

From: Paul Dulberg at Paul_Dulberg@comcast.net
Thomas Kost at tkost999@gmail.com

To: Scott Renfroe at srenfroe@iardc.org

Re: Thomas William Gooch, III in relation to Paul Dulberg No. 2023IN03895

August 22, 2025

Dulberg's reply to: "LTR - IBC Dulberg - Gooch 4919-1540-2334 v.1.pdf" dated August 12, 2025

Mr. Scott Renfroe, We would like this document submitted to those reviewing Gooch's actions.

A FURTHER RECORD OF HOW GOOCH (TOGETHER WITH CLINTON AND WILLIAMS AND TALARICO) INTENTIONALLY DESTROYED DULBERG'S CLAIMS IN 17LA377 AGAINST ACTUAL AND POTENTIAL DEFENDANTS

Thomas Gooch is the first of 3 law firms that represented Dulberg in case 17LA377. After Dulberg fired Gooch Dulberg retained the Clinton law firm. After the Clinton law firm resigned as counsel Dulberg retained Alphonse Talarico. The ARDC complaint filed against Gooch is available online at this link:

[2023-10-31_ARDC Complaint_THOMAS W GOOCH-SABINA WALCZYK.pdf^a](#)

In an attempt to rectify what Gooch and the Clinton Law Firm did to Dulberg, Dulberg filed case 22L010905.

We recently sent a reply email to ARDC Administrator Lea Gutierrez (attached to this letter as "Attachment 1"). The email contained a list of 4 documents filed in case 22L010905 which describe in detail what Talarico intentionally did to Dulberg during 22L010905, and which are reproduced here:

[2025-02-24_2022L010905_Dulberg Response to ADR Petition for fees with Exhibits-File Stamped.pdf^b](#)

[2025-03-17_COURT APPROVED SUPPLEMENT TO DULBERGS RESPONSE TO ADRS PETITION FOR AN AWARD OF ATTORNEYS FEES AND COSTS with Exhibits_File Stamped.pdf^c](#)

[2025-05-20_MOTION TO RECONSIDER APRIL 22 2025 FINAL ORDER BASED ON MISTAKES IN LAW_Exhibits-Filestamped.pdf^d](#)

[2025-07-11_DULBERGS RESPONSE TO TALARICOS MOTION TO UNSEAL with exhibits-FS 2025-07-14.pdf^e](#)

Around one year before submitting these documents we provided the ARDC with the same information that is in the court documents linked above (which describes what Talarico did to Dulberg in 22L010905) in the form of a video series sent to the ARDC and made available to the general public:^f

[The revenge of the network 1- Simplest frivolous lawsuit template.mp4](#)

[The revenge of the network 2- Setting the target up for sanctions and loss of home using frivolous lawsuit templates.mp4](#)

[The revenge of the network 3- Trapping target in single issue frivolous lawsuit dead end pathways as they desparately struggle to escape.mp4](#)

[The revenge of the network 4- Stripping claims against Baudins and Olsen using No Past No Future and Burial of troublesome issues.mp4](#)

[The revenge of the network 5- Why reverse engineering to pathway point of origin is essential.mp4](#)

[The revenge of the network 6- Talaricos Grand finale of sabotages.mp4](#)

[The revenge of the network 7- Discovery of forgeries and Judge-defendant friendship.mp4](#)

[The revenge of the network 8- Upstream, downstream and parallel sabotages.mp4](#)

[The revenge of the network 9- Downstream ambush and sabotage on ADR Systems pathway.mp4](#)

[The revenge of the network 10- The many ways we tried to raise issues of forgery and fraud on all pathways.mp4](#)

[The revenge of the network 11- Multi-sabotage of all appeal pathways.mp4](#)

Concerning the actions of Gooch in case 17LA377, the actions of all 3 law firms (Gooch, Clinton and Williams and Talarico) retained by Dulberg in 17LA377 are described in detail and were provided to the ARDC and to the general public in this video series: ^f

[Being targeted by an attorney network 1- Targeted by ones own retained attorneys.mp4](#)

[Being targeted by an attorney network 2- The network and the system.mp4](#)

[Being targeted by an attorney network 3- Legal malpractice system of protection.mp4](#)

