

SUPPLEMENT TO ARDC COMPLAINT AGAINST ALPHONSE TALARICO, PART 1

TALARICO'S SYSTEM¹ OF DOCUMENT AND INFORMATION SUPPRESSION TO SABOTAGE DULBERG'S CLAIMS AND BENEFIT OPPOSING PARTIES AND DULBERG'S FORMER LAW FIRMS ARE MAPPED AS FOLLOWS:

Talarico's system of document and information suppression to collaborate with opposing counsel and sabotage Dulberg's claims is based on 5 key inactions shown in the following Visual Aid:

[Visual Aid 28 - Talarico system of document and information suppression which intentionally conceals Clinton-Williams system of document and information suppression.png](#)

Talarico was informed of the contents of the folder 'To Julia' and the evidence called 'smoking gun' when he was retained in October, 2020 and was told an amended complaint needed to be filed covering this information which was suppressed by Gooch-Walczyk and Clinton-Williams.

The 5 key inactions of Talarico's system of document and information suppression are:

1) Talarico never filed third amended complaint while collecting large amounts of new evidence. The new evidence is never turned over to opposing counsel or bates-stamped. The client is made to feel they are always preparing new evidence for a new complaint, but somehow the complaint never gets written on time and the evidence is simply hoarded.

The following folder documents how much evidence Talarico had been sent but did not ever present to opposing counsel or in court:²

[Group Exhibit 50 Dulberg-Talarico communication from October, 2020 onward/](#)

This inaction acted to protect Popovich and Mast from the large body of evidence shown in [ARDC Complaint Against Thomas J. Popovich and Hans Mast](#),³ most of which was never presented in court.

2) Talarico knew of fraud on the court and collaboration between opposing counsels in the underlying case 12LA178 but did not report the information to ARDC and never raised the issue in court. Talarico acted in a way that the fraud on the court in 12LA178 would remain hidden.

This inaction acted to protect all attorneys who acted in collaboration with each other.

¹ As complete as is currently mapped. We are learning new aspects of the system daily and will update our documentation as more is learned.

² This folder, though already very large, is still being added to daily as more email print-outs are produced.

³ A version of the same material with hyperlinks to all exhibits can be seen here:
[Evidence of Fraud on the Court in 12LA178 During Popovich-Mast Representation](#)

3) Talarico knew of fraud on the court in 17LA377, knew of Clinton-Williams sophisticated system of document and information suppression and collaboration with opposing counsel Flynn but did not report it to the ARDC and did not raise the issue in court

The following online folder contains a detailed timeline of when Dulberg first became aware of the sophisticated system of document and information suppression Clinton and Williams were using to sabotage Dulberg's case:

[Group Exhibit 49 Dulberg's discovery and efforts to notify Judges of Clinton-Gooch-Popovich fraud on court/](#)

The following Visual Aid helps see groups of key events that took place in the timeline and it helps see the relation of each of these groups to the others:

[Visual Aid 24 - Timeline of discovery and raising issue of fraud during litigation.png](#)

This inaction acted to protect Clinton, Williams, opposing counsel Flynn and the defendants from being discovered in the act of suppressing large numbers of documents and collaborating together to sabotage Dulberg's claims.

4) Talarico also did not act on a civil complaint against Clinton and Williams that his clients wrote and asked Talarico to act upon. Dulberg tried to raise the issue of Clinton-Williams sophisticated system of document and information suppression from October 2022 onward in many ways as [the Timeline in Group Exhibit 49](#) demonstrates.

The speed that complaints were written and filed are compared in the Table 14a below.

TABLE 14a: THE SPEED OF WRITING TWO COMPLAINTS COMPARED

Complaint Client Asked Talarico to Submit	Date	Time it took to write	Author	Result
Baudin complaint	Dec 2022	about 3 weeks ¹	written by client, given to Talarico	submitted
Popovich-Mast 3rd Amended Complaint	Dec 2020 to Nov 2022	over 2 years - never finished ²	Talarico attempted to compose by himself while talking to Dulberg daily by phone	never submitted

¹ The following documents from the [Group Exhibit 50](#) timeline establish when the information was given to Talarico:

[2022-11-11 2 baudin olsen complaint.txt](#)

