

ARDC COMPLAINT AGAINST GEORGE FLYNN, RONALD BARCH, PARRY ACCARDO, SHOSHAN REDDINGTON

We have submitted 10 ARDC Complaints to date:

Edward X. Clinton No. 2023IN02517 (submitted on July 27, 2023)
Julia C. Williams No. 2023IN02518 (submitted on July 27, 2023)
Thomas J. Popovich No. 2023IN03135 (submitted on September 15, 2023)
Hans Mast No. 2023IN03136 (submitted on September 15, 2023)
Brad J. Balke No. 2023IN03894-R (submitted on November 8, 2023)
Kelly Baudin No. 2023IN03898-R (submitted on November 8, 2023)
William Randall Baudin II No. 2023IN03897-R (submitted on November 8, 2023)
Thomas W. Gooch No. 2023IN03895-R (submitted on November 8, 2023)
Sabina Walczyk-Sershon No. 2023IN03896-R (submitted on November 8, 2023)
Alphonse Talarico (submitted on January 22, 2024)

We've also produced the following documents which describe basically the same things as the ARDC complaints and have full hyperlink features to all exhibits:

[Evidence of Fraud on the Court in 12LA178 During Popovich-Mast Representation](#)
[Evidence of Fraud on the Court in 12LA178 During Balke Representation](#)
[Evidence of Fraud on the Court in 12LA178 During Baudins Representation](#)
[Evidence of Fraud on the Court in 17LA377 During Gooch-Walczyk Representation](#)
[Evidence of Fraud on the Court in 17LA377 During Clinton-Williams Representation](#)
[Evidence of Fraud on the Court in 17LA377 During Talaricon Representation, Part 1](#)
[Evidence of a System of Fraud Helped by Talarico Which Targets Dulberg](#)
[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](#)

All documents linked above have exhibits placed in a [shared single folder](#).

TABLE 15: LIST OF OPPOSING COUNSEL WHO COLLABORATED WITH DULBERG'S RETAINED ATTORNEYS TO SABOTAGE DULBERG'S CLAIMS

Dulberg's retained attorney		Opposing counsel
Popovich-Mast	collaborated with	Barch, Accardo
Balke	collaborated with	Accardo
Baudins	collaborated with	Reddington
Gooch-Walczyk Clinton-Williams Talarico	collaborated with	Flynn

BARCH AND ACCARDO

Forged depositions are a collaborative work of Popovich-Mast and Barch and Accardo. Barch, Accardo and Popovich and Mast are all responsible for the forged depositions.

Allstate attorney Accardo never had Gagnon answer the interrogatories that were sent by attorneys Mast and Popovich on October 3, 2012. Popovich and Mast never demanded that Allstate answer any interrogatory questions. There is no evidence the interrogatory questions from Dulberg to Gagnon were ever sent to opposing counsel. It is not possible that Allstate did not know that Gagnon's interrogatory questions were never answered.

Allstate attorney Accardo never filed an answer to the CROSS-CLAIM accusing Gagnon of negligence in Dulberg's injury. None of the 3 law firms claiming to represent Dulberg pointed this out to Dulberg or acted on it. They all knew Gagnon effectively admitted to negligence against Dulberg as of early March, 2013. (Exhibit 19) It is not possible that Allstate attorney Accardo did not know that Allstate never filed an answer to the CROSS-CLAIM. It is not possible that Allstate did not know that their own client Gagnon effectively admitted negligence for Dulberg's injury as of early March, 2013.

In addition, [Gagnon's deposition Exhibit 1](#) appears to be 2 papers spliced together to look like one paper.

On May 30, 2019 the Popovich document disclosure consisted of 1450 pages. The documents released by Popovich have a number of issues that are marked up in 'Group Folder 31'.¹ Among the issues are:

- a. Most depositions that do exist are dated 2019.
- b. There are no Doctor's depositions or any exhibit from any Doctor's deposition among Popovich bates numbered documents. Note that there is not a single Popovich bates-numbered document in any of the following folders:

[Group Exhibit 26 2013-10-01_Dr Levin depositions](#)

[Group Exhibit 27 2013-10-15_Dr Sagerman depositions](#)

[Group Exhibit 28 2013-10-16_Dr Talerico depositions](#)

[Group Exhibit 29 2013-11-20_Dr Ford depositions](#)

[Group Exhibit 30 2014-07-23_Dr Kujawa depositions](#)

Dulberg showed the depositions purportedly created by VAHL REPORTING SERVICE, LTD. to his current attorney Alphonse Talarico and was told they are not usable in court because they are not signed.

Dulberg tried several times over a 4 week period to contact the court reporting agency VAHL REPORTING SERVICE, LTD. to obtain legally sufficient certification pages of the 5 doctors depositions that have signatures of the court reporters but nobody called back and all emails were

¹ [Group Exhibit 31](#), (entire contents)

returned as undeliverable.¹

On March 25 and 26, 2022 Dulberg's counsel sent subpoenas for signatures to Margaret Orton and Paula Erickson.

Around March 26, 2022 Dulberg talked with Michael Urbanski. Urbanski told Dulberg that he would contact Vahl Reporting.

On March 26, 2022 Michael Urbanski emailed Dulberg with the subject: "Vahl Reporting" stating:²

"Mr. Dulberg:

I did forward all the information to Carrie Vahl. She now has your email address and I would hope would respond to your requests.

Sincerely,
Michael Urbanski"

On March 28, 2022 at 7:44 AM a person going by the name of Carrie Vahl emailed Dulberg with the subject "Transcripts" stating:³

"Hi,

I spoke with Michael Urbanaki, and he gave me your email.