[Being targeted by an attorney network 4- Simplest way to sabotage targets legal malpractice complaints.mp4](#)

[Being targeted by an attorney network 5- Networks of collaborating attorneys can be mapped.mp4](#)

[Being targeted by an attorney network 6- The escape hatch and cover stories.mp4](#)

[Being targeted by an attorney network 7- A system of suppression.mp4](#)

[Being targeted by an attorney network 8- Targeting emails.mp4](#)

[Being targeted by an attorney network 9- Burial of key evidence.mp4](#)

[Being targeted by an attorney network 10- Reverse engineering the system of suppression.mp4](#)

[Being targeted by an attorney network 11- How the target receives Bates numbered documents.mp4](#)

[Being targeted by an attorney network 12- Decoys to lock out key evidence and finish the victim off.mp4](#)

[Being targeted by an attorney network 13- Hoarding and sitting on key evidence and evidence of fraud.mp4](#)

[Being targeted by an attorney network 14- The legal malpractice team targeting a client.mp4](#)

Additionally, the ways by which Talarico intentionally destroyed Dulberg's attempts to appeal both 17LA377 and 22L010905 decisions was provided to the ARDC and to the general public in this video series: ^f

[The steering of any appeal into a ditch 1- Using unequal knowledge to quickly finish off permanently disabled target.mp4](#)

[The steering of any appeal into a ditch 2- Setting up target to loose race against time.mp4](#)

[The steering of any appeal into a ditch 3- Talarico becomes the new decoy to distract from the network and system.mp4](#)

[The steering of any appeal into a ditch 4- Talarico Higher Court sabotage maps.mp4](#)

Even though all this information was provided to the ARDC, on January 14, 2025 the ARDC wrote a [2 page final decision](#)^g which claimed that Talarico did nothing wrong in cases 17LA377 and 22L010905 and which basically walked around and ignored our evidence which document Talarico's actions.

Talarico was Dulberg's only retained attorney for 22L010905 and Talarico was Dulberg's third and final retained attorney for 17LA377. Yet Talarico was found to do nothing wrong by the ARDC in both cases.

A SIMPLE WAY TO SEE HOW GOOCH (AND CLINTON AND WILLIAMS AND TALARICO) TARGETED DULBERG IN CASE 17LA377

Beginning on the next page of this pdf and extending 3 pages (on pages 4, 5 and 6) a key secondary legal source “Trial Handbook for Illinois Lawyers” Chapter 22 Section 29 is reproduced, but we have added red, blue, purple and green underlines to highlight certain key statements. “Trial Handbook for Illinois Lawyers” (8th edition), has been available since 1964 and is a key secondary source which is available through Westlaw. The section on attorney professional misconduct is only 3 pages long. It is not credible that Gooch and Clinton and Williams and Talarico were not aware of the contents of “Trial Handbook for Illinois Lawyers” since it has been available to them probably during their entire careers as Illinois lawyers.

The underlined statements on pages 4, 5 and 6 help us clearly see how Gooch (and Clinton and Williams) intentionally targeted Dulberg.

The statements underlined in **red** go to the heart of the requirements for legal sufficiency for a legal malpractice claim in Illinois.

The statements underlined in **blue** go to the heart of how to calculate the Statute of Limitations in a legal malpractice case in Illinois.

The statement underlined in **green** describes actions which are considered to be prima facie professional misconduct by an attorney in Illinois.

The statements underlined in **purple** describe conditions under which an attorney may not liable for negligent actions they commit toward their client in Illinois.

Gooch targeted his client Dulberg by intentionally filing complaints in case 17LA377 that were not legally sufficient according to the minimum standards described in the statements underlined in **red**. Gooch also intentionally misadvised his client Dulberg how to calculate the Statute of Limitations by deliberately misinterpreting the statements underlined in **blue**.

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1 Trial Handbook for Illinois Lawyers - Civil § 22:29 (8th ed.)