[2022-11-28 1035 AM RECV Re Baudin AttorneyClient Agreement.pdf](#)

[2022-11-29 1209 PM SENT Re Revised Attorneyclient Agreement pursuant to your instructions with attachments.pdf](#)

[2022-12-07 Gmail - Baudin complaint Deadline, internet down, Signature on my behalf.pdf](#)

[2022-12-08 Gmail - Fwd Baudin complaint Deadline, internet down, Signature on my behalf.pdf](#)

² In the [Group Exhibit 50](#) timeline Talarico is first informed of the need update the complaint here:

[2020-12-14 0926 AM SENT Status of 17LA000377.pdf](#)

Table 14b below lists other Civil Complaints and ARDC Complaints we tried to submit through Talarico, but later came to understand Talarico would not act upon.

TABLE 14b: OTHER COMPLAINTS DULBERG PROVIDED TO TALARICO

Complaint Client Gave to Talarico	Date	Time it took to write	Author	Result
Clinton-Williams Civil Complaint	Dec 2022 ¹	about 3 weeks	written by client, given to Talarico	never submitted
Clinton-Williams ARDC Complaint	Dec 2022 ²	about 3 weeks	written by client, given to Talarico	never submitted
ARDC Complaint Against Edward X. Clinton and Julia C. Williams	July 2023	about 1 month	written by client after growing frustrated with Talarico's delays and after watching Olsen be let out of 22L010905 on May 25, 2022 due to the 2 year SoL expiring	submitted by client through Talarico (because he asked us to do it this way)
ARDC Complaint Against Thomas J. Popovich and Hans Mast	Aug 2023	about 1 month	written by client after growing frustrated with Talarico not presenting the same evidence in court and after watching Olsen be let out of 22L010905 on May 25, 2022 due to the 2 year SoL expiring	submitted by client through Talarico (because he asked us to do it this way)
ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk	Oct 2023	about 1 month	written by client after growing frustrated with Talarico not presenting the same evidence in court and after watching the Baudins be let out of 22L010905 on Aug 29, 2022 due to the 2 year SoL expiring	submitted by client directly (because we were frustrated with Talarico's delays)

1 The following documents from the [Group Exhibit 49](#) timeline establish when the information was given to Talarico:

[2022-11-09 Gmail - Document suppression smoking gun.pdf](#)

[2022-11-09 document suppression smoking gun/](#)

[2022-12-03 Gmail - ARDC complaint against Williams and Flynn underlying facts.pdf](#)

[2022-12-03 Gmail - Documents to release from attorney client privilege.pdf](#)

[2022-12-15 Draft Civil and ARDC Complaint against Williams draft copy.txt](#)

[2023-01-02 Civil and ARDC Complaint against Williams draft.txt](#)

[2023-01-02 Gmail - Williams complaint ready for Alphonse.pdf](#)

2 same as above

Complaint Client Gave to Talarico	Date	Time it took to write	Author	Result
ARDC Complaint Against William Randall Baudin II and Kelly Baudin	Oct 2023	about 1 month	written by client after growing frustrated with Talarico not presenting the same evidence in court and after watching the Baudins be let out of 22L010905 on Aug 29, 2022 due to the 2 year SoL expiring	submitted by client directly (because we were frustrated with Talarico's delays)
ARDC Complaint Against Brad Balke	Oct 2023	about 1 month	written by client after growing frustrated with Talarico not presenting the same evidence in court and after watching the Baudins be let out of 22L010905 on Aug 29, 2022 due to the 2 year SoL expiring	submitted by client directly (because we were frustrated with Talarico's delays)

Talarico (through his various inactions) acted to protect Clinton-Williams from being detected. Talarico also acted to protect opposing counsel Flynn and defendants Popovich and Mast from being detected. Talarico then (through his various inactions) acted to protect the Baudins, Olsen, Allstate, and ADR Systems.

5) Talarico committed acts #1, #2, #3 and #4 as listed before filing the Baudin complaint but Talarico kept the evidence of acts #1, #2, #3 and #4 out of all 22L010905 court records and away from the presiding Judge.

Talarico once again (through his various inactions) acted to protect the Baudins, Olsen, Allstate, and ADR Systems.