Michael gave me a list of transcripts that you need certifications for. Can you give me a call on my cell today or tomorrow, (847) 727-5828. Most of today I'll be in a hearing but I'll call you back.

Thanks,
Carrie

--

Carrie Vahl
Vahl Reporting Service, LLC
(847) 727-5828"

On March 28, 2022 at 10:01 AM Dulberg replied stating:⁴

"Dear Carrie Vahl,

Thank you for reaching out to me.

I am not sure what is on the list Mr. Urbanski sent to you so below is a list of Dr's depositions I purchased around 9/15//2015 from Vahl Reporting.

I paid \$723.50 for the depositions with Check #2486 from Account #2600005536.

1 [Group Exhibit 10: 2022-03-22_1023 AM_RECV_Undelivered Mail Returned to Sender.pdf](#)

2 [Group Exhibit 10: 2022-03-26_1010 AM_RECV_Vahl Reporting.pdf](#)

3 [Group Exhibit 10: 2022-03-28_0744 AM_RECV_Transcripts.pdf](#)

4 [Group Exhibit 10: 2022-03-28_1001 AM_SENT_Re Transcripts.pdf](#)

The issue I have with the depositions I received back in 2015 is that none of them were certified or signed by the CSR and they do not have the exhibits attached which means after all this time they are unusable in court.

I would really appreciate a PDF of the signed, certified depositions with the exhibits listed below:

22nd Judicial Circuit, McHenry County case number 12LA178

Dr. KAREN LEVIN, 10/1/2013, ANGELA M. INGHA, CSR , Certificate No. 084-002984

DR. SCOTT SAGERMAN, 10/15/2013, JILL S TIFFANY, CSR, Certificate No. 084-002807

Dr. MARCUS G. TALERICO, 10/28/2013, TERRI A. CLARK, CSR, Certificate No. 084-001957

Dr. APIWAT FORD, 11/20/2013, MARGRET MAGGIE ORTON, CSR, Certificate No. 84-004046

Dr. KATHY KUJAWA, 7/23/2014, JILL S TIFFANY, CSR, Certificate No. 084-002807

Please advise the best way I may obtain the certified, signed Dr's depositions listed above with the exhibit attached.

Thank you in advance for your help with this matter,
Paul"

On March 28, 2022 at 11:29 AM a person going by the name of Carrie Vahl responded stating:¹

"Hi Paul,

Thanks for the list and the info. I never bothered to look up under your name. I was just searching for Popovich's people.

Tomorrow I can scan and email the signature pages to you for each transcript. I'm just out of the office today.

Regarding the exhibits, the defense counsel we were hired by those days never give us the exhibits. So that I can't help you with.

They might be in the original trial file with the clerk's office.

I have one more question. Maggie Orton received a records subpoena. She took a screenshot and it's attached. We don't know what you are looking for with the Twenty signatures. Is it just the cert page signature and then she's in compliance?

Let me know.

Thanks,
Carrie"

There was no attachment to the email and Dulberg did not respond.

¹ [Group Exhibit 10: 2022-03-28_1129 AM_RECV_Re Transcripts.pdf](#)

On March 28, 2022 at 13:39 PM a person going by the name of Carrie Vahl sent Dulberg another email stating:¹

“Hi Paul,

Please find attached the 5 certificate pages with the reporters’ signatures.

Does this satisfy what you need from Maggie Orton? All she has, like the rest of us, is the transcript that you already have.

Thanks,
Carrie”

This email implied the individual signed certification pages from 5 different depositions all grouped into one document on their own and detached from the rest of the depositions they purportedly belong with were legally sufficient. Dulberg did not respond.

On March 31, 2022 at 9:20 AM a person going by the name of Carrie Vahl sent Dulberg a final email stating:²

“Hi Paul,

Did you received this email with the cert pages?

Can you please let me know about the subpoena for Maggie Orton? Does her cert page satisfy what you need?

We want to be in compliance with a subpoena.

I did leave a voicemail for your attorney also but have not heard back. I don’t have his email. Could you send that to me, please?

Thanks,
Carrie”

Dulberg did not respond.

Dulberg felt these could be forgeries or something else could be wrong. Dulberg forwarded the attached documents to his attorney. Talarico suppressed information about forgeries ever since as explained in the following documents already provided to the ARDC:

[2024-01-22_ARDC Complaint_ALPHONSE TALARICO Part 1.pdf](#)

[2024-02-01_Supplement to ARDC Complaint_ALPHONSE TALARICO Part 1.pdf](#)

[2024-02-13_Second Supplement to ARDC Complaint Against Alphonse Talarico, Part 1.pdf](#)

[The certification page of the Gagnon deposition.](#) The certification page of the deposition of Gagnon names Margaret Maggie Orton as the court reporter.³ On March 25, 2022 Margaret Maggie Orton was subpoenaed for 20 signatures.⁴ On May 24, 2022 Omni Document

1 [Group Exhibit 10: 2022-03-28_1339 PM_RECV_Re Transcripts.pdf](#)

2 [Group Exhibit 10: 2022-03-31_0920 AM_RECV_Re Transcripts.pdf](#)

3 [Fabrication 4 Gagnon deposition certification page](#)

4 [Group Exhibit 5_2022-03-25_Margaret Orton subpoena](#)

Examination concluded an expert analysis of the Orton signatures.¹

[The certification pages of the McGuire and McArtor depositions.](#) The certification pages of the William McGuire, Carolyn McGuire and Mike McArtor depositions names Paula Ann Erickson as the court reporter.² On March 26, 2022 Paula Ann Erickson was subpoenaed³ for 20 signatures. On May 24, 2022 Omni Document Examination concluded an expert analysis of the Erickson signatures.⁴

