

From: Paul Dulberg (and) Thomas Kost (Full trustee of the Paul R. Dulberg Revocable Trust)
4606 Hayden Ct.
McHenry, IL. 60051
(847) 497-4250

**To: Scott Renfroe Deputy Administrator, Appeals and the ATTORNEY
REGISTRATION AND DISCIPLINARY COMMISSION of the SUPREME
COURT OF ILLINOIS**
One Prudential Plaza
130 East Randolph Drive, Suite 1500
Chicago, Illinois 60601-6219
(312) 565-2600 (800) 826-8625
Fax (312) 565-2320

By email: Vicki Andrzejewski <vandrzejewski@iadc.org>, Theresa Bulatovic
<tbulatovic@iadc.org>, Christine Klimas <cklimas@iadc.org>, Scott Renfroe
<srenfroe@iadc.org>, information@iadc.org, ARDCClerksDepartment@iadc.org,
rshah@iadc.org, amundt@iadc.org, mguzman@iadc.org

Date: February 17, 2024

**Re: Letter of February 7, 2024 from the ATTORNEY REGISTRATION AND
DISCIPLINARY COMMISSION of the SUPREME COURT OF ILLINOIS signed
by Scott Renfroe (MAINLIB_#1709737_v1) concerning Hans Anton Mast and
Thomas J. Popovich No. 2023IN03135 No. 2023IN03136**

Dear Scott Renfroe and the ATTORNEY REGISTRATION AND DISCIPLINARY
COMMISSION of the SUPREME COURT OF ILLINOIS,

We received [your letter of February 7, 2024](#). We respectfully disagree with your
conclusion and decision to take no further action. The reasons we disagree are stated in this letter.

There must be some confusion because your letter does not address what we claimed in our
ARDC complaints that you dismissed. For example, we provided 15 instances of forgery by
Popovich and Mast and evidence destruction. We stated that 9 out of 10 depositions have no
valid certification pages.

This is the ARDC Complaint we filed on September 16, 2023:

[2023-08-28_ARDC Complaint Popovich-Mast.pdf](#)

Page 1 of the above linked document gives a summary of what we state in the complaint with
links to all sections. We put it on page 1 and made it linkable for ease of access (so everyone is
sure to see it). All of our key claims in the Popovich and Mast ARDC complaints are listed and
accessible as:

a) go to page 1

b) click link.

The key claims in the first 9 ARDC complaints we submitted are viewable the same way. Your letter does not address a single issue we raised in our 143 page ARDC complaint against Popovich and Mast.

You stated in your February 7, 2024 letter,

“You stated that Mr. Popovich and his associate, Hans Mast, filed a complaint and took other action to pursue your claims, and that they handled your claim incompetently, to your financial detriment.”

But we did not claim this in the ARDC complaints. We provided 15 instances of forgery by Popovich and Mast and evidence destruction.

We stated that 9 out of 10 depositions had no valid certification pages. Our statements can be seen by (a) go to page 1 and (b) click link. None of this was addressed in your letter.

Instead, your letter appears to be confined only to information Popovich and Mast provided the ARDC in their response to the ARDC complaints linked here:

[2023-10-27_Mast Reply ARDC.pdf](#)

There is no evidence contained in [your letter of February 7, 2024](#) or in any statement by the ARDC that the contents of the [ARDC Complaint Against Thomas J. Popovich and Hans Mast](#) were ever read. By this I mean there is not one sentence or phrase from the ARDC that verifies in any way that any portion of our 74 page complaint was read since there is not a single portion of any of it that was addressed, quoted or referenced.

We also filed the following complaint with the ARDC on July, 27, 2023:

[ARDC Complaint Against Edward X. Clinton and Julia C. Williams.pdf](#)

The Clinton-Williams complaint maps how Clinton-Williams used a sophisticated system of document and information suppression in collaboration with opposing counsel Flynn to sabotage Dulberg's claims in 17LA377.

And we submitted the following ARDC complaint on November 8, 2023:

[ARDC Complaint Against THOMAS W GOOCH-and SABINA WALCZYK.pdf](#)

This is another legal malpractice law firm retained by Dulberg that collaborated with opposing counsel Flynn in 17LA377. They also used a system of document and information suppression in collaboration with opposing counsel Flynn to sabotage Dulberg's claims in 17LA377.

