

The Supreme Court of the State of Louisiana

IN RE: DOUNNISEI KUO GBALAZEH

No. 2025-B-00684

IN RE: Disciplinary Counsel - Applicant Other; Findings and Recommendations
(Formal Charges);

October 01, 2025

Disbarment extended. See per curiam.

PDG

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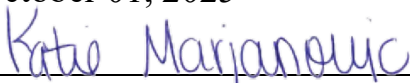
JBM

JMG

CRC

Supreme Court of Louisiana

October 01, 2025



Chief Deputy Clerk of Court
For the Court

SUPREME COURT OF LOUISIANA

NO. 2025-B-0684

IN RE: DOUNNISEI KUO GBALAZEH

ATTORNEY DISCIPLINARY PROCEEDING

PER CURIAM

This disciplinary matter arises from formal charges filed by the Office of Disciplinary Counsel (“ODC”) against respondent, Dounnisei Kuo Gbalazeh, a disbarred attorney.

PRIOR DISCIPLINARY HISTORY

Before we address the current matter, we find it helpful to review respondent’s prior disciplinary history. Respondent was admitted to the practice of law in Louisiana in 2007. On October 1, 2008, she was declared ineligible to practice law for failure to pay her bar dues and the disciplinary assessment. She then failed to file her trust account disclosure statement and failed to comply with the mandatory continuing legal education requirements. She never rectified her ineligibility.

In 2014 and 2015, while she was ineligible to practice law, respondent sought to enroll as counsel in two immigration matters. Respondent also failed to cooperate with the ODC in its investigation of two disciplinary complaints against her. For this misconduct, we suspended respondent from the practice of law for one year and one day. *In re: Gbalazeh*, 17-1704 (La. 12/5/17), 231 So. 3d 21 (“*Gbalazeh I*”). She did not seek reinstatement from her suspension in *Gbalazeh I*.

In 2017, respondent practiced law while she was ineligible to do so, failed to return an unearned fee, and failed to cooperate with the ODC in its investigation. We disbarred respondent for this misconduct. *In re: Gbalazeh*, 20-1111 (La.

11/24/20), 304 So. 3d 849 (“*Gbalazeh II*”). Respondent is not eligible to apply for readmission until November 24, 2025.

Against this backdrop, we now turn to a consideration of the misconduct at issue in the present proceeding.

FORMAL CHARGES

In September 2011, after respondent was deemed ineligible to practice law for failure to comply with her professional obligations, Souleymane Traore hired her to adjust his status on an immigration issue, paying \$1,300 to respondent.¹ When Mr. Traore attempted to contact respondent at her office, Mr. Traore was advised that she had relocated to a new office. Mr. Traore visited respondent at the new office and indicated to her that he no longer wanted to “continue the process with her” and requested a refund. Although she gave Mr. Traore a new date to return to her office to collect the refund, respondent never returned his calls or issued the refund.

In August 2023, Mr. Traore filed a disciplinary complaint against respondent.² Notices of the complaint were sent to both of respondent’s addresses registered with the Louisiana State Bar Association, a potential last known address, and two email addresses. Although delivery to respondent’s private email address was confirmed, she failed to respond to the complaint.

DISCIPLINARY PROCEEDINGS

In September 2024, the ODC filed formal charges against respondent, alleging that her conduct violated Rules 1.1(c) (a lawyer is required to comply with all requirements of the Supreme Court’s rules regarding annual registration, including

¹ The receipts in the record indicate that Mr. Traore paid respondent in \$100 and \$150 increments. All but three of the notations on the receipts indicate that the payments were for “Partial Payment of Legal Fees,” and the remainder were for “Partial Payment of Legal Fees for Divorce.”