REDDINGTON

The court activity in 12LA178 in the 22nd Judicial Circuit Court that Allstate took part in, from the time that Dulberg declared bankruptcy and the case was placed under automatic stay are listed below:⁵

December 12, 2014	November 6, 2015
February 4, 2015	January 28, 2016
March 13, 2015	February 11, 2016
April 10, 2015	March 17, 2016
May 13, 2015	June 13, 2016
June 12, 2015	July 11, 2016
July 10, 2015	July 21, 2016
September 8, 2015	August 10, 2016
October 20, 2015	December 12, 2016

Allstate's purpose appears quite straightforward in the more than 24 months of 22nd Judicial Circuit Court proceedings:

- a. To keep the case outside of the jurisdiction of the Federal Bankruptcy Court.
- b. To place an upper limit on the value of the case in violation of the automatic stay.
(To urge Dulberg to settle the case for \$50,000 or less before June, 2016 and then to place an upper limit of \$300,000 on the value of the case from July, 2016 onward.)
- c. To not allow the Dulberg PI case to go to trial

First, Allstate attempted to settle the case through Dulberg's attorneys Popovich and Mast in the 22nd Judicial Circuit Court

Second, Allstate attempted to settle the case through Dulberg's attorney Balke in the 22nd Judicial Circuit Court

¹ [Group Exhibit 6-Margaret Orton signatures analyzed](#)

² [Fabrication 5 McGuires and McArtor deposition certification pages](#)

³ [Group Exhibit 8_2022-03-26_Paula Erickson subpoena](#)

⁴ [Group Exhibit 9_Paula Erickson signatures analyzed](#)

⁵ Each transcript for each court appearance is linkable in the table of contents of this document:

[Group Exhibit 41 Appeal Package for 17LA377/ROP Vol 1 of 1 230421 1628 8FF9DDF1.pdf](#)

Third, Allstate appeared as opposing counsel to Dulberg when Dulberg had no counsel and when Dulberg was told by the 22nd Judicial Circuit Court Judge Meyer that Dulberg had to file an appearance pro se or face a motion to dismiss.

Fourth, in the 22nd Judicial Circuit Court Allstate, in collusion with the Baudins, illegally capped the value of PI case 12LA178 against Dulberg's stated wishes and in violation of the automatic stay.

The last 5 court transcripts listed in paragraph 3 describe when and how Allstate attorney Reddington and the Baudins crafted the binding mediation agreement (which is the third attempt Allstate made to cap the value and settle the case through a third law firm claiming to represent Dulberg in a court with no jurisdiction over the PI case and while the case was under automatic stay).

Records of Proceedings of 12LA178 from June 13, 2016 to August 10, 2016 provide clear evidence of:

- a. **Who** placed a \$300,000 upper cap on the value of the personal injury case
- b. **When** the agreement was made
- c. **Where** the agreement was made

The \$300,000 upper limit was placed on the value of the PI case by: ***Allstate attorney Reddington colluding with the Baudins.***

They first discussed the possibility of binding mediation: ***on or before June 13, 2016.*** They came to a "semi-agreement": ***by July 21, 2016.***

They had a full agreement and a date set for the binding mediation hearing: ***by August 10, 2016.***

The agreement was made: ***in 22nd Judicial Circuit Court***

It was not until October 31, 2016 that the Baudins first received the authorization of the Federal Bankruptcy Court to be retained as special counsel with their client being the bankruptcy estate (of which Dulberg was a beneficiary) and to "pursue the personal injury case".

Allstate must have known that they were acting in violation of federal bankruptcy laws from November, 2014 onward.

The doctors depositions with no certification pages were then used by Allstate attorney Reddington and the Baudins.

The fact that 5 doctors depositions without valid certification pages were used by both Accardo and Reddington shows this approach is Allstate practice. Accardo and Reddington both ignoring the automatic stay shows that this approach is an Allstate pattern and practice.

None of the 3 different PI Law Firms retained by Dulberg informed Dulberg that Defendant

Gagnon effectively admitted negligence for Dulberg's injury as of early March, 2013. All 3 PI attorneys retained by Dulberg were opposing counsel to Allstate yet acted in ways that were favorable to Allstate. This took place when:

- a. the 22nd Judicial Circuit Court had no jurisdiction over PI case 12LA178 since November 2014
- b. Dulberg had no standing as plaintiff of the PI case 12LA178 in any court
- c. case PI case 12LA178 was under automatic stay

Each of the three law firms retained by Dulberg acted as if they represented Dulberg as plaintiff in the 22nd Judicial Circuit Court

All 3 PI law firms retained by Dulberg *collaborated with opposing counsel Allstate* when they did not inform their own client that the client of Allstate had admitted negligence for Dulberg's accident. Also, it is not possible to have all 5 depositions of doctors without certification pages without collaboration between opposing counsels to never order up or to use the medical depositions in any court document. Each attorney must have known the others were engaging in unethical behavior and, according to the "Himmel Rule" has the duty to report what they knew.

It is in this context that either Accardo or Reddington appeared as opposing counsel in the 22nd Judicial Circuit Court (that did not have jurisdiction over the case) 18 times over more than 24 months and made 3 different attempts to cap the value of and settle Dulberg's PI case (in violation of the automatic stay) with 3 different law firms claiming to represent Dulberg (who did not have standing as plaintiff). It is not possible that Allstate was not aware of these facts.

FLYNN

The integrated system of document and information suppression used against Dulberg was represented in this Visual Aid:

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

In 17LA377 the integrated system of document and information suppression exists to benefit the defendants and opposing counsel. George Flynn is opposing counsel. Flynn and defendants Mast and Popovich collaborated with all 3 legal malpractice law firms Dulberg retained for 17LA377 to subject Dulberg to the integrated system of document and information suppression.