Trial Handbook for Illinois Lawyers - Civil | September 2023 Update
Robert S. Hunter^a, Hon. Mark A. Schuering (Ret.)^a, Julie Schuering Schuetz^a

Chapter 22. The Burden of Proof and of Proving Specific Causes and Facts in Certain Cases

§ 22:29. Legal malpractice

Trial Strategy

Actions Against Attorneys for Professional Negligence, 14 Am. Jur. Trials 265

In any legal malpractice action, a plaintiff must plead the existence of a valid underlying cause of action. Four elements must be alleged and proven: (1) the existence of an attorney-client relationship that establishes a duty on the part of the attorney, (2) a negligent act or omission that breached that duty, (3) proximate cause that establishes that but for the attorney's negligence plaintiff would not have suffered an injury, and (4) damages. Because a plaintiff must establish that but for the attorney's negligence he would have been successful in the underlying action, he is required to prove a case within a case, that is, establish a prima facie case in the underlying action, and then prove it, in order to prove the legal malpractice case. This is required because of the damages element of the action. No malpractice exists unless counsel's negligence has resulted in the loss of an underlying action. *Sheppard v. Krol*, 218 Ill. App. 3d 254, 161 Ill. Dec. 85, 578 N.E.2d 212 (1st Dist. 1991).

When an attorney's negligence is alleged to have occurred during the representation of a client in the underlying action, and the underlying action never reached trial because of that negligence, the plaintiff is required to prove counsel's negligence was the proximate cause that resulted in the loss of the underlying action. If the underlying action remained actionable following the discharge of the former attorney, then the plaintiff can prove no set of facts that connect the defendant's conduct with damages sustained as a result of the defendant's negligence. *Cedeno v. Gumbiner*, 347 Ill. App. 3d 169, 282 Ill. Dec. 600, 806 N.E.2d 1188 (1st Dist. 2004).

It is prima facie negligent conduct for an attorney to misadvise a client on a settled point of law that can be looked up by the means of ordinary research techniques. Where there are successive negligent actors, the negligence of the second actor, under certain circumstances, may be deemed a superseding cause, relieving the original negligent actor of liability, as a matter of law. A former client's consultation with a new attorney, regarding possible representation in a wrongful death suit, did not constitute a superseding cause that relieved the former law firm of liability in legal malpractice action for providing client with wrong information concerning the statute of limitations when the firm terminated its representation, where the new attorney did not undertake any representation of the client and had no duty to inform client of the exact amount of time remaining on the limitations period. *Lopez v. Clifford Law Offices, P.C.*, 362 Ill. App. 3d 969, 299 Ill. Dec. 53, 841 N.E.2d 465 (1st Dist. 2005).

The injury in a legal malpractice action is not a personal injury, nor is it the attorney's negligent act itself. Rather, it is a pecuniary injury to an intangible property interest caused by the lawyer's negligent act or omission. The fact that an attorney may have breached his duty of care is not, in itself, sufficient to sustain the client's legal malpractice cause of action. Even if negligence on the part of the attorney is established, no action will lie against the attorney unless that negligence proximately caused damage to the client. The existence of actual damages is therefore essential to a viable cause of action for legal malpractice. Where the alleged legal malpractice involves litigation, no actionable claim exists unless the attorney's

negligence resulted in the loss of an underlying cause of action. If an underlying action never reached trial because of the attorney's negligence, the plaintiff in a legal malpractice action is required to prove that, but for the attorney's negligence, the plaintiff would have been successful in that underlying action. *Tri-G, Inc. v. Burke, Bosselman & Weaver*, 222 Ill. 2d 218, 305 Ill. Dec. 584, 856 N.E.2d 389 (2006).

In a legal malpractice action by a former wife against attorneys who represented her in a divorce action, the evidence was insufficient to establish that the former wife was damaged as a result of the attorneys' alleged failure to conduct proper discovery and to obtain an expert witness to value the former husband's interest in his law firm, where the attorney expert testifying for the attorneys stated that they did not breach their standard of care in not hiring such an expert, the former wife's expert admitted he had not reviewed the record of the divorce action, and the former wife failed to present any concrete evidence that she would have received more than the \$2.07 million in assets and the \$1,033,747 in a nonmodifiable maintenance that she agreed to accept in settlement of divorce action, after she terminated the attorneys and obtained substitute counsel, had she not settled out of court. *Weisman v. Schiller, Ducanto and Fleck, Ltd.*, 368 Ill. App. 3d 41, 306 Ill. Dec. 29, 856 N.E.2d 1124 (1st Dist. 2006).