² The record does not explain why Mr. Traore waited approximately ten years to file his complaint.

payment of bar dues and the disciplinary assessment, timely notification of changes of address, and proper disclosure of trust account information), 1.5(f)(5) (failure to refund an unearned fee), 5.5(a)(e) (engaging in the unauthorized practice of law), 8.1(c) (failure to cooperate with the ODC), and 8.4(a) (violation of the Rules of Professional Conduct) of the Rules of Professional Conduct.

Respondent failed to answer the formal charges. Accordingly, the factual allegations contained therein were deemed admitted and proven by clear and convincing evidence pursuant to Supreme Court Rule XIX, § 11(E)(3). No formal hearing was held, but the parties were given an opportunity to file with the hearing committee written arguments and documentary evidence on the issue of sanctions. Respondent filed nothing for the committee's consideration.

Hearing Committee Report

After considering the ODC's deemed admitted submission, the hearing committee acknowledged that the factual allegations set forth in the formal charges were deemed admitted and supported by the evidence submitted by the ODC. Based upon these facts, the committee determined that respondent violated the Rules of Professional Conduct as charged.

The committee determined respondent violated duties owed to her client, the public, and the legal profession. Her conduct was knowing, if not intentional, and caused actual and serious harm to the client. Respondent accepted a fee for services that she did not perform, and she failed to return the unearned fee despite repeated demands. The duration of the conversion of client funds has been extensive and respondent has failed to make restitution for same. Based on the ABA's *Standards for Imposing Lawyer Sanctions*, the committee determined the baseline sanction is disbarment.

The committee determined that the following aggravating factors are present: a prior disciplinary record, a dishonest and selfish motive, a pattern of misconduct, multiple offenses, vulnerability of the victim, and indifference to making restitution. The committee noted that respondent failed to meet her burden of proof to establish the presence of any mitigating factors in this matter.

Turning to the issue of an appropriate sanction, the committee noted that the misconduct at issue occurred within the same time period as the misconduct in *Gbalazeh I* and *Gbalazeh II*, and thus, a *Chatelain* analysis is applicable.³ The committee explained that the misconduct at issue commenced in 2011, within the time frame of the misconduct in *Gbalazeh I*, which occurred between 2009 and 2015, and prior to the conduct in *Gbalazeh II*, which occurred between 2017 and 2019. Under *Chatelain*, an appropriate sanction would consider the combined misconduct in this matter and in *Gbalazeh II*. However, the failure to cooperate with the ODC in its investigation occurred after the disbarment in *Gbaalazeh II*, and therefore does not fall under the umbrella of *Chatelain* and must be considered separately.⁴

The committee acknowledged that the facts of this matter fit neatly within the guidance offered in *Chatelain*, where “the overall discipline to be imposed should be determined as if both proceedings were before the court simultaneously.” However, upon reviewing the caselaw citing *Chatelain*, a majority of the committee determined the nature and number of the concurrent acts should be considered in determining an appropriate sanction. The majority indicated that “knowingly and illegally practicing law without a valid license should warrant further sanctions where a specific misconduct is found ‘yet again.’”

³ In *Louisiana State Bar Ass’n v. Chatelain*, 573 So. 2d 470 (La. 1991), this court held that when a second disciplinary proceeding against an attorney involves misconduct which occurred during the same time period as the first proceeding, “the overall discipline to be imposed should be determined as if both proceedings were before the court simultaneously.”

⁴ See, e.g. *In re: Ford*, 14-0831 (La. 6/20/14), 141 So. 3d 800.

For these reasons, a majority of the committee recommended respondent's disbarment be extended for an additional five years, such that she would not be permitted to apply for readmission until November 24, 2030.⁵ The committee further recommended that respondent be required to make restitution to Mr. Traore in the amount of \$1,300 and that she be assessed with the costs and expenses of this matter.

Neither respondent nor the ODC filed an objection to the committee's report or recommendation. Therefore, pursuant to Supreme Court Rule XIX, § 11(G), the disciplinary board submitted the committee's report directly to the court for review.