The only accurate way to model the integrated system is like this:

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](#) (and supplementals)

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. Since each level is complex, the integrates system is highly complex and is for the most part inescapable for the targeted victim.

Flynn collaborated with each of the 3 law firms to help create the integrated system of document and information suppression that Dulberg experienced. A detailed timeline of when Dulberg's most recent legal malpractice attorney Talarico began collaborating with opposing counsel Flynn to sabotage Dulberg's claims is given in the following document (already provided to the ARDC):

[2024-02-13_Second Supplement to ARDC Complaint Against Alphonse Talarico, Part 1.pdf](#)

Flynn, as opposing counsel to all 3 law firms, more likely than not is the key architect and key beneficiary of the integrated system of document and information suppression used against Dulberg.

SYSTEM-BASED FRAUD ON THE COURT

Visual Aid 30 - Network of members of Illinois Bar who collaborated to target Dulberg

In the lower half of the oval are 10 Illinois attorneys who were retained by Dulberg and targeted Dulberg. On the upper half are attorneys acted as opposing counsel and who collaborated with Dulberg's attorneys and who benefited from the actions of Dulberg's attorneys. Dulberg's cases were sabotaged by Dulberg's own attorneys (in the lower part of the circle) so the clients of the attorneys in the upper half of the circle could be dismissed. Those in the upper half of the oval are the primary beneficiaries of the sabotage taking place by those in the lower half.

The whole system works to benefit those in the upper half of the circle. The attorneys in the lower half of the circle lose so the attorneys in the upper half of the circle can win. The integrated and highly complex system of document and information suppression is designed to force courtroom losses for the targeted case/victim and courtroom victories and dismissals for those in the upper half of the oval.

As grouped in Table 13, the collaboration between opposing attorneys occurred in 3 distinct stages with 3 different subgroups as shown in this Visual Aid:

Visual Aid 31 - Network of members of Illinois Bar who collaborated to target Dulberg

Work-Worked in 3 subgroups.png

In sub-group #1: Popovich-Mast, Accardo and Barch together created fake or false depositions with no certification pages or with forgeries as certification pages.

In sub-group #2: The depositions were used by Reddington and the Baudins to ‘cap the case’ and ‘settle the case’.

In sub-group #3: All legal malpractice attorneys collaborate to protect all attorneys in the blue and yellow regions.

The network of collaborating attorneys moves through the legal system as shown in this Visual Aid:

Visual Aid 32 - The attorney network moving through the court system

The blue region is PI case 12LA178. How Dulberg was treated by Dulberg’s own personal injury attorneys and by opposing counsels is documented in detail in the following ARDC complaints:

[ARDC Complaint Against Thomas J. Popovich and Hans Mast](#)

[ARDC Complaint Against Brad Balke](#)

[ARDC Complaint Against William Randall Baudin and Kelly Baudin](#)

The yellow region is where legal malpractice attorneys collaborate to target Dulberg once again. The light yellow region (consisting of Dulberg’s own legal malpractice attorneys) plays an instrumental role in protecting all attorneys who participated in fraud in the blue region from any consequences for their actions. How Dulberg was treated by Dulberg’s own legal malpractice attorneys and by opposing counsels is documented in detail in the following ARDC complaints:

The whole system is steered through the light yellow region. This is the unique ‘trade-mark’ of this particular system of fraud: **The system works by attacking the targeted victim through their own attorney.** The targeted victim is to be controlled through the light yellow region. This is done to sabotage their claims and benefit all other attorneys in the blue and yellow regions.

The attorneys in the light yellow region are to initiate weak, rigged complaints (into the green regions) that are intentionally designed to allow the defendants to be dismissed using (in most every case) pre-planned 2 year SoL ‘escape hatches’. These weak complaints designed to fail move through different layers of the green (state court) region.

One such complaint was 17LA377 consisting of COMPLAINT AT LAW and AMENDED COMPLAINT filed by Gooch-Walczyk and SECOND AMENDED COMPLAINT filed by Clinton-Williams. How the complaints were engineered to fail and how the complaints were a key component in a sophisticated and integrated system of document and information suppression was already described in:

[ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk](#)

Another such complaint was filed by Talarico in case 22L010905. The complaint was filed on December 8, 2022 and Talarico had been collaborating with opposing counsel Flynn in 17LA377 since at least July 11, 2022.

‘SYSTEM-BASED’ MODEL OF FRAUD ON THE COURT CONSISTENT WITH THE MAPPINGS, COLLABORATION CHARTS AND EVIDENCE

In this ‘system-based’ approach the individual attorney retained by Dulberg doesn’t matter. Only the system matters. This would help explain how the light yellow region operates. It doesn’t matter if Gooch-Walczyk or Clinton-Williams or Talarico are Dulberg’s legal malpractice attorneys because the result is the same: Dulberg is targeted through his own attorney. Dulberg could not escape being targeted by firing Gooch and retaining Clinton-Williams. In system-based fraud the fraud targets Dulberg through Gooch-Walczyk and then through Clinton-Williams and then through Talarico because the fraud follows the targeted victim as a system, not as if it comes from ‘bad apple’ individuals.

This also explains how the blue region operates. It doesn’t matter who Dulberg retains since whoever Dulberg retains will move to cap Dulberg’s claim against Allstate to favor Allstate. This is in fact what happened as Dulberg retained each new law firm in the light blue region. The results were basically the same each time. This is also in fact what happened as Dulberg retained each new successive law firm in the light yellow region. As Dulberg retained new attorneys, the new attorney, one by one, again targeted Dulberg while pretending they were not.