[Group Exhibit 50 Dulberg-Talarico communication from October, 2020 onward/](#)

THE **COMPLETE SYSTEM**¹ OF DOCUMENT AND INFORMATION SUPPRESSION USED TO SABOTAGE DULBERG'S LEGAL MALPRACTICE CLAIMS IN ILLINOIS CIRCUIT COURTS IS MAPPED AS FOLLOWS:

The integrated and sophisticated system all of Dulberg's legal malpractice attorneys used to sabotage Dulberg's claims and benefit the defendants and opposing counsel can be modelled as shown in this Visual Aid:

[Visual Aid 29 - Integrated system of legal malpractice document and information suppression in Illinois.png](#)

¹ As complete as is currently mapped. We are learning new aspects of the system daily and will update our documentation as more is learned.

The complete integrated system of document and information suppression used against Dulberg by a network of legal malpractice attorneys in Illinois is a highly complex, layered and sophisticated system which has the following characteristics:

- It is a layered system that becomes increasingly more complex with every layer.
- The outer layers intentionally try to conceal fraud that what happened in the inner layers.
- Steps 1, 2, 3 (and beyond) effectively act as a single, integrated system wherein the victim ‘digs their own grave’ and loses more and more money in a process they can never hope to win. But the victim does not know they are being made to ‘dig their own grave’ (and pay for it, too).
- The topmost layer will use their ‘cover story’ and their legal malpractice insurance to protect all other members of the Illinois Bar in the inner circles.
- It resembles a type of ‘honor system’ where the most recent law firm “falls on their sword” if necessary to protect all the other members of the Illinois Bar. But why it would be considered ‘honorable’ to effectively ‘gang-rape’ a permanently disabled U.S. citizen and Illinois resident somehow goes unexamined.
- It is a system of fraudulent concealment of fraudulent concealment, over and over, until the victim’s claims against members of the Illinois Bar are destroyed. Layer by layer, fraud by fraud, the victim is attacked until the protected network of Illinois attorneys escape all consequences for their collective acts of fraud, fraudulent concealment, fraud on the court, and violations of the Himmel Rule.
- The more the victim resists, the deeper the hole becomes.

Based on the integrated system of document and information suppression in [Visual Aid 29](#), the only accurate and detailed mapping of the integrated system of document and information suppression experienced by Dulberg to sabotage his legal malpractice claims must include:

The system of document and information suppression and fabrication used by Gooch-Walzyk mapped here: [ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk](#)

followed by and combined with

The system of document and information suppression used by Clinton-Williams mapped here: [ARDC Complaint Against Edward X. Clinton and Julia C. Williams](#)

followed by and combined with

The system of document and information suppression used by Talarico mapped here: [ARDC Complaint Against Alphonse Talarico Part 1](#)

Only the 3 systems of document and information suppression happening one after the other and

taken as a single integrated system can represent what Dulberg experienced in an accurate way. Two important facts become apparent:

- This demonstrates the high level of complexity in the multi-layered system used to fraudulantly conceal collective attorney-on-client fraud and protect an offending network of Illinois attorneys.
- The high level of complexity also shows that the average victim of such an integrated and prolonged attack can never realistically hope to defend themselves (or even figure out what is happening to them) as their world crumbles around them due to events they were never intended to understand or protect themselves and their families against.

The system works by attacking the targeted victim through their own attorney. This is one of the most characteristic ‘trade-marks’ of the integrated system as shown in [Visual Aid 29](#).

The system as shown operates by ‘choking’ the client through using the filed complaints as the key ‘choke points’. The Dulberg examples show to what extreme a degree the client can be ‘choked’. This can be seen by simply comparing the contents of the filed complaints (listed in Table 14c below) with [the contents of the 10 ARDC complaints we’ve submitted](#) to date.