DISCUSSION

Bar disciplinary matters fall within the original jurisdiction of this court. La. Const. art. V, § 5(B). Consequently, we act as triers of fact and conduct an independent review of the record to determine whether the alleged misconduct has been proven by clear and convincing evidence. *In re: Banks*, 09-1212 (La. 10/2/09), 18 So. 3d 57.

In cases in which the lawyer does not answer the formal charges, the factual allegations of those charges are deemed admitted. Supreme Court Rule XIX, § 11(E)(3). Thus, the ODC bears no additional burden to prove the factual allegations contained in the formal charges after those charges have been deemed admitted. However, the language of § 11(E)(3) does not encompass legal conclusions that flow from the factual allegations. If the legal conclusion the ODC seeks to prove (i.e., a violation of a specific rule) is not readily apparent from the deemed admitted facts, additional evidence may need to be submitted in order to prove the legal conclusions

⁵ The chair of the committee concurred but recommended that respondent be adjudged guilty of the rule violations set forth in the formal charges, to be considered if and when she seeks readmission.

that flow from the admitted factual allegations. *In re: Donnan*, 01-3058 (La. 1/10/03), 838 So. 2d 715.

The record of this deemed admitted matter supports a finding that respondent accepted a fee for legal services while she was ineligible to practice law, failed to return the unearned fee, and failed to cooperate with the ODC in its investigation. This conduct violated the Rules of Professional Conduct as charged.

Having found evidence of professional misconduct, we now turn to a determination of the appropriate sanction for respondent's actions. In determining a sanction, we are mindful that disciplinary proceedings are designed to maintain high standards of conduct, protect the public, preserve the integrity of the profession, and deter future misconduct. *Louisiana State Bar Ass'n v. Reis*, 513 So. 2d 1173 (La. 1987). The discipline to be imposed depends upon the facts of each case and the seriousness of the offenses involved considered in light of any aggravating and mitigating circumstances. *Louisiana State Bar Ass'n v. Whittington*, 459 So. 2d 520 (La. 1984).

Respondent violated duties owed to her client, the public, and the legal profession. Her conduct was knowing, if not intentional, and caused actual and serious harm to the client. The applicable baseline sanction is disbarment. The aggravating factors found by the committee are supported by the record, and no mitigating factors are present.

As previously noted, a majority of the committee believes that the nature and number of the concurrent acts should be considered in determining an appropriate sanction in this matter. We agree. For her misconduct, the committee recommends that respondent's disbarment be extended for an additional five years.

Although respondent is currently disbarred as a result of her misconduct in *Gbaalazeh II*, our jurisprudence permits additional sanctions in the form of an extension of the five-year minimum period which must elapse before a disbarred

lawyer may seek readmission. *See In re: White*, 00-2732 (La. 4/25/01), 791 So. 2d 602 (“[t]herefore, we believe it is more consistent with the purposes of Supreme Court Rule XIX, § 24 to hold that the five-year minimum period for readmission for a subsequent disbarment should run consecutively to the five-year period stemming from the original disbarment, in the absence of unusual or extenuating circumstances”).

Accordingly, we will adopt the hearing committee’s recommendation and extend respondent’s disbarment for an additional five years. We will further order respondent to make full restitution to Souleymane Traore.

DECREE

Upon review of the findings and recommendations of the hearing committee, and considering the record, it is ordered that the minimum period within which Dounnisei Kuo Gbalazeh, Louisiana Bar Roll number 30896, may seek readmission to the practice of law be extended for a period of five years, commencing from the date respondent would be eligible to seek readmission from the disbarment imposed in *In re: Gbalazeh*, 20-1111 (La. 11/24/20), 304 So. 3d 849. It is further ordered that respondent make full restitution to Souleymane Traore. All costs and expenses in the matter are assessed against respondent in accordance with Supreme Court Rule XIX, § 10.1, with legal interest to commence thirty days from the date of finality of this court’s judgment until paid.