Activities in both the blue and yellow regions can be explained through a system-based approach. A system-based approach applied to the green region would anticipate the possibility that both personal injury cases and legal malpractice cases are regularly (or *systematically*) filed by the plaintiff’s attorney in a way that assures the defendants will not be held accountable. The lawsuit is initiated basically to fool the plaintiff.

In fact, the integrated system of document and information suppression Dulberg experienced demonstrate the system-based nature of how Dulberg is targeted by his retained legal malpractice attorney. The repeated pattern shows that these attorneys are not just a few “bad apples” and that the ARDC complaints document patterns and practices (a system) among all attorneys retained by Dulberg, including Talarico.

Two inter-dependent systems of document and information suppression:

- a. PI system of consuming an injured client: Advanced, coordinated ambulance-chasing followed by a ‘group mugging’ of the injured target (blue region)
- b. Legal malpractice system of protecting networks of attorneys that commit fraud: Networks of Illinois attorneys committing fraud to protect networks of Illinois attorneys committing fraud (yellow region)

Both inter-dependent systems function through members of the Illinois Bar collaborating with opposing counsels to steer specific cases in one direction according to pre-planned agreements. It is effectively a system of ‘horse-trading’ the interests of ones clients ‘under the table’ with other

attorneys and then ‘play-acting’ pre-planned scenarios in court with opposing attorneys.

How the system of fraud disguises itself:

- First, the permanently disabled targeted victim will be blamed by all collaborating attorneys. The system disguises itself as the victim’s failure to do something.
- Second, as a fall back position the system disguises itself as some failure of the victim’s attorney.

The only way a victim can defend themselves is to expose the actions of their own attorneys. But if the targeted victim could find problems with their attorney’s actions, the system once again disguises itself and takes the next fall back position: That the problems are only between the client and their attorney and do not involve anyone else. In other words, the blame is placed on the permanently disabled client once again.

The system works by attacking the targeted victim through their own attorney who are the people in the lower part of the oval in [Visual Aid 30](#). This means the system is steered through the light yellow region in [Visual Aid 32](#). This is the primary way the targeted victim is ‘choked’ and his claims are ‘killed’.

The system lives in disguise. The targeted victim is to blame, or if not then only the attorneys on the lower half of the oval in [Visual Aid 30](#) are to blame and the targeted victim is allowed to ‘sue them’.

The most well hidden and protected participants are on the upper part of the oval in [Visual Aid 30](#). This is the case even though there is reason to believe they are the chief architects of the system of fraud. Even if the victim finds a way to fight back this act will be treated as an internal ‘squabble’ between the targeted victim and their own counsel. Even if the victim can fight back, the chief architects of the system of fraud are protected through many layers of disguises.

The system of fraud escapes detection by:

- a. Blaming the victim first and foremost
- b. Fall back position: Blaming the victim’s attorney and therefore holding only the victim responsible for the consequences
- c. Second fall back position: Blaming the network of attorneys retained by the client as “bad apples” and the victim is ‘allowed to sue’ his former attorneys (where the system most probably repeats itself again in Illinois Circuit Court).

It is in the way that this system of fraud uses the victim’s own attorney to attack the victim that allows these many layers of disguises to provide protection to those who benefit most from the system of fraud. The main beneficiaries of the system of fraud can sit back and watch a problem develop between the targeted victim and their own attorney while the main beneficiaries are (in truth) directly involved in the acts of fraud on the court. The method of repeatedly attacking the targeted victim through their own personal injury attorneys and later through their own

legal malpractice attorneys gives the primary beneficiaries of the system of fraud the space and distance to remain safely protected by layers of pre-planned fall back positions and cover stories.

The only possible escape from the grave that the client was forced to dig for themselves is as follows:

- a. to discover the fraud on the court and collaboration between opposing attorneys and the sophisticated and multi-layered system of document and information suppression and
- b. to raise the issue with the ARDC and with any presiding Judge before the targeted cases are ‘killed’ for good.

For the large majority of targeted victims this monumental task is most probably impossible to undertake and their personal injury and legal malpractice claims will be weakened and ultimately destroyed as the system of fraud moves through Illinois courts.

PRIME MOVERS OF A SYSTEM OF FRAUD CAN BE IDENTIFIED BY WATCHING FOR WHO CONSISTENTLY BENEFITS FROM FRAUDULANT ACTIONS

A system of fraud is designed to hide and disguise the prime movers who are driving the fraud. If fraud is detected the system is designed to focus the blame on various levels of decoys and to take various fall back positions.

One way to see past the disguises and fall back positions is to record and examine who consistently benefited from individual acts by Dulberg’s retained attorneys.

**TABLE 16: INDIVIDUAL ACTS BY DULBERG’S RETAINED ATTORNEYS
COMPARED TO WHO BENEFITED FROM THE ACTS**

INDIVIDUAL ACTIONS OF DULBERG’S RETAINED ATTORNEYS	DID ALLSTATE BENEFIT?	DID DULBERG BENEFIT?
Popovich and Mast redirected medical lien liability from the Defendants to Plaintiff	Yes	No
Popovich and Mast forged documents and destroyed evidence (at least 15 examples)	Yes	No
Popovich and Mast corrupted the interrogatory and document production process to sabotage client’s case and to benefit defendants (in collaboration with opposing attorneys)	Yes	No
Popovich and Mast suppressed information on mental health issues related to Dulberg’s injury	Yes	No

