approach. According to Morales, Respondent's and Aniniba's briefs mirrored one another: just like Respondent's briefs, Aniniba's filings were disorganized and difficult to understand. Morales had no doubt that Respondent wrote Aniniba's filings for her. In Morales's view, Respondent's unauthorized law practice unnecessarily expanded litigation, harming Morales's client by forcing him to incur an "endless parade of attorney's fees" to defend claims that he considered to be groundless. Morales estimated that attorney's fees related to Respondent's unauthorized law practice came to between $25,000.00 and $30,000.00.

Chudacoff, who represented Breckenridge in the litigation, also testified about the harm occasioned by Respondent's unauthorized practice of law. Chudacoff testified that Aniniba's post-trial litigation and appeal—orchestrated by Respondent—unnecessarily cost his client additional money to fund a defense. Chudacoff estimated that his client spent approximately $23,000.00 in legal fees attributable to Respondent's unauthorized representation of Aniniba.

Finally, the Court finds that Respondent's decision to disobey his order suspending him from the practice of law undermined the authority and dignity of the legal system and corroded the reputation of lawyers.

ABA *Standards* 4.0-8.0 – Presumptive Sanction

The People contend the presumptive sanction in this case should be set with reference to ABA *Standard* 7.1, which generally provides for disbarment when a lawyer knowingly engages in conduct that violates a professional duty with the intent to obtain a benefit for the lawyer or another, thereby causing serious or potentially serious injury to a client, the public, or the legal system. The People also point to ABA *Standard* 8.1(a), which calls for disbarment when a lawyer intentionally or knowingly violates the terms of a prior disciplinary order and causes injury or potential injury to a client, the public, the legal system, or the profession.

Respondent does not rely on any ABA *Standard* and instead argues that no discipline is warranted because he did not knowingly violate the law. He also contends that the Court failed to give him a fair opportunity to defend himself.

The Court finds that ABA *Standard* 8.1(a) best fits the facts here. Respondent, a suspended lawyer, knowingly engaged in conduct that amounted to the unauthorized practice of law, thereby

violating his suspension order. By ghostwriting appellate filings for his sister, he flouted disciplinary orders, injuring the legal system and the profession, and needlessly expanded the litigation, taxing parties' and the court's resources. The Court thus begins its analysis with disbarment as the baseline sanction.

ABA *Standard* 9.0 – Aggravating and Mitigating Factors

With disbarment as the presumptive sanction, the Court next assesses aggravating factors, which are any considerations that may justify an increase in the degree of the sanction to be imposed, as well as mitigating factors, which are circumstances that may warrant a reduction in sanction's severity.[13] As outlined below, the Court applies three factors in aggravation and no factors in mitigation.

Aggravating Factors Under ABA *Standard* 9.22

Prior Disciplinary Offenses – 9.22(a): Respondent has thrice been disciplined. In case number 04PDJ039, Respondent was suspended for six months, with all but thirty days stayed pending his successful completion of a two-year period of probation. In case number 15PDJ025, Respondent stipulated to a public censure. Finally, in case number 22PDJ029, a hearing board suspended Respondent for three years.[14] The Court thus applies this factor in aggravation.

Dishonest or Selfish Motive – 9.22(b): The People ask the Court to apply this factor, arguing that Respondent acted selfishly by asserting legal arguments on his sister's behalf so that he could continue to live in his home while the litigation was pending. Although Respondent likely would have derived some benefit if he or his sister prevailed in—or even stretched out—the litigation, the record lacks sufficient evidence to conclude that Respondent was motivated by dishonesty or selfishness. The Court declines to apply this factor.

Refusal to Acknowledge Wrongful Nature of Misconduct – 9.22(g): At the sanctions hearing, Respondent did not express any regret or remorse for his misconduct. To the contrary, he dug his heels in and justified his actions by insisting, first, that he only represented himself, and second, that he drafted his sister's appellate brief *before* he was suspended (and thus before trial was finished). This defense, which is as incredible as it is audacious, inclines the Court to conclude that Respondent refuses to acknowledge that his misconduct was wrongful. Most telling, however, is Respondent's answer to the Court's inquiry about mitigating factors, including whether he should be given credit for remorse; Respondent answered, "I don't have any remorse because I didn't do anything wrong." The Court applies this aggravating factor.

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[13] *See* ABA *Standards* 9.21 and 9.31.

[14] The Colorado Supreme Court affirmed the hearing board's opinion on February 22, 2024, in case number 23SA101.

Substantial Experience in the Practice of Law – 9.22(i): Respondent was first licensed in 1995. Respondent's suspension took effect on the same day that the trial at issue commenced: June 9, 2023. Because at that point Respondent had over twenty-seven years of experience as a lawyer, this aggravating factor applies.