In addition, within the last month it was discovered that our recent former counsel Talarico was also using his own sophisticated system of document and information suppression to sabotage Dulberg's claims in 17LA377 and in 22L010905 and to cover up the sophisticated system of document and information suppression applied by Clinton-Williams. Talarico was also caught working in collaboration with Flynn.

We filed the following ARDC Complaint with the ARDC on January 22, 2024:

**[ARDC COMPLAINT AGAINST ILLINOIS ATTORNEY ALPHONSE TARARICO
ARDC #6184530, PART 1](#)**

(and)

[SUPPLEMENT TO ARDC COMPLAINT AGAINST ALPHONSE TARARICO, PART 1](#)

This is yet another Illinois attorney retained by Dulberg who was collaborating with opposing counsel Flynn. Talarico suppressed forgeries of court reporter signatures since around May 24, 2022. This was to benefit Popovich, Mast and Flynn (among others). Talarico was also given detailed knowledge of the sophisticated system of document and information suppression used by Clinton-Williams in collaboration with Flynn but Talarico never informed the ARDC or any presiding Judge of the sophisticated system of document and information suppression used by Clinton-Williams in collaboration with Flynn.

Since your letter of February 7, 2024 we have also filed the following ARDC complaint on February 14, 2024:

[ARDC Complaint Against FLYNN, ACCARDO, REDDINGTON, BARCH.pdf](#)

This complaint is against 3 opposing attorneys in 12LA178 that produced the 9 depositions with signature forgeries and no certification pages and then used the fake depositions to cap the value of 12LA178 and force a settlement. These are the same 9 depositions with signature forgeries and no valid certification pages that we provided to you. This is also an ARDC Complaint against Flynn for collaborating with all 3 Illinois law firms retained by Dulberg in 17LA377.

We also submitted to the ARDC a detailed timeline of when Talarico first began to collaborate with opposing counsel Flynn:

**[SECOND SUPPLEMENT TO ARDC COMPLAINT AGAINST ALPHONSE TARARICO,
PART 1](#)**

What this means is that the only complaints filed in 17LA377 on Dulberg's behalf ([COMPLAINT AT LAW](#), [AMENDED COMPLAINT](#) and [SECOND AMENDED COMPLAINT](#)) were written and filed by attorneys who were collaborating with opposing counsel Flynn. They were basically 'moles' or 'spies' working with opposing counsel Flynn.

The information we submitted to the ARDC is marked in red in the following Visual Aid:

[Visual Aid 34 - Information provided to ARDC compared to information that ARDC based decision on.png](#)

But the only information the ARDC appears to have considered in the letter of February 7, 2024 is marked in blue in [Visual Aid 34](#). There is no evidence from [your February 7, 2024 letter](#) and in all communication with the ARDC to date that anyone read any of the information marked in red in [Visual Aid 34](#).

Table 17 below gives links to all complaints we have submitted to the ARDC. Column 2 gives a link to the only document that Popovich and Mast submitted in response. Column 3 gives a link

to the ARDC analysis and conclusions based on the information they received.

TABLE 17: WHAT DULBERG, POPOVICH AND MAST PROVIDED TO THE ARDC AND ARDC CONCLUSIONS

What Dulberg provided ARDC	What Popovich, Mast, Flynn provide to ARDC	ARDC analysis and conclusion
ARDC Complaint against Edward X. Clinton and Julia C. Williams ARDC COMPLAINT AGAINST THOMAS J. POPOVICH AND HANS MAST ARDC COMPLAINT AGAINST THOMAS W GOOCH AND SABINA WALCZYK ARDC COMPLAINT AGAINST KELLY N BAUDIN AND WILLIAM RANDALL BAUDIN II ARDC COMPLAINT AGAINST BRAD J BALKE 2024-01-05 Supplemental to 9 ARDC complaints Dulberg's efforts to raise issue of Clinton-Gooch-Popovich fraud on court to presiding judge.pdf ARDC COMPLAINT AGAINST ILLINOIS ATTORNEY ALPHONSE TALARICO ARDC #6184530, PART 1 SUPPLEMENT TO ARDC COMPLAINT AGAINST ALPHONSE TALARICO, PART 1 SECOND SUPPLEMENT TO ARDC COMPLAINT AGAINST ALPHONSE TALARICO, PART 1 ARDC COMPLAINT AGAINST GEORGE FLYNN, RONALD BARCH, PARRY ACCARDO, SHOSHAN REDDINGTON	Popovich-Mast Reply to ARDC Complaint	Letter of February 7, 2024

There is no connection between the information in column 1 and column 3 in Table 17. The ARDC analysis and conclusions in column 3 references material in column 2 only. The information in column 1 effectively does not exist in the 3 page analysis in column 3.