INDIVIDUAL ACTIONS OF DULBERG'S RETAINED ATTORNEYS	DID ALLSTATE BENEFIT?	DID DULBERG BENEFIT?
Popovich and Mast corrupted the deposition process to sabotage client's case and to benefit defendants in collaboration with opposing attorneys (9 out of 10 depositions have no valid certification pages)	Yes	No
Popovich and Mast knew Defendant Gagnon effectively admitted to negligence for Dulberg's injury	Yes	No
Popovich and Mast knew Defendant Gagnon committed perjury	Yes	No
Popovich and Mast knew Defendant Carolyn McGuire committed perjury	Yes	No
Popovich and Mast committed settlement fraud	Yes	No
Popovich and Mast violated federal bankruptcy laws	Yes	No
Balke contracted with Dulberg (who Balke knew had no standing as plaintiff) and not with the Bankruptcy Trustee (who had standing as plaintiff)	Yes	No
Balke told Dulberg (about 11 weeks later) he would withdraw counsel if Dulberg does not settle with Allstate for \$50,000	Yes	No
The Baudins contracted with Dulberg (who Baudins knew had no standing as plaintiff) instead of with the Bankruptcy Trustee (who had standing as plaintiff)	Yes	No
The Baudins knew or should have known Defendant Gagnon effectively admitted to negligence for Dulberg's injury as early as March, 2013	Yes	No
The Baudins moved to cap the value of PI case 12LA178 (with defendants Allstate alone)	Yes	No
The Baudins closed the deal with an upper cap of \$300,000 (in violation of the automatic stay)	Yes	No
The Baudins coerced Dulberg to agree and misinformed him of where the 'upper cap' came from	Yes	No
The Baudins moved to contract with Bankruptcy Trustee only after capping value of 12LA178	Yes	No
The Baudins misled Bankruptcy Judge that Dulberg wanted Binding Mediation (about 11 weeks after the deal was closed)	Yes	No
Gooch-Walczyk and Clinton-Williams concealed key evidence in collaboration with each other (Tilschner v Spangler certified slip ruling)	Yes	No

INDIVIDUAL ACTIONS OF DULBERG'S RETAINED ATTORNEYS	DID ALLSTATE BENEFIT?	DID DULBERG BENEFIT?
Gooch-Walczyk and Clinton-Williams concealed the admission of negligence by Defendant Gagnon for Dulberg's injury in underlying case 12LA178 in collaboration with each other	Yes	No
Gooch-Walczyk and Clinton-Williams concealed Bankruptcy and Violations of Federal Bankruptcy Laws (automatic stay, loss of standing to pursue claim, capping value of assets in BK estate, etc) in collaboration with each other	Yes	No
Gooch-Walczyk and Clinton-Williams concealed true sources of \$300,000 upper cap on the value of the PI claim in collaboration with each other	Yes	No
Clinton-Williams concealed Dulberg's bankruptcy (from the 17LA377 Common Law Record and Reports of Proceedings)	Yes	No
Clinton-Williams suppressed emails from Saul Ferris	Yes	No
Suppress key evidence (Tilschner v Spangler certified slip ruling)	Yes	No
Clinton-Williams suppressed large numbers of emails from Brad Balke	Yes	No
Clinton-Williams collaborated with opposing attorney to flood Dulberg with over 6,000 documents just before Clinton-Williams withdrew as Dulberg's counsel	Yes	No
Clinton-Williams suppressed all information on what the Baudins did to Dulberg	Yes	No
Clinton-Williams suppressed evidence that Defendant Gagnon effectively admitted negligence for Dulberg's injury as early as March, 2013.	Yes	No
Clinton-Williams collaborated with opposing counsel to suppress Barch documents before Dulberg's deposition	Yes	No
Clinton-Williams collaborated with opposing counsel to weaken verification pages of discovery production	Yes	No
Clinton-Williams collaborated with opposing counsel during the deposition of Hans Mast and after Cannot introduce evidence of fraud on the court in 12LA178 and 17LA377 to Judge (even though it is critical to know in order to make an accurate decision)	Yes	No

INDIVIDUAL ACTIONS OF DULBERG'S RETAINED ATTORNEYS	DID ALLSTATE BENEFIT?	DID DULBERG BENEFIT?
Talarico did not introduce evidence of fraud on the court in 12LA178 and 17LA377 or of Clinton-Williams sophisticated system of document and information suppression or of Clinton-Williams collaboration with opposing counsel to any presiding Judge (even though it is critical to know in order to make an accurate decision)	Yes	No
Talarico allowed defendants to be dismissed on 2 year statute of limitations grounds while never raising evidence of Clinton-Williams sophisticated system of document and information suppression or Clinton-Williams collaboration with opposing counsel to any presiding Judge	Yes	No
Talarico played 'hoaxes' on Dulberg and planted 'time-bombs' in Dulberg's efforts to appeal	Yes	No
In the 2nd Appellate Court: Dulberg lost the right to know if Judges or the clerk grant or deny an order	Yes	No
Dulberg lost the right to know which Judges are involved in granting or denying an order (if any) so Dulberg lost the right to ask for recusal of any Judge	Yes	No
Dulberg lost the right to supplement the record with Meyer recusal information	Yes	No
Dulberg lost the right to supplement the record with bankruptcy information	Yes	No
Dulberg lost the right to appeal multiple issues listed in the appeal application	Yes	No
Dulberg lost the right to file an appeal	Yes	No

One would never know actions listed in the first column were of Dulberg's retained attorneys by looking at who benefited from the actions. The bias Dulberg's retained attorneys showed toward the opposing counsel instead of their own client is shown to be absurdly disproportionate in Table 16. One interpretation which is consistent with the mappings, fraud charts, evidence and Table 16 above is as follows:

- Allstate as the common point of corruption and prime mover.
- The attorneys in the light blue region effectively act as 'moles' or 'spies' (and effectively act as agents or employees) of Allstate.
- The attorneys in the light yellow region effectively act as 'moles' or 'spies' (and effectively act as agents or employees) of Allstate.

- Allstate ‘walks on water’ through the legal system.