TABLE 14c: ONLY COMPLAINTS SUBMITTED ON DULBERG’S BEHALF IN 17LA377

Complaints filed in 17LA377	Author	Date	System of document and information suppression used
Complaint at Law	Gooch-Walczyk	11-28-2017	Described in detail in ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk
First Amended Complaint	Gooch-Walczyk	6-7-2018	Described in detail in ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk
Second Amended Complaint	Clinton-Williams	12-6-2018	Described in detail in ARDC Complaint Against Edward X. Clinton and Julia C. Williams

The three complaints in Table 14c demonstrate how a client is ‘choked’ into appearing to make an extremely limited number of (contradictory and ineffectual) accusations against defendants who are actively being protected by a network of Illinois legal malpractice attorneys. Talarico was retained in October, 2020 largely for the purpose of updating the complaints listed in Table 14c above yet Talarico never filed any complaint with updated accusations. Talarico became aware of evidence of fraud on the court in underlying case 12LA178 yet again took no action. Talarico was then shown a detailed description of how Clinton-Williams used a sophisticated system of document and information suppression and collaborated with opposing counsel to sabotage Dulberg’s claims in case 17LA377. Talarico again took no action. Instead, Talarico left the complaints listed in Table 14c above to represent Dulberg’s claims against Popovich and Mast. This resulted Dulberg losing a Summary Judgment motion to opposing counsel in the Circuit Court based on the 2 year statute of limitations expiring. Talarico then failed to write a timely

appellant brief and failed to file a timely and acceptable petition to the Illinois Supreme Court before Talarico abruptly withdrew on January 14, 2024 stating, “I will report your actions to my malpractice insurance carrier”.

We believe the overall process described by this integrated set of mappings is truly sickening in that we have lived it for more than a decade and we know that the average (Illinois resident) victim ***will never be able to defend themselves*** from becoming a mere food source for a predatory network of Illinois attorneys who use these and similar systems of fraud.

THE SYSTEM OF FRAUDULANT CONCEALMENT USED AGAINST DULBERG BY A NETWORK OF ILLINOIS ATTORNEYS MAPPED IN TABLES

The basic techniques Talarico used are similar to the techniques that all 9 attorneys used before him. It is part of a ***system of fraudulent concealment*** used against Dulberg which is mapped in [Fraud Chart by attorney](#) and [Fraud Chart by case](#).

Talarico’s ways of using the methods listed at the top of both tables linked above are as follows:

1, 2, 3) ‘Bury key evidence’, ‘Bury fraud’, ‘Bury troublesome issues’ what Talarico buried:

- a) All evidence hoarded but never used.
- b) Evidence of fraud on the court and collaboration between opposing attorneys to sabotage Dulberg’s case in 12LA178.
- c) Evidence of sophisticated system of document and information suppression by Clinton-Williams and collaboration with opposing counsel to sabotage Dulberg’s case in 17LA377.

4) ‘Set up 2 year SoL escape hatch’ for defendants

How it was done can be seen in both [Visual Aid 24](#) and [Visual Aid 28](#). All 3 listed items of ‘buried key evidence’ (a, b, and c listed above) needed to be ‘buried’ for the defendants to use a 2 year SoL ‘escape hatch’.

How Talarico suppressed many acts of fraudulent concealment from before 22L010905 was filed throughout the entire proceedings to benefit opposing counsel can be seen by comparing [Group Exhibit 43 22L010905 Common Law Record and Reports of Proceedings](#) with the contents of the following three tables:

[BEFORE THE BAUDINS: Popovich-Mast, Allstate, Barch, Balke collaborative fraudulent concealment table](#)

[WITH THE BAUDINS: Allstate, Olsen collaborative fraudulent concealment table](#)

[AFTER THE BAUDINS: Gooch-Walczyk and Clinton-Williams and Talarico collaborative fraudulent concealment table](#)

The Tables reveal a system of fraud and fraudulent concealment. Talarico set up a 2 year SoL 'escape hatch' for Olsen and the Baudin defendants by doing the following:

- a) by ignoring information in the Table '[BEFORE THE BAUDINS](#)'
- b) by suppressing the sophisticated system of Clinton-Williams document and information suppression and collaboration with opposing counsel in the Table '[AFTER THE BAUDINS](#)'
- c) by not including certain acts in the table '[WITH THE BAUDINS](#)'

Talarico's system of document and information suppression works by using 5 key (in)actions listed in [Visual Aid 28](#):

- 1) Talarico never filed an amended complaint while collecting large amounts of new evidence.
- 2) Talarico knew of fraud on the court and collaboration between opposing counsels in 12LA178 but did not report to ARDC and never raised the issue in court.
- 3) Talarico knew of fraud on the court in 17LA377, knew of the Clinton-Williams sophisticated system of document and information suppression and collaboration with opposing counsel but did not report it to the ARDC and did not raise the issue in court