What Dulberg described in column 1 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.

Therefore:

Fact A: We provided detailed evidence to the ARDC that 3 consecutive Illinois law

firms collaborated with opposing counsel (Flynn) to sabotage Dulberg's legal malpractice case 17LA377 against Popovich and Mast.

Fact B: We have provided evidence of 15 different examples of forgery, some examples including multiple manipulated documents in the underlying case 12LA178.

Fact C: We have provided evidence that 9 out of 10 (fake) depositions have no valid certification page.

Fact D: The ARDC concludes that they will take no further action because this amounts to 'retrying the case 17LA377'

We believe that most reasonable people who look at the sequence above will realize that "Fact D" contradicts "Fact A" and "Fact B" and "Fact C". We express this contradiction in the following Visual Aid:

[Visual Aid 35 - Elephant in the room - Systematically targeted by ones own legal malpractice attorneys in collaboration with opposing counsel.png](#)

We provided direct evidence that Flynn collaborated with all 3 law firms that were retained by Dulberg in 17LA377 to sabotage Dulberg's claims in 17LA377. Flynn is directly involved with the 'elephant in the room' to such a degree that it could be said that Flynn is the 'elephant in the room'. The ARDC conclusions are in agreement with Flynn, who is the person who was at the center of the collaboration and sabotage in 17LA377.

We have mapped in detail the integrated system of document and information suppression and we have provided all the information to the ARDC. Flynn must have been at the center of orchestrating this integrated system of document and information suppression as opposing counsel the entire time.

Table 17, column 1 lists the documents we have provided to the ARDC. The same information appears on a public website as the links marked in red in [Visual Aid 34](#). Yet [your letter of February 7, 2024](#) addressed none of it. We express this contradiction in the following Visual Aid:

[Visual Aid 36 - Elephant in the room - SYSTEM-BASED fraud and SYSTEM-BASED document and information suppression.png](#)

The '3 elephants' in [Visual Aid 36](#) are the same as the main categories of information we have provided the ARDC marked in red in [Visual Aid 34](#) (which is the same as the information in [the 14 complaints we submitted to the ARDC](#) to date listed in Table 17, column 1). It is our position that the February 7, 2024 letter ignores the 'elephant in the room' shown in [Visual Aid 35](#) and the 'three elephants in the room' shown in [Visual Aid 36](#).

OUR POSITION IS THAT THE MAPPINGS AND EVIDENCE EXIST

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 in 12LA178
- A Sophisticated System of Document and Information Suppression Used Against

Dulberg's Legal Malpractice Claims in 17LA377

- SYSTEM-BASED Fraud That Targets a Permanently Disabled Illinois Resident
- SYSTEM-BASED Fraudulent Concealment Used Against a Permanently Disabled Illinois Resident

The dilemma is simple: Does this information exist or doesn't it?

It is our position that this information exists. It is this firm position that distinguishes us from all opposing interests including the position taken in [your letter of February 7, 2024](#). It is our position that:

- Sophisticated systems of document and information suppression do exist and we have mapped them in detail.
- System-based (systematic) fraud exists and we have provided detailed mappings of how this system operates. The mappings exist. They represent events that actually happened.
- Forgery exists
- Destruction of key evidence exists.
- Collaboration between opposing parties exists. Networks of collaboration do exist.
- We have provided evidence that 6 consecutive attorneys retained by Dulberg were basically 'spies' or 'moles' for opposing counsels.
- The timelines assembled on our website are accurate and describe sequences of events that actually took place.

Our positions could not be clearer. We state the information exists. Those who do not acknowledge this seem to imply that the evidence (over 50 Gigabytes) and detailed mappings do not exist.

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 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 by the authors of references #1 and #2) is that there are a few 'bad apples' who are 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. It is not a problem in Illinois.

Reference #2 covers the key case law cited and the primary arguments used when discussing 'self-policing' of Illinois attorneys. 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. 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 in Illinois. This default position implies that no special precautions need to be taken against networks of members of the Illinois Bar using SYSTEM-BASED methods of fraud.

This is also true of 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’.