A legal malpractice action filed before one plaintiff turned 18 and within six years of the date on which a second plaintiff reached the age of majority was timely filed as to those two plaintiffs but, unless some other tolling provision or exception applied, was untimely as to the remaining two plaintiffs, both of whom turned 18 more than six years before the action was filed. Fraudulent concealment is ground for tolling statutes of repose, including the statute of repose for legal malpractice. A fiduciary who is silent, and thus fails to fulfill his duty to disclose material facts concerning the existence of a cause of action, has fraudulently concealed that action, as would toll the statutes of limitations and repose, even without affirmative acts or representations. 735 ILCS 5/13-215; *DeLuna v. Burciaga*, 223 Ill. 2d 49, 306 Ill. Dec. 136, 857 N.E.2d 229 (2006).

Damages are not presumed in a legal malpractice case. The plaintiff bears the burden of proving that she suffered damages as a result of the attorney's negligence. In a legal malpractice action against the attorney who represented a minor's guardianship estate in the underlying medical malpractice action relating to injuries that the minor suffered at birth, which action alleged the attorney's failure to communicate to the guardian a \$1 million pretrial settlement offer by the defense in the underlying case, the estate was required to prove, for purposes of the proximate cause element of the legal malpractice claim, that in the underlying action the trial court would have approved the settlement on the minor's behalf. The failure of the attorney who represented the minor's guardianship estate in the underlying medical malpractice action relating to minor's injuries at birth, to inform the guardian of the \$1 million pretrial settlement offer before the attorney rejected the offer, was the proximate cause of the injury to the estate, as an element of the legal malpractice, because in the underlying action, the trial court would have approved of the pretrial settlement on the minor's behalf, where the settlement amount was adequate, in the light of weaknesses in the medical malpractice case, the adverse evidentiary rulings, the risk that the jury would find no medical malpractice, and the motivation of the minor's mother, which was "[n]ot the money" but rather to "go after the doctor so he couldn't do it to another baby." 755 ILCS 5/19-8. *First Nat. Bank of LaGrange v. Lowrey*, 375 Ill. App. 3d 181, 313 Ill. Dec. 464, 872 N.E.2d 447 (1st Dist. 2007).

To establish proximate cause in a legal malpractice action the plaintiff must essentially prove a case within a case, which means that but for the attorney's negligence, the plaintiff would have prevailed in the underlying action. Sufficient evidence in a client's legal malpractice action against her attorneys and the law firm that represented her, in a slip-and-fall lawsuit against her landlord, supported the conclusion that the client would not have prevailed in the slip-and-fall lawsuit, so as to support the jury's verdict in favor of the attorneys and the law firm, where the client did not know whether the gutters on her apartment building were leaking at the spot where she slipped on ice, either before or on the day of the accident, and such ice could have formed as a result of natural accumulation. *Orzel v. Szewczyk*, 391 Ill. App. 3d 283, 330 Ill. Dec. 381, 908 N.E.2d 569 (1st Dist. 2009).

To prove the proximate cause element in a legal malpractice action, the client must demonstrate that but for the attorney's negligence, it would have succeeded in the underlying lawsuit, which requires that the client litigate a case within a case. *Magnetek, Inc. v. Kirkland and Ellis, LLP*, 2011 IL App (1st) 101067, 352 Ill. Dec. 720, 954 N.E.2d 803 (App. Ct. 1st Dist. 2011).

In a legal malpractice action, a client is not considered "injured," as would trigger an accrual of a claim, unless and until he has suffered a loss for which monetary damages may be sought. Where an attorney's negligence allegedly occurred during

the attorney's representation of a client in an underlying litigation, the injury does not accrue and the statute of limitations does not begin to run on a claim for legal malpractice until the judgment or settlement or dismissal of the underlying action. Merely hiring new counsel to defend against the lawsuit challenging the attorney's legal advice and incurring fees does not, standing alone, trigger a cause of action for malpractice and an accrual of the limitations period for an action. A client's payment of attorney fees to new counsel in an underlying action in which a vendor to the clients' business sued clients for a breach of fiduciary duty did not constitute an "injury" that would trigger the accrual of the clients' action against the prior attorney and law firm for legal malpractice. Even though, at same time the trial court voiced its opinion that the prior attorney's representation constituted malpractice. At the time of payment of fees to new counsel, an underlying action had not yet ended adversely to the clients. 735 ILCS 5/13-214.3(b). *Suburban Real Estate Services, Inc. v. Carlson*, 2022 IL 126935, 456 Ill. Dec. 779, 193 N.E.3d 1187 (Ill. 2022).