This is how Talarico could set up a 2 year 'escape hatch' for defendants Mast, Popovich, the Baudins and Olsen:

- #1 and #2 (listed above) taken together allowed Talarico to ignore information in the Table '[BEFORE THE BAUDINS](#)'
- #3 (listed above) allowed Talarico to ignore information in the Table '[AFTER THE BAUDINS](#)'

Talarico was part of the system of fraudulent concealment: Essentially fraudulantly concealing the fraudulent concealment. Talarico concealed information in the Table '[AFTER THE BAUDINS](#)' and '[BEFORE THE BAUDINS](#)' to benefit the defendants and allow the 2 year Sol 'escape hatch' to be used.

5) to 12) 'Choke client'

Talarico's system for 'choking' Dulberg was through never filing an amended complaint but always acting as if he is preparing one. In this way all the information gathered and ready to present was never used. The evidence was simply hoarded by Talarico.

This is the main reason that the evidence in the [ARDC Complaint Against Thomas J. Popovich and Hans Mast](#) is completely different than the information stated in Dulberg's Complaint, Amended Complaint, and Second Amended Complaint (as shown in Table 14c). This is the effect of Dulberg being 'choked'. [The 10 ARDC complaints we have submitted](#) to date contains a large body of evidence that Talarico never presented in any court.

As shown in Table 14b, we grew frustrated by Talarico not using this large body of evidence in court and we wrote our own ARDC Complaints which included this large body of evidence and we eventually submitted complaints to the ARDC ourselves.

13) 'Run for cover stories'

Talarico's 'cover stories' are compared with the Gooch method of inventing an 'alibi' and the Clinton-Williams use of an 'artificial crisis' beginning on page 11 of [ARDC Complaint Against Alphonse Talarico, Part 1](#).

In the large body of emails in the folder¹ linked below there is only a single one which Talarico could use as an 'alibi' for blaming Dulberg for 'offensive behavior'. The conditions under which Dulberg wrote that single email are described in [ARDC Complaint Against Alphonse Talarico, Part 1](#), on page 12. Yet this appears to be a 'cover story' which Talarico is preparing to use for why he resigned:²

[Group Exhibit 50 Dulberg-Talarico communication from October, 2020 onward/](#)

Talarico filed 2 motions to withdraw as counsel recently. The motion to withdraw documents Talarico sent to Dulberg are in this folder:

[Group Exhibit 53 Talarico Motion to Withdraw documents/](#)

In the motion to withdraw documents Talarico makes the following claims:

- 1) Irreconcilable differences regarding the preparation of this matter for hearings have arisen between this attorney and his clients herein;
- 2) There exists and has existed for some time a lack of communication and meaningful communication between this attorney and his clients herein;
- 3) The clients have not afforded this attorney herein adequate cooperation necessary to properly prepare the cause of the client and a difference of opinion appears to exist between clients and attorney as to the conduct of this matter;
- 4) That the clients were given notice of this Motion electronically at three email addresses that have been used by the clients for over two years and in accordance with Illinois Supreme Court Rule 13(c)(2);

1 This folder, though already very large, is still being added to daily as more email print-outs are produced.

2 This folder, though already very large, is still being added to daily as more email print-outs are produced.

- 5) Pursuant to the Rules of Professional Conduct 1.16(a)(1) the clients have insisted upon a course of unprofessional conduct that the attorney cannot comply with;
- 6) Pursuant to the Rules of Professional Conduct 1.16(b)(2) the clients have persisted in a course of action involving the lawyer's services that the lawyer reasonably believes is fraudulent;
- 7) Pursuant to the Rules of Professional Conduct 1.16 (b)(5) the client failed substantially to fulfill an obligation to the lawyer regarding the lawyer's services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled;
- 8) pursuant to the Rules of Professional Conduct 1.16 (b)(6) the representation will result in an unreasonable financial burden on the lawyer

These points, in Talarico's own words, summarize how Talarico is 'running for cover story' in a nutshell. Talarico appears to be blaming Dulberg for:

- a) poor communication, lack of meaningful communication (Talarico's items 1, 2, 3)
- b) fraudulent behavior (Talarico's item 6)
- c) asking Talarico to act unprofessionally (Talarico's item 5)
- d) Breach of financial obligation (Talarico's item 7, 8)

All communication between Dulberg and Talarico is contained in the following folder:¹

[Group Exhibit 50 Dulberg-Talarico communication from October, 2020 onward/](#)

Our record of communication with all attorneys against whom we have filed ARDC Complaints to date (which is available online) shows that we are courteous, respectful, financially responsible and rational clients, even while we are being attacked unjustly by 6 successive Illinois law firms.