Mitigating Factors Under ABA *Standard* 9.32

Absence of a Dishonest or Selfish Motive – 9.32(b): Respondent asks the Court to apply this factor, arguing on the one hand that he was not paid for his work, while at the same time contending that Aniniba did her own appellate work. As mentioned above, however, Respondent likely stood to benefit in *some* degree if he or Aniniba succeeded on appeal or even managed to prolong the appellate process. The Court thus declines to apply this factor.

Full and Free Disclosure to Disciplinary Authorities or Cooperative Attitude Toward Proceedings – 9.32(e): Respondent contends this factor applies because, he says, he responded to all of the People's inquiries. The Court declines to apply this factor, however, after taking notice of its own record in this case: Respondent failed to file a timely answer, failed to abide by the Court's orders, and repeatedly attempted to relitigate the Court's entry of default and its refusal to set aside that default.[15] These tactical decisions unnecessarily complicated the litigation in this case and invalidated any claim to cooperation.

Character or Reputation – 9.32(g): Respondent urges the Court to apply this factor. In support, Respondent testified without corroboration that he has helped many clients who have been satisfied with his work; that he has received several good reviews on Google; and that he has done noble work in the immigration field, where he says he assisted clients facing removal, succeeded in inherently difficult asylum cases, and helped people attain lawful permanent resident status in the United States. While the Court does not disbelieve Respondent's account, it does not weigh his testimony in a vacuum, either. Given Respondent's three prior public discipline cases spanning a twenty-year period, the Court cannot find that Respondent's unsupported testimony about his character or reputation should carry any mitigating weight.

Physical Disability – 9.32(h): Respondent testified that he contracted COVID in 2022, that he suffers from tinnitus, and that he faces other afflictions that he did not care to discuss. Respondent did not, however, draw any connection between his misconduct and his ailments. The Court declines to apply this mitigator.

[15] The Court entered default on February 7, 2025. On April 9, 2025, the Court denied Respondent's motion to set aside default. On April 15, 2025, the Court denied Respondent's motion to reconsider its order denying Respondent's motion to set aside default. In that order, the Court stated that it would not hear any further argument on the default issue. In what the Court finds to be an attempt to circumvent the spirit of that directive, Respondent filed his motion to dismiss on April 17, 2025.

Remoteness of Prior Offenses – 9.32(m): Respondent argues that his 2015 discipline is remote in time and is thus entitled to mitigating credit. The Court might be inclined to agree but for Respondent's intervening suspension in 2023. The Court thus declines to apply this factor in mitigation.

Other Mitigation: As Respondent requests, the Court considers three other factors in mitigation not specifically enumerated in ABA *Standard* 9.32:[16]

- Respondent first asks the Court to treat his religious beliefs as a mitigating factor. He testified that he is a member of the African Church of Faith, which has inspired him to try to lead a pious life. Respondent openly discussed the tenets of his belief and his wish to live according his church's teachings. Respondent explained that his religious tradition treats December as a month of penitence, and he often spends that time in his native Nigeria. This past year, he said, he scheduled a longer-than-normal trip, as he thirsted for guidance from his spiritual leaders. Respondent explained that he booked his travel plans to Nigeria some six months prior and could not change those plans without incurring significant expense. He also explained that his spiritual advisors insist that he refrain from using technological devices during the retreat, although he was granted permission to file with the Court a request for an extension of time.

- Relatedly, Respondent implores the Court to understand that he tried to participate and defend himself in this case, given the circumstances. He emphasized that he did not write off or dismiss this proceeding by saying "to heck with it."

- Finally, Respondent asks the Court to consider that in posttrial litigation, Morales and Chudacoff accused Respondent of ghostwriting on behalf of his sister but that the trial court declined to make such a finding or enter an order on those allegations.

Respondent spoke candidly about his religious beliefs and practices in sufficient detail to provide the Court with a better understanding of his perspective, and the Court appreciates Respondent's testimony. But the Court does not find that Respondent's religious practices obviate his obligations to the disciplinary system or that any of his testimony mitigates his misconduct.[17]

[16] *In re Rosen*, 198 P.3d 116, 121 (Colo. 2008) ("While the ABA Standards enumerate a number of such aggravating and mitigating factors, they are expressly intended as exemplary and are not to be applied mechanically in every case.").

[17] As mentioned above, the Court was particularly disturbed that Respondent allowed his deadline to answer to lapse in mid-November before requesting in December 2024 to extend the deadline in a back-dated motion.

