SECOND SUPPLEMENT TO ARDC COMPLAINT AGAINST ALPHONSE TALARICO, PART 1

This document is being added to the original <u>ARDC Complaint Against Alphonse Talarico</u>, <u>Part 1</u> (ARDC #6184530) to provide a precise timeline of when evidence of collaboration between Talarico and opposing counsel Flynn first appeared.

Timeline of when Talarico first began to collaborate with the SYSTEM OF FRAUD and suppress documents and information to help the SYSTEM OF FRAUD target Dulberg is contained in the following folder:

<u>Group Exhibit 51 Timeline of first discovery of Meyer Recusal, forgery, fraud on court,</u> collaboration with OC, other and Talarico burial of the same/

A Visual Aid that helps see what is happening in the timeline folder:

<u>Visual Aid 26 - Timeline of first discovery of Meyer Recusal, forgery, fraud on court, collaboration with OC, other and Talarico burial of the same.png</u>

The 2 red lines mark 2 points in time when Talarico began to act in ways which benefitted opposing counsel and Dulberg's former attorneys

The upper red line marks July 11, 2022. This is the first day in which evidence unmistakably emerges that Talarico was acting to sabotage Dulberg's claims and when Talarico first acted to suppress documents and information which were gathered and given to Talarico along the blue line.

The lower red line marks Talarico's moves to suppress the large body of evidence Talarico was given from around October 24, 2022 to November 9, 2022 (marked in green).

A body of evidence emerged along the blue line. Later a new body of evidence emerged along the green line. The red lines show Talarico's efforts to suppress both bodies of evidence. Talarico first begins to block the evidence gathered along the blue line on July 11, 2022. Talarico first moved to block the evidence gathered in the green box in late October, 2022 but certainly by November 9, 2022. According to the evidence in the timeline Talarico had been working for the benefit of opposing counsel Flynn, defendants Mast and Popovich and all of Dulberg's former attorneys for at least 5 months BEFORE Talarico filed complaint 22L010905 on December 8, 2022.

Sequence of events:

2022-03-26 Subpoena for signatures Erickson and Orton

2022-05-24 Omni reports on forgeries are finalized and published

2022-07-06 first day Talarico decides on plan to have the Mast deposition stricken from the record

2022-07-11 F1 discoveries are closed. Talarico deflects attention away from forgeries and toward Mast deposition

2022-08-02 subpoenas for Clinton-Williams on Mast deposition

2022-09-16 Flynn files MTD

2022-12-08 Talarico was effectively acting as a 'spy' or 'mole' when he filed complaint 22L010905 against the Baudins, Olsen, Allstate and ADR Systems.

2023-02-01_Popovich and Mast are let out of 17LA377

The forgeries were never raised as an issue but were known since 2022-05-24

The Clinton-Williams sophisticated system of document and information suppression and collaboration with opposing ounsel Flynn was never raised as an issue but was known since at least November 9, 2022

One can see how Talarico did this by watching how Talarico suppressed evidence of forgery and collaboration between opposing counsels in 12LA178 as the evidence was discovered along the blue line as of July 11, 2022.

Talarico then suppressed evidence of a sophisticated system of document and information suppression and collaboration between opposing counsels in 17LA377 as of November 9, 2022.

Therefore by November 9, 2022 Talarico was actively suppressing evidence of fraud on the court and collaboration between opposing counsels in 12LA178 and evidence of fraud on the court and collaboration between opposing counsels in 17LA377. Both of these acts of suppression were ongoing for at least 1 month BEFORE Talarico filed complaint 22L010905 against other defendants involved with 12LA178.

Talarico was also retained on April 30, 2022 by Thomas Kost to file case 2023 CH 04351 involving property placed in a TIF district against the wishes of the homeowner and involving altered documents. Talarico filed complaint 2023 CH 04351 on May 2, 2023. Both of these acts of suppression were ongoing for at least 6 month BEFORE Talarico filed complaint for 2023 CH 04351 in the TIF case.

Knowing when these 2 bodies of evidence were first discovered (in blue and green) and first suppressed (at the latest by the 2 red lines) helps see the true timeline of how each defendant was let out of their respective cases by using 2 year SoL 'escape hatches' originally set up by

Gooch-Walczyk and Clinton-Williams but finally acomplished through Talarico's own system of document and information suppression as seen in this Visual Aid:

Visual Aid 24 - Timeline of discovery and raising issue of fraud during litigation.png

Visual Aid 24 shows when the information of the Clinton-Williams sophisticated system of document and information suppression first emerged and collaboration with opposing counsel Flynn. Visual Aid 24 does not show the earlier suppression of evidence from July 11, 2022 which is shown in Visual Aid 26 and happened earlier. As shown in Visual Aid 24, Popovich and Mast were dismissed from the case on February 1, 2023 using a 2 year SoL 'escape hatch' while Talario was in possession of forgeries made by Popovich-Mast and involving opposing attorneys Barch and Accardo since around May 24, 2022.

What Talarico was doing is easy to see by simply paying attention to what happened to the proofs of forgery from May 24, 2022 onward and how these proofs of forgery were not raised by Talarico throughout case 22L010905. It is also easy to see what Talarico was doing by watching what happened to key evidence in 12LA178 (Walgreens RX pharmacy receipts with timestamps that were destroyed by Popovich-Mast). They were given to Talarico but Talarico never raised the issue.

Likewise it is easy to see what Talarico was doing as Talarico was given detailed evidence of document suppression and collaboration with opposing counsel in 17LA377 as early as October, 2022 but never raised the issue as Popovich and Mast are dismissed from the case using a 2 year SoL 'escape hatch' and never raised the issue througout case 22L010905.