A system-based approach shows that the light blue region works in a way that consistently benefits Allstate and the light yellow region also works in a way that consistently benefits Allstate. This remains true irrespective of which attorney or law firm Dulberg retained.

SYSTEM-BASED FRAUD IN ILLINOIS IS DESIGNED TO BYPASS AND BE INVISIBLE TO “SELF-POLICING” IN THE ILLINOIS BAR

What Dulberg experienced is:

- SYSTEMATIC collaboration between attorneys to sabotage the case of a targeted victim
- SYSTEM-BASED targeting of ones own client: Dulberg experienced being targeted by 6 consecutive Illinois law firms he retained. Dulberg’s legal malpractice claims were targeted by 3 consecutive Illinois law firms.

The following 4 reference sources can be used to check whether what Dulberg experienced has any similarities to other cases reported to the ARDC and to check about how often the ARDC acts upon discoveries of SYSTEM-BASED fraud:

[1\) A LAWYERS DUTY TO REPORT ANOTHER LAWYERS MISCONDUCT - THE ILLINOIS EXPERIENCE by Mary T. Robinson.pdf](#)

[2\) POLICE YOURSELF: A Guide for Understanding an Illinois Lawyer’s Duty to Report Other Lawyers’ Misconduct by Aaron-Michael H. Sapp](#)

[3\) iARDC Disciplinary records](#)

[4\) OPERATION GREYLORD: The True Story of an Untrained Undercover Agent and America’s Biggest Corruption Bust](#) By Terrence Hake

Listed references #1 to #4 allow us to observe of how often SYSTEM-BASED fraud through collaborating networks of members of the Illinois Bar is discovered and acted upon compared to cases involving individual ‘bad apples’.

There isn’t a single example of a network of collaborating attorneys mentioned or cited in references #1 and #2. The default viewpoint (that appears to be assumed the authors) of references #1, #2 is that there are a few ‘bad apples’ which are for the most part dealt with effectively in a well-regulated system of people who are generally honest. Also missing in references #1 and #2 are any examples of an individual attorney intentionally sabotaging the case of their own client.

The default world-view implied in references #1 and #2 is that Illinois attorneys collaborating and violating the Himmel Rule together and all targeting the same permanently disabled victim is not thought to be something Illinois attorneys would do or consider as a realistic possibility. The cases cited and situations described in references #1 and #2 do not address networks of collaborating attorneys who use systems of fraud to target victims at all. Reference #2 covers the key case law cited and the primary arguments used when discussing ‘self-policing’ of Illinois attorneys. References #1 and #2, by default, imply that SYSTEM-BASED fraud with networks

of a dozen or dozens of attorneys collaborating in SYSTEM-BASED fraud is not an issue worth considering. This default position implies that no special precautions need be taken against networks of members of the Illinois Bar using SYSTEM-BASED methods of fraud.

This is also true in the book about Operation Greylord (reference #4) written by former Illinois attorney and FBI agent Terrence Hake. The book gives many examples of case fixing for bribes. The book describes cases being ‘thrown’ for the benefit of opposing counsel by prosecutors and Judges. The repeated pattern is that they are throwing the State’s case out against some defendant for a private payout. **We have yet to read a single example given in the book about an attorney throwing their own client’s case.**

HOW AND WHY AN APPROACH TO ‘SELF-POLICING’ IN WHICH INVESTIGATORS LOOK FOR INDIVIDUAL ‘BAD APPLES’ WILL FAIL TO DETECT SYSTEM-BASED FRAUD

SYSTEM-BASED fraud is harder to detect because it actively works to conceal itself through many coordinated actions and methods that are not possible or available to an individual ‘bad apple’ working alone. SYSTEM-BASED fraud can effectively become a ‘concealment factory’.

SYSTEM-BASED fraud has the potential to do much more harm than individual ‘bad apple’ acts of fraud and can effectively act as a ‘harm assembly line’.

Sophisticated systems of document and information suppression applied in layers by ones own legal malpractice attorneys and directed at a targeted victim is almost impossible to defend against. A SYSTEM-BASED and coordinated suppression of documents and information fraud in which a targeted victim is SYSTEMATICALLY targeted by their own retained law firm (6 in a row in Dulberg’s case) is almost impossible to defend oneself against.

In contrast to references #1 and #2, Dulberg’s cases are mapped and detailed examples of SYSTEM-BASED fraud on the court in which a client’s civil cases are repeatedly sabotaged by his own retained attorney(s). It happened 6 times in a row to Dulberg and each of the 6 times are carefully mapped.

Any approach to self-reporting and ARDC investigations based on looking for individual ‘bad apples’ will most probably fail when trying to uncover SYSTEM-BASED fraud because if one individual in the group is examined for evidence of fraud, the following 4 step process is likely to occur:

Step #1: NO PAST, NO FUTURE

Step #2: NO SYSTEM, NO NETWORK

Step #3: FOCUS ON INDIVIDUAL ALONE

Step #4: DISMISS COMPLAINT

An excellent example of someone applying this 4 step process is given by Talarico when filing complaint 22L010905 on December 8, 2022 and is mapped in detail in the following timeline:

[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 Group Exhibit 49 timeline and it helps see the relation of each of these events to the others:

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

A detailed timeline of when Dulberg's most recent legal malpractice attorney Talarico began collaborating with opposing counsel Flynn to sabotage Dulberg's claims is given in the following document (already provided to the ARDC):

[Group Exhibit 51 First discovery of Meyer Recusal, forgery, fraud on court, collaboration with OC, other and Talarico burial of the same/](#)

The following Visual Aid helps see groups of key events that took place in the Group Exhibit 51 timeline:

[Visual Aid 26 - First discovery of Meyer Recusal, forgery, fraud on court, collaboration with OC, other and Talarico burial of the same.png](#)

Talarico was in possession of signature forgeries on deposition certification pages as of May, 24, 2022 (above the upper red line in [Visual Aid 26](#)).

