

From:

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Dated: January 22, 2024

To:

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Members of the ARDC Committee,

We are submitting a tenth ARDC Complaint.

This ARDC complaint is against Alphonse Talarico ARDC #6184530.

We have submitted 9 previous 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)

We've also produced the following 5 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](#)

All 5 documents linked above have exhibits placed in a [shared single folder](#).

When we filed our first ARDC complaint in July 27, 2023 we mde the following statement:¹

¹ [Cover letter for ARDC Complaint Against Edward X. Clinton and Julia C. Williams sent to ARDC on July 27, 2023](#)

The people against whom these acts were done would like to state, in simple laymans terms, that attorneys in the Illinois Bar have access to sensitive information of their clients and these attorneys act in a position of trust similar to that of a medical doctor. If a medical doctor used their position of trust, knowledge, skill, privilege, and membership in the AMA to basically drug and rape certain clients, we would all be able to see such behavior as a serious breach of social trust and if how they acted were publicly known, I believe we could all agree it would be unthinkable to allow them to continue to work as medical doctors.

In parallel, the sabotaging of claims of a permanently disabled client seeking redress for wrongs by using the techniques described in this complaint is stunningly vacuous with respect to any concept of ethics and decency. To allow professional attorneys who act in these ways to continue to practice as attorneys in Illinois, while knowing the techniques of deception they have used on at least one of their own (handicapped) clients, is to allow stealth predators to feed on the general population as prey while using their membership in the Illinois Bar as cover.

When we wrote the statement above we did not know our attorney at that time was ***also doing the same thing to us as the others before him.*** The current ARDC complaint being submitted against Alphonse Talarico (in which Talarico became increasingly hostile to us in the middle of submitting the Supreme Court Petition) demonstrates that our words are truer than ever. Talarico has just provided more evidence that our claims are true, and that now they are truer than ever.

THE MAPPINGS AND TABLES IN THE 10 ARDC COMPLAINTS WE SUBMITTED REVEAL A PROBLEM WITH THE ILLINOIS BAR

What happened to Dulberg can be seen as a mutual agreement among a group of Illinois attorneys to violate the Himmel rule together.

As a rule, the ARDC looks for factors beyond whether an attorney knew of, but failed to report, misconduct. Two such factors drove the Court's decision to discipline Himmel: evidence that the failure to report enabled the offending lawyer to cause additional harm to others and evidence that the nonreporting attorney chose to withhold a report for personal gain. Another consideration is whether the failure to report impacted public perception of the integrity of lawyers.²

Our argument is simple. We believe it is important to recognize that what Dulberg is experiencing and documenting is a problem with and in the Illinois Bar. It is not the fault of Dulberg. The case of Talarico once again demonstrates that the problem Dulberg faces is that networks of Illinois attorneys will consistently be protected by other attorneys at the client's expense (literally). The case of Talarico shows that it is very hard for a person to file a lawsuit against a network of attorneys because ones attorney will (more likely than not) secretly work to sabotage ones case and protect the network of attorney defendants. The case of Talarico, in addition to all the other

² A LAWYER'S DUTY TO REPORT ANOTHER LAWYER'S MISCONDUCT : THE ILLINOIS EXPERIENCE by Mary T. Robinson, available through Illinois Bar website

ARDC complaints we have filed to date, shows the danger we face and have been facing in the Illinois court system in a transparent way.

The cause of what is happening to Dulberg is the inability for the Illinois Bar to take care of an issue which is caused by the Illinois Bar. Dulberg suffers the result but the problem lies in the inability of the Illinois Bar to enforce a culture where violations of the Himmel Rule are not treated as a joke. It is the inability for the Illinois Bar and Illinois Courts to enforce a working system of self-regulation. The people who did this and continue to do this to Dulberg seem to operate with impunity in an atmosphere in which ***such horrific treatment of a permanently disabled person is treated as if it is the norm.***

Please consider:

Fact #1: The information in the 9 ARDC complaints was all known to Talarico.

Fact #2: Talarico, in possession of the information in the 9 ARDC complaints, could still secretly work to sabotage Dulberg's cases and hide the information in the ARDC complaints from court records.

The sequence fact #1-fact #2 as shown above can keep going on and on, and the following quote by Einstein seems insightful here: "Insanity is doing the same thing over and over and expecting different results."

We are requesting that the following be recognized to be true:

- 1) What we are documenting and mapping in the 10 ARDC Complaints is that we are being targeted by a network of Illinois attorneys. This is a problem with the Illinois Bar and not with Dulberg.
- 2) Some special emergency status needs to be given to this case to stop the ongoing abuse where a network of members of the Illinois Bar continue to target a permanently disabled U.S citizen and resident of Illinois.
- 3) Only the ARDC and the Supreme Court have the power to intervene.

We are begging all members of the Illinois Bar who read this to recognize that the 10 ARDC Complaints Dulberg has submitted map networks of corruption among a group of fellow members of the Illinois Bar and that Dulberg cannot possibly defend himself against this network if it continues to be ignored.

We claim that the PI case 12LA178 is a documented, mapped example of systematic and widespread fraud on the court and we have provided substantial evidence to support our claims. The fraud on the court was so systematic and pervasive that we challenge anyone who disagrees with us to ***locate portions of case record of 12LA178 which are NOT either fraud on the court or affected by fraud on the court.***

We claim that the legal malpractice case 17LA377 is also a documented, mapped example of systematic fraud on the court and we have provided substantial evidence to support our claims.

We challenge anyone who disagrees to *locate portions of case record of 17LA377 which are NOT either fraud on the court or affected by fraud on the court.*

We wrote the following to the ARDC on December 12, 2023:³

We cannot allow handicapped, disabled and injured people to be mere food sources for attorneys with no sense of ethics. The attorneys have all the advantages, the injured people have none.

Especially dangerous are networks of attorneys as the Dulberg case shows. If they are defended and allowed to continue to work in the legal system, handicapped and disabled people do not have a 'snowball's chance in hell' to make claims to seek justice in Illinois courts.

The named attorney used their memberships in the Illinois Bar as a vehicle to prey on their own permanently disabled client. They collectively treated the Himmel Rule as if it is a joke. The concealment of fraud was so systematic that Dulberg was most probably not their first target.

To allow this to continue or to look the other way while it happens is to allow pure predation on injured, disabled and handicapped people to take place while using the Illinois court system and membership in the Illinois Bar as the vehicles to accomplish these ends."

Again, when we wrote the statement above we did not know that our recent attorney was secretly acting as part of the same system. We were apparently just a food source for Talarico, too. We are begging those with the power to intervene to do so. Please act to stop the continuing targeted attacks on Dulberg by a clandestine network of members of the Illinois Bar.

All supporting exhibits to this ARDC COMPLAINT AGAINST ALPHONSE TALARICO, PART 1 are hyperlinked to the documents on our website.

If the ARDC should request, we will place all hyperlinked exhibits on flash-drives that will be mailed to 130 E. Randolph Dr., Ste. 1500 Chicago, IL 60601-6219. Please advise to whom it should be addressed and how many flash-drives are needed.

/s/ Paul Dulberg
Paul Dulberg

/s/ Thomas Kost
Thomas Kost
Full Trustee of the Paul R. Dulberg Revocable Trust

³ [Dulberg Response to Popovich Reply ARDC 2023IN03135.pdf](#)