The only evidence of fraud in the communication in [Group Exhibit 50](#) is that of Talarico suppressing the evidence contained in the 10 ARDC complaints we have submitted to date from all Illinois court records and of Talarico violating the Himmel Rule.

Dulberg has made public all attorney-client communication with all attorneys included in [the 10 ARDC complaints we have submitted](#) to date. In truth, Dulberg has never had anything called 'attorney-client privilege'. Dulberg has not had any attorney listed in [the 10 ARDC complaints submitted](#) to date who has not been collaborating with or helping opposing counsel. Dulberg basically had a series of 'moles' or 'spies' as attorneys. If Dulberg or Thomas Kost engaged in fraud, it would be easy for any of the 'moles' or 'spies' who acted as Dulberg's attorneys to point it out. Since all our evidence and attorney-client communications are online, any online viewer with sufficient skills should be able to detect the fraud that Dulberg or Thomas Kost committed if any such acts of fraud existed.

¹ This folder, though already very large, is still being added to daily as more email print-outs are produced.

As for breach of financial obligation, the email record in [Group Exhibit 50](#) contains proof that Talarico abruptly resigned on January 14, 2024 after being asked whether he was in violation of the Himmel Rule. Talarico has his \$15,000 retainer paid in advance on the 15th of every month. Email records show that Talarico was attempting to invent a 'cover story' to blame Dulberg for some breach of financial obligation that did not exist. The motion to withdraw documents demonstrate that Talarico is continuing to 'run' with the same 'cover story'.

These accusations against Dulberg and Thomas Kost represent a new ethical low point for an attorney 'running for cover stories' while collaborating in this network. In fact, to this moment Thomas Kost was not accused of anything. But now not only Dulberg but Thomas Kost is also accused of participating in fraud by Talarico.

According to the logic of the complete system of document and information suppression, not just Dulberg but other injured and permanently disabled people who resist the fraud being done to them can be expected to face similar accusations by an attorney 'running for cover stories'.

- First and foremost, the permanently disabled person will be accused of engaging in fraudulent behavior themselves. They will be accused of 'faking' their injuries or handicaps or encouraging their attorney to lie for them.
- Secondly, they will be blamed for poor communication, legal ignorance and 'stubbornness'.
- Third, they will be accused of costing the attorney time and money.

For a permanently disabled Illinois resident to have to live through experiences as described in [the 10 ARDC Complaints we have submitted](#) to date, and then be accused by the most recent of the attorneys of fraud is yet another reason why we stated earlier:

We believe the overall process described by this integrated set of mappings is truly sickening in that we have lived it for more than a decade and we know that the average (Illinois resident) victim ***will never be able to defend themselves*** from becoming a mere food source for a predatory network of Illinois attorneys who use these and similar systems of fraud.

These latest accusations by Talarico provide a detailed example of how the network of collaborating attorneys protects itself. **The system works by attacking the targeted victim through their own attorney.** The injured or permanently disabled victim, in most all cases, most probably has no chance to defend themselves.

HOW TALARICO SET UP HIS PERMANENTLY DISABLED CLIENT TO BE SUED AND/OR SANCTIONED FOR BRINGING A FRIVOLOUS ACTION AGAINST ADR SYSTEMS

Talarico knew of and failed to amend and correct his untrue statements made during the Allstate hearing on summary judgment. This failure resulted in a final and appealable decision by Judge Otto which did not address the previous court's order allowing an Amended Complaint against ADR Systems defendant before filing the appeal. Talarico failed to file an Amended Complaint against ADR Systems. Talarico's failed to correct his statement to Judge Otto. These failures resulted in the final and appealable decision in Allstate Summary Judgment ruling and the current pending ARD Systems motion for sanctions.