A SYSTEM-BASED using a coordinated suppression of documents and information where a 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 which actually occurred. 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 is 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 investigated 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 explanation of each step follows. 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 to 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 (green box and lower red line in [Visual Aid 26](#)).

Steps #1 to #3 are to isolate each person under investigation from the group environment.

As Dulberg has informed the ARDC, the system of collaborating attorneys worked as 3 sub-groups 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](#)

Forged documents and 9 out of 10 depositions without valid certification pages were created in sub-group #1. Sub-group #2 received the fake depositions and forgeries and forced a settlement in violation of the automatic stay. Sub-group #3 are legal malpractice attorneys

When Talarico filed a complaint against the Baudins (in sub-group #2) he knew about the forged documents and the 9 out of 10 depositions without valid certification pages that sub-group #2 received but Talarico never raised the issue. This is NO PAST. The forgeries coming from sub-group #1 are ignored during the entire litigation of 22L010905.

Talarico was collaborating and shielding other members of sub-group #3 (in yellow) from detection. Talarico knew about the sophisticated system of document and information suppression that Clinton-Williams used against Dulberg but never raised the issue. This is NO FUTURE.

If filing a lawsuit against someone in sub-group #2, ignoring the activity in sub-group #1 is NO PAST. Ignoring the systems of document and information suppression and collaboration with opposing counsel is NO FUTURE. In NO PAST the initial fraud is hidden. In NO FUTURE the fraudulent concealment the legal malpractice attorneys are covering up and concealing from their own targeted client is hidden.

With NO PAST and NO FUTURE and with all those under investigation isolated from one another, it is much easier to hide evidence of collaboration and of the acts of targeting the victim systematically so NO NETWORK and NO SYSTEM follows naturally.

After suppressing the forgeries and 9 of 10 depositions with no certification page in sub-group #1 and collaboration between opposing counsel in sub-group #3, 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 Baudins were dismissed on August 29, 2022

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 is much harder to detect or investigate than individual cases of ‘bad apples’ (and much more dangerous to the public).

IT IS NECESSARY 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 (at the victim’s expense).

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.

We have made a set of tables called [FRAUD CHART by attorney](#) and [FRAUD CHART by case](#) to show the systematic and repeating patterns of document and information suppression Dulberg experienced from 6 consecutive Illinois law firms retained by Dulberg.

We’ve also described the same repeating actions in documents submitted to the ARDC as:

- 1). . . . ‘Bury’ key evidence
- 2). . . . ‘Bury’ fraud
- 3). . . . ‘Bury’ troublesome issues
- 4). . . . ‘Set up 2 year escape hatch’
- 5 - 12) . . ‘Choke’ client
- 13) ‘Run for cover stories’.

This is a repeating pattern of what Dulberg actually experienced. These acts were intentional.

We disagree with the ARDC findings for the many reasons already stated. We also disagree because it is possible that the ARDC can (unwittingly) follow the same pattern as the attorneys who acted intentionally. In [Fraud Chart by attorney](#) we show a repeating pattern (#1 to #13) through which consecutive law firms can target a client as a victim. Table 18 below shows how this same pattern listed as #1 to #13 can continue unintentionally through an ARDC investigation. In Table 18 we show that the same repeating actions can effectively take place in ARDC investigations even without anyone intentionally driving the process (as if by its own momentum).

TABLE 18: ACTS COMMITTED REPEATEDLY BY DULBERG’S RETAINED

ATTORNEYS CAN BE INADVERTENTLY BE REPEATED BY THE ARDC

Acts committed repeatedly by Dulberg's retained attorneys as listed in Fraud Chart by attorney and mapped in 14 ARDC complaints submitted by Dulberg	How ARDC conclusions can inadvertently repeat the same general patterns that Dulberg's retained attorneys followed.
1) Bury key evidence	The key evidence is in the 14 ARDC Complaints we have submitted. It is expressed as the elephants in Visual Aid 35 and Visual Aid 36 .
2) Bury Fraud	Elephant #3 in Visual Aid 36 is a description of SYSTEM-BASED fraud which targeted Dulberg through his own retained attorney(s)
3) Bury troublesome issues	This can accidentally result by not 'connecting the dots' or by not 'seeing the forest' through the trees.
4) Set up 'escape hatch'	An investigation which unwittingly applies NO PAST, NO FUTURE, NO NETWORK, NO SYSTEM, INDIVIDUALS ONLY most probably will result in taking no further action.
5-12) choke client	This is the process of not addressing any of the information marked in red in Visual Aid 34 while only addressing the information marked in blue. This is also the process of not addressing any of the information in Table 17, column 1 while only addressing information in Table 17, column 2. There is no evidence in the February 7, 2024 conclusion that the ARDC complaint was ever read.
13) cover story	Contents of the February 7, 2024 letter can unwittingly and effectively act as a type of 'cover story' by drawing conclusions which appear in no way connected with the ARDC Complaint Against Thomas J. Popovich and Hans Mast or with any of the 14 ARDC complaint we have submitted.

