

SUPREME COURT OF THE STATE OF NEW YORK, APPELLATE DIVISION,
FIRST DEPARTMENT

Sinckler v. Mohammed

2026 NY Slip Op 00998 · No. Index Nos. 800274/24, 800555/24; Appeal Nos. 5871-5872; Case Nos. 2025-04758, 2025-05029 · Decided February 19, 2026

SUMMARY

The Appellate Division, First Department affirmed orders disqualifying plaintiff's attorney and law firm from representing Geoffrey Sinckler in two property-related actions against Ibrahim Mohammed. The court held that Mohammed established a prior attorney-client relationship with the attorney, substantial relatedness between the representations, and materially adverse interests warranting disqualification.

CASE DETAILS

COURT	Supreme Court of the State of New York, Appellate Division, First Department
WRITING FOR THE COURT	Webber, J.P.; Kapnick, J.; Gesmer, J.; Shulman, J.; Michael, J.
JURISDICTION	New York Supreme Court, Appellate Division, First Department
DECIDED	February 19, 2026
DOCKET	Index Nos. 800274/24, 800555/24; Appeal Nos. 5871-5872; Case Nos. 2025-04758, 2025-05029
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff appealed from two orders of Supreme Court, Bronx County, granting defendant Ibrahim Mohammed's motions to disqualify plaintiff's attorney and law firm. The Appellate Division unanimously affirmed both orders with costs.
STANDARD OF REVIEW	Abuse of discretion; whether Supreme Court providently exercised its discretion in disqualifying counsel.
PRECEDENTIAL VALUE	Published New York Appellate Division opinion
PARTIES	Geoffrey Sinckler v. Ibrahim Mohammed

TOPICS

- civil procedure
- appellate procedure
- real estate
- commercial litigation
- standard of review

PRACTICE AREAS

Legal ethics and professional responsibility

Civil procedure

Real estate litigation

Commercial litigation

Appellate procedure

QUESTIONS PRESENTED

1. Whether Supreme Court properly disqualified Steve Okenwa and the Okenwa Law Firm from representing Sinckler where Okenwa previously represented Mohammed, the matters were substantially related, and the parties' interests were materially adverse.

HOLDINGS

1. The court properly exercised its discretion in disqualifying Steve Okenwa and the Okenwa Law Firm because Mohammed established a prior attorney-client relationship with Okenwa, substantial relatedness between the prior and current representations, and material adversity between Mohammed's and Sinckler's interests.

KEY QUOTATIONS

“Both actions involve defendant's alleged scheme to use his business relationship with plaintiff to defraud plaintiff into transferring his properties to defendant's corporate entities.” ([*1])

“Accordingly, there is a substantial risk that Okenwa may have obtained information about the nature of the parties' business relationship when he represented defendant in connection with the 239 property which could be used against Mohammed in the Fenton Avenue action.” ([*1])

FACTUAL BACKGROUND

Sinckler brought two actions alleging that Mohammed abused their business relationship to induce the transfer of Sinckler's properties to Mohammed's corporate entities. Okenwa had previously represented Mohammed in connection with a Bronx property and had also represented both parties' interests in an earlier action concerning ownership of that same property. The second action concerned an allegedly fraudulently induced transfer of property on Fenton Avenue, which the court found substantially related to Okenwa's prior representation of Mohammed.

PROCEDURAL HISTORY

Geoffrey Sinckler commenced two actions against Ibrahim Mohammed concerning alleged fraudulent conduct involving Sinckler's properties. Supreme Court, Bronx County, entered orders on July 1 and July 9, 2025, disqualifying Steve C. Okenwa and the Okenwa Law Firm from representing Sinckler. Sinckler appealed, and the Appellate Division affirmed both orders.

DISPOSITION

affirmed

CASES CITED

- Tekni-Plex, Inc. v. Meyner & Landis, 89 N.Y.2d 123, 131 (1996)

OPINION

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PER CURIAM.

Sinckler v Mohammed (2026 NY Slip Op 00998) Sinckler v Mohammed 2026 NY Slip Op 00998 Decided on February 19, 2026 Appellate Division, First Department Published by New York State Law Reporting Bureau pursuant to Judiciary Law § 431. This opinion is uncorrected and subject to revision before publication in the Official Reports. Decided and Entered: February 19, 2026 Before: Webber, J.P., Kapnick, Gesmer, Shulman, Michael, JJ. Index No. 800274/24 800555/24|Appeal No. 5871-5872|Case No. 2025-04758 2025-05029| [*1]Geoffrey Sinckler, Plaintiff-Appellant, v Ibrahim Mohammed, Defendant-Respondent, 640 East 239 Holdings LLC, Defendant. Geoffrey Sinckler, Plaintiff-Appellant, v Ibrahim Mohammed, Defendant-Respondent, NY Uptown Group Inc., Defendant. Steve Okenwa, P.C., Brooklyn, (Steve Okenwa of counsel), for appellant. Ibrahim Mohammed, respondent pro se. Order, Supreme Court, Bronx County (Erik L. Gray, J.), entered July 1, 2025, which, to the extent appealed from as limited by the briefs, granted defendant Ibrahim Mohammed's motion to disqualify Steve C. Okenwa, Esq. and the Okenwa Law Firm as counsel, unanimously affirmed, with costs. Order, Supreme Court, Bronx County (Marissa Soto, J.), entered July 9, 2025, which granted defendant Ibrahim Mohammed's motion to disqualify Steve C. Okenwa, Esq. and the Okenwa Law Firm as counsel, unanimously affirmed, with costs. Geoffrey Sinckler brought two actions against Ibrahim Mohammed alleging that Mohammed abused the parties' business relationship to steal Sinckler's properties. We find that the court providently exercised its discretion in disqualifying Sinckler's attorney, Steve Okenwa, Esq., and his law firm, Okenwa Law Firm, in both actions. Defendant established that (1) he had a previous attorney-client relationship with Okenwa in connection with a property on 239th Street in the Bronx (the 239 property), (2) the matters involved in both representations were substantially related, and (3) that his interests and plaintiff's are materially adverse (Tekni-Plex, Inc. v Meyner & Landis , 89 NY2d 123, 131 [1996]). In the first action, which concerns the 239 property, the record demonstrates that Okenwa previously represented both plaintiff's and defendant's interests in a prior action regarding ownership of the exact same property at issue in this lawsuit. The parties do not dispute that plaintiff's interests in this action are adverse to those of defendant. In the second action, which concerns the transfer, allegedly induced by fraud, of a property on Fenton Avenue in the Bronx, defendant established that he and Okenwa had a prior attorney-client relationship, and plaintiff and defendant's interests are materially adverse. The Fenton Avenue action is substantially related to Okenwa's representation of defendant concerning the 239 property so as to warrant Okenwa's disqualification. Both actions involve defendant's alleged scheme to use his business relationship with plaintiff to defraud plaintiff into transferring

his properties to defendant's corporate entities. Accordingly, there is a substantial risk that Okenwa may have obtained information about the nature of the parties' business relationship when he represented defendant in connection with the 239 property which could be used against Mohammed in the Fenton Avenue action. We have considered the parties' remaining arguments and find them unavailing. THIS CONSTITUTES THE DECISION AND ORDER OF THE SUPREME COURT, APPELLATE DIVISION, FIRST DEPARTMENT. ENTERED: February 19, 2026