How Talarico set Dulberg up to be sanctioned by ADR Systems can be seen in detail in the sequence of events documented in the following folder:

[Group Exhibit 43 22L010905 files received through attorney/](#)

As the 'hoax' described above demonstrates, any victim who does not passively accept their fate could be set up and sued by offending attorneys for years to come in retaliation for ever resisting the vicious attack in the first place. After all, once the pattern of consistently blaming Dulberg is established as shown in the column labeled '13' in [Fraud Chart by attorney](#) and [Fraud Chart by case](#) and once Talarico joins in the accusations made by the network of attorneys against Dulberg, why would the network of attorneys stop when the legal malpractice claims against them are dropped? They could then continue to blame Dulberg in more and more ways while suing Dulberg repeatedly (as a collaborating network) for more and more made-up offenses.

SETTING UP ONES PERMANENTLY DISABLED CLIENT IN THE APPEAL PROCESSES TO SABOTAGE THE CLIENT'S APPEAL CLAIMS AND FINISH THEM OFF FOR GOOD

The techniques of sabotage mapped and documented in [the 10 ARDC Complaints we have already submitted](#) are all for naught if the offending attorneys cannot sabotage the appeal process also. This is necessary for the 'final death' of the client's case. Therefore it is during an appeal (in the Appellate Court or in the Supreme Court) where the targeted victim has to have their 'throat cut' one final time and be 'left to bleed out completely' to achieve this 'final death' of the case.

In fact, considering the mappings of sabotage in Illinois Circuit Courts that have already been documented in [the 10 ARDC Complaints we have already submitted](#) to date, it is only logical to expect to encounter complex methods of sabotaging any appeal claims that a targeted victim could attempt to make.

For these reasons the basic techniques #1 to #13 shown in the [Fraud Chart by attorney](#) and [Fraud Chart by case](#) require an accompanying set of techniques to 'finish the job' during any appeal process.

Talarico would play a central role in any expected attempt to sabotage the appeal processes of Dulberg. One example is how Dulberg's appeal of 17LA377 was denied "for failure to file a brief" during Talarico's representation as shown in the timeline of appeal events in this folder:

[Group Exhibit 45 17LA377 appeal/](#)

The following Visual Aid helps see how key events unfolded in the timeline:

[Visual Aid 27 - How Dulberg's appeal was denied for failure to write a brief.png](#)

Note that in the timeline in [Group Exhibit 45](#) Talarico gave Dulberg the following 2 documents on October 17, 2023:

[2023-10-17 Research ISCR 323\(a\) Print.pdf](#)

[2023-10-17 Research Recusal Print.pdf](#)

The documents are Westlaw printouts of many appellate decisions in which cases were dismissed due to the plaintiff providing an insufficient record of the subject under appeal. One of the reasons consistently given in the appellate rulings is that the Plaintiff did not provide a record on how the Circuit Court Judge ruled which was sufficiently detailed enough for the Appellate Court to make a decision to overrule the decision of the Circuit Court Judge.

Talarico acted against Dulberg's explicit instruction to have a court reporter present at all court dates. This resulted in no official record of what was said or the reasoning behind the decision made during the Baudins defendants hearing (on August 29, 2022) resulting in Summary judgment. Talarico did the same thing on December 4, 2023 in a TIF case (2023 CH 04351) for Thomas Kost. After the TIF case decision of the Judge to dismiss Kost's claim, Talarico called Kost by telephone and told Kost that Talarico did not have a court reporter present during the decision because he said, "I didn't think we would lose". This makes no sense since Talarico was instructed to have a court reporter present at all court events without exception.

In [ARDC Complaint Against Alphonse Talarico, Part 1](#) the events leading up to and during the writing of Dulberg's Supreme Court Petition were described in detail. The events described, taken together with the events described in this document, show how Talarico has made consistent efforts to sabotage Dulbergs attempts to appeal the Circuit Court decisions in 17LA377 and 22L010905 (which is necessary for the 'final death' of Dulberg's cases which Talarico appears intent on achieving).

This will be examined in another supplement or a 'Part 2' which we expect to submit once we receive our case file from Talarico.