Key evidence can continue to be 'buried' by simply not addressing it. This is shown in Table 17 where the contents of column 1 seem to have no effect or influence on the contents of column 3. This is also shown in [Visual Aid 34](#) where contents the links marked in red have no connection to the conclusions of [your letter of February 7, 2024](#) and only information in blue was used and referenced in the letter.

Fraud can be 'buried', not intentionally, but simply by not acknowledging the information in Table 17 column 1 while confining ones conclusions to a 3 page analysis which addresses only information presented in Table 17, column 2.

One of the defining features of the patterns shown in [Fraud Chart by attorney](#) and [Fraud Chart by](#)

[case](#) is that the targeted victim is repeatedly ‘choked’ by their own attorney(s) over and over. It doesn’t matter which attorney Dulberg has and it doesn’t matter which case it involved, Dulberg as plaintiff is repeatedly ‘choked’ using a wide range of techniques described in detail in the complaints we submitted to the ARDC (listed in Table 17, column 1).

This same ‘choke’ can be continued, though unwittingly, through the ARDC in the way described in Table 18. We have claimed there is no evidence that the information we provided to the ARDC listed in Table 17, column 1 played even the slightest role (or was read) when drawing the conclusions stated in Table 17, column 3 ([your February 7, 2024 letter](#)). The result effectively acts to ‘choke’ Dulberg to an extreme degree since, according to Illinois law, the ARDC is the only Illinois institution authorized to handle disciplinary matters involving members of the Illinois Bar.

This is true in general. If any person within the jurisdiction of Illinois Courts is repeatedly targeted by their own attorney(s) who are members of the Illinois Bar, to what agency or office can the targeted person report the offenses in order to have the attacks stop? Our understanding is that by Illinois law any person who finds themselves repeatedly targeted by their own retained attorneys who are members of the Illinois Bar should report the actions to the ARDC. This is most certainly the conclusion one would draw from the following documents referenced earlier (and reproduced for convenience):

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

Our point is that while [FRAUD CHART by attorney](#) maps repeating patterns of action which were done intentionally, Dulberg can be ‘choked’ unintentionally also by not having any of our actual ARDC complaints in Table 17, column 1 addressed while the ARDC draws conclusions which reference only information in Table 17, column 2.

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**.

This, too, can inadvertently act as a ‘cover story’ for those participating in SYSTEM-BASED fraud in NETWORKS of members of the Illinois Bar.

In conclusion, we disagree with your conclusion in the letter for reasons stated in this document.

The ARDC, though unwittingly, appears to be following the same general method of ‘choking’

Dulberg that 6 consecutive Illinois law firms have already used.

- a) The information in Table 17, column 1 is ignored as if it does not exist.
- b) ARDC conclusions in the letter of February 7, 2024 references only information in Table 17, column 2, which was prepared by Flynn, Popovich and Mast.

It is our position that the information on our website exists. It is our position that the network of collaborating attorneys which target Dulberg is real and mappable. By law, we are reporting the evidence of the network to the ARDC, which according to Illinois law is the only authority authorized to deal with issues of attorney discipline.

Whether or not this system of fraud exists and whether or not a targeted victim is repeatedly attacked through their own attorney is important. If it exists, but the ARDC does not acknowledge it exists, then the system and the network become the direct responsibility of the ARDC because, by law, they are the only entity that can act to stop it.

It is the ARDC that can stop the network, but it is also the ARDC that gives it authority to function and protects it. Ignoring the elephant(s) in the room becomes the same as protecting and preserving the elephant(s) in the room.

Due to the reasons stated, we respectfully disagree with your conclusion and decision to take no further action.

/s/ Paul Dulberg
Paul Dulberg

/s/ Thomas Kost
Thomas Kost
(Full trustee of the Paul R. Dulberg Revocable Trust)