Talarico was in possession of knowledge of a sophisticated system of document and information suppression which Clinton and Williams used against Dulberg in collaboration with opposing counsel Flynn since early November, 2022 (lower red line in [Visual Aid 26](#)).

This is what is meant by NO PAST, NO FUTURE. NO PAST means all evidence of fraud before involvement of the one individual is hidden. Each individual will be examined WITHOUT PAST (without evidence of the previous fraud they helped conceal). NO FUTURE means all evidence of fraud and fraudulent concealment after involvement of the one individual is hidden.

An excellent example is once again given by the timelines of Talarico. Defendants in 17LA377 and 22L010905 were let out due to the 2 year statute of limitations expiring:

Popovich and Mast were dismissed on February 1, 2023

Olsen was dismissed on May 25, 2023

The Budins were dismissed on August 29, 2022

In civil court this is done using 2 yer SoL 'escape hatches' for everyone being protected by the collaborating network. In an ARDC complaint this is done by taking no further action against the individual by the ARDC.

Talarico's actions mapped in the timelines provide visible, detailed examples backed by documentation of what is meant by NO PAST, NO FUTURE (step #1), NO NETWORK NO SYSTEM (step #2), FOCUS ON INDIVIDUAL ALONE (step #3), followed by DISMISS COMPLAINT (step #4).

As demonstrated by the example of Talarico, the 4 step approach will virtually guarantee an

investigator will not detect any SYSTEM-BASED fraud or any network. The SYSTEM-BASED network under threat dissolves into individuals who will all secretly act to protect detection of anyone in the network. They will obviously deny that either SYSTEM or NETWORK exists.

A SYSTEM-BASED network engaging in fraud will ‘evaporate’ into individuals who each claim to ‘know nothing’ of any system or any network or any fraud. for these reasons SYSTEM-BASED fraud among networks of members of the Illinois Bar are much harder to detect or investigate than individual cases of ‘bad apples’ (and much more dangerous to the public).

The individual ‘bad apple’ default viewpoint implied in references #1, #2 and #3 can help contribute to and cover for the establishment and growth of SYSTEM-BASED fraud by networks of members of the Illinois Bar by refusing to acknowledge that networks of members of the Illinois Bar **actually do collaborate in SYSTEM-BASED fraud**. It gives a SYSTEM-BASED network of fraud cover by acting as if it does not exist.

The ‘bad apple’ approach can contribute to growth and power of SYSTEM-BASED fraud by networks of members of the Illinois Bar by refusing to acknowledge that networks of members of the Illinois Bar **actually do target victims through their own attorneys systematically**.

IT IS NECCESARY NEED TO TAKE A ‘SYSTEM-BASED’ APPROACH TO FRAUD IN DULBERG’S CASE

We are quite certain there is a need for a SYSTEM-BASED approach when investigating the Dulberg case.

In Dulberg’s case his legal malpractice claims were attacked through his retained legal malpractice attorney. This happened 3 times in a row. The most recent experience Dulberg had with his most recent legal malpractice attorney is instructive as shown in this Visual Aid:

[Visual Aid 33 - Talarico document and information suppression shields all other attorneys from liability.png](#)

Each relationship in [Visual Aid 33](#) (shown as a line) includes something of benefit that Talarico did for that member of the Illinois Bar. Each relationship carries benefits for that particular member of the Illinois Bar. Talarico was quite generous. The only parties that Talarico did not act to benefit were his own clients. This appears to be a special set of relationships in the network in which gifts are given to everyone in the network.

This is also the key point in the system from which Dulberg’s case can be effectively destroyed for the benefit of everyone except Dulberg. The most recent legal malpractice law firm plays a central role in protecting all other collaborating members of the Illinois Bar. **The system works by sabotaging the targeted victim’s claims through their own retained attorney(s)**. As the targeted victim’s claims collapse, the targeted victim is blamed by all members of the network.

We are quite certain there is a need for a SYSTEM-BASED approach in the Dulberg case. If ARDC investigators do not recognize the mappings of SYSTEM-BASED collaboration between sets of opposing counsels and instead treat each individual as an individual atom

with NO NETWORK, NO SYSTEM, NO PAST AND NO FUTURE, then the investigators will most probably dismiss each case, allowing the existing, mapped network to continue as a ‘concealment factory’ and a ‘harm factory’ for many more potential victims.

It is our position that the mappings, evidence and timelines given in [our ARDC complaints](#) and on our website exist and that they map real events that actually occurred. The website and ARDC complaints contain direct detailed mappings of:

- A Sophisticated System of Document and Information Suppression Used Against Dulberg’s Personal Injury Claims
- A Sophisticated System of Document and Information Suppression Used Against Dulberg’s Legal Malpractice Claims
- SYSTEM-BASED Fraud That Targets a Permanently Disabled Illinois Resident
- SYSTEM-BASED Fraudulent Concealment Used Against a Permanently Disabled Illinois Resident
- A Record of Dulberg’s first discovery and many, many efforts to notify the Illinois Supreme Court (through the ARDC) and presiding Judges of Clinton-Williams document suppression and collaboration with opposing counsel
- A Record of Notifying Illinois State and Federal Authorities of Fraud and Fraud on the Court

These things actually exist and they are mapped in detail. We cite reference #1 through #4 to show that SYSTEM-BASED fraud as we have mapped or SYSTEM-BASED fraud as a whole can easily escape detection in investigations using methods which are not designed to detect networks of collaborating Illinois attorneys.