Analysis Under ABA *Standards* and Case Law

The Court heeds the Colorado Supreme Court's directive to exercise discretion in imposing a sanction because "individual circumstances make extremely problematic any meaningful comparison of discipline ultimately imposed in different cases."[18] As such, the Court determines the appropriate sanction for a lawyer's misconduct on a case-by-case basis, looking to the ABA *Standards* for guidance in the exercise of that discretion. The ABA *Standards* gives the Court a theoretical framework that provides for "the flexibility to select the appropriate sanction in [a] particular case" after carefully considering the applicable aggravating and mitigating factors.[19]

The Colorado Supreme Court has both suspended and disbarred lawyers who engaged in the unauthorized practice of law.[20] Whether a lawyer is suspended or disbarred has generally hinged on whether the lawyer engaged in the unauthorized practice of law while serving an administrative suspension or a disciplinary suspension. In *People v. Zimmermann*, for example, a lawyer who practiced law while serving a disciplinary suspension was disbarred; there, the Colorado Supreme Court applied ABA *Standard* 8.1(a) because the lawyer violated the terms of a prior *disciplinary* order.[21] In contrast, *People v. Kargol* featured a lawyer who practiced law while he was administratively suspended.[22] The *Kargol* court suspended the lawyer, relying on ABA *Standard* 6.22, which applies when a lawyer knowingly violates a court order or rule.[23] The Court construes these cases to support disbarment in this case, as Respondent practiced law in violation of his *disciplinary* order.

This result accords with recent hearing board decisions disbarring lawyers who violated disciplinary suspension orders by practicing law. In *People v. Romero*, a hearing board disbarred a lawyer who, without supervision, drafted a prenuptial agreement for his firm's client.[24] In *People v. Layton*, a hearing board disbarred a lawyer who both litigated on her own behalf and also served in a representative capacity while she was suspended.[25] And in *People v. Maynard*, a hearing board disbarred a suspended lawyer who acted as a shadow adviser and ghostwriter in litigation, thereby engaging in the practice of law.[26] These cases, which share themes similar to Respondent's, convince the Court that disbarment is not only consistent with other disciplinary decisions but also the most appropriate sanction for Respondent's misconduct.

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[18] *In re Attorney F.*, 2021 CO 57, ¶ 20 (*quoting Rosen*, 198 P.3d at 121).
[19] *Attorney F.*, ¶ 19.
[20] *See*, *e.g.*, *People v. Redman*, 902 P.2d 838, 840 (Colo. 1995); *People v. Zimmermann*, 960 P.2d 85 (Colo. 1998); *People v. Kargol*, 854 P.2d 1267 (Colo. 1993); *People v. Ross*, 873 P.2d 728 (Colo. 1994).
[21] 960 P.2d at 88.
[22] 854 P.2d at 1269.
[23] *Id.*
[24] 536 P.3d 353, 380 (Colo. O.P.D.J. 2023).
[25] 531 P.3d 34, 61 (Colo. O.P.D.J. 2023).
[26] 483 P.3d 289, 299-302 (Colo. O.P.D.J. 2021).

V. CONCLUSION

Respondent disregarded an order suspending his license to practice law when he assisted his sister by ghostwriting her posttrial filings and appellate briefs. By doing so, he extended the litigation, forced his opposing parties to expend significant sums in attorney's fees to defend against those filings, undermined the legal system by violating the duty he owes as a professional to obey court orders, and harmed the reputation of lawyers. Respondent's misconduct warrants disbarment.

VI. ORDER

The Court **ORDERS:**

1. **CHUCK ODIFU EGBUNE**, attorney registration number **26022**, is **DISBARRED** from the practice of law in Colorado. The disbarment will take effect upon issuance of an "Order and Notice of Disbarment."[27]

2. Respondent **MUST** promptly comply with C.R.C.P. 242.32(b)-(e), concerning winding up of affairs, notice to current clients, duties owed in litigation matters, and notice to other jurisdictions where he is licensed or otherwise authorized to practice law.

3. Within fourteen days of issuance of the "Order and Notice of Disbarment," Respondent **MUST** file an affidavit with the Court under C.R.C.P. 242.32(f), attesting to his compliance with C.R.C.P. 242.32. As provided in C.R.C.P. 242.41(b)(5), lists of pending matters, lists of clients, and copies of client notices under C.R.C.P. 242.32(f) must be marked as confidential attachments and filed as separate documents from the affidavit.

4. The parties **MUST** file any posthearing motions **no later than Wednesday, June 25, 2025**. Any response thereto **MUST** be filed within seven days.

5. The parties **MUST** file any application for stay pending appeal **no later than the date on which the notice of appeal is due**. Any response thereto **MUST** be filed within seven days.

6. Respondent **MUST** pay the costs of this proceeding. The People **MUST** submit a statement of costs **no later than Wednesday, June 25, 2025**. Any response challenging the reasonableness of those costs **MUST** be filed within seven days thereafter.

DATED THIS 11th DAY OF JUNE, 2025.

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BRYON M. LARGE
PRESIDING DISCIPLINARY JUDGE

[27] In general, an order and notice of sanction will issue thirty-five days after a decision is entered under C.R.C.P. 242.31(a)(6). In some instances, the order and notice may issue later than the thirty-five days by operation of C.R.C.P. 242.35, C.R.C.P. 59, or other applicable rules.