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Footnotes

^{a0} *Formerly Circuit Judge of the Eighth Judicial Circuit of Illinois.*

^{a1} Member of the Illinois Bar. *Eighth Judicial Circuit of Illinois.*

^{a2} Member of the Illinois Bar.

End of Document

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Gooch knowingly and intentionally wrote the 17LA377 Complaint and Amended Complaint to fail the minimum standard for legal sufficiency described in the statements underlined in **red**. Gooch knowingly and intentionally refused to write a complaint on Dulberg's behalf that would be legally sufficient and could therefore be accepted by the court.

Gooch also knowingly and intentionally misinformed Dulberg how to calculate the Statute of Limitations by deliberately misrepresenting statements underlined in **blue** to his client. In fact, case 17LA377 was ultimately dismissed on a Motion for Summary Judgement using the same intentionally misrepresented calculation of the Statute of Limitations that both Gooch and Clinton and Williams intentionally placed in Dulberg's filed complaints.

The statement underlined in **green** gives a clear and concise description of what Gooch did to Dulberg and is reproduced below:

It is prima facie negligent conduct for an attorney to misadvise a client on a settled point of law that can be looked up by the means of ordinary research techniques.

When Gooch knowingly and intentionally filed both the Complaint and Amended Complaint that was legally insufficient while insisting to Dulberg that the complaints were legally sufficient, Gooch committed willful and wanton prima facie professional misconduct because Gooch intentionally misadvised Dulberg, his client, on a settled point of law that could be looked up by the means of ordinary research techniques.

And when Gooch knowingly and intentionally misinformed Dulberg how to calculate the Statute of Limitations, Gooch once again committed willful and wanton prima facie professional misconduct because Gooch was intentionally misadvising Dulberg, his client, on a settled point of law that could be looked up by the means of ordinary research techniques.

When Clinton and Williams also knowingly and intentionally misinformed Dulberg how to calculate the Statute of Limitations, Clinton and Williams also committed willful and wanton prima facie professional misconduct because Clinton and Williams were intentionally misadvising Dulberg, their client, on a settled point of law that could be looked up by the means of ordinary research techniques.

On the next page a Table named "LOCKED-IN HIDDEN STRATEGY IN 17LA377" is placed in order to help show the reader the underlying hidden strategy that Gooch, and then Clinton and Williams, and then Talarico followed in succession to intentionally destroy Dulbergs claims against actual and potential defendants in 17LA377.

LOCKED-IN HIDDEN STRATEGY IN 17LA377

	GOOCH-WALCZYK	CLINTON-WILLIAMS	TALARICO
1) Mess up red (in this source)	X		
2) Mess up blue (in this source)	X	X	
3) Avoid green (bankruptcy)	X	X	X
4) Avoid defendant Gagnon's admission of negligence for Dulberg's injury	X	X	X
5) Single issue, single defendant claim (McGuire settlement, Mast)	X	X	X
6) Bury key evidence around single issue (Tilschner v Spangler here and here and here)	X	X	X
7) Plant statements on record purportedly made by Dulberg (here and here and here)	X	X	X

In reaction to Dulberg informing Clinton-Williams of “overwhelming” and “smoking gun” evidence of intentional tort on July 8, 2019:

	CLINTON-WILLIAMS	TALARICO
8) Bury evidence of intentional tort around single issue (here)	X	X

In reaction to Talarico informing Dulberg that presiding Judge Meyer (who was also presiding Judge in underlying case 12LA178) was personal friends with defendant Popovich:

	TALARICO
9) Bury evidence of friendship between presiding Judge and defendant Popovich	X

In reaction to discovering forged signatures:

	TALARICO
10) Bury evidence of forgeries and evidence that at least 9 out of 10 depositions have no valid certification pages	X

In reaction to being informed of the sophisticated system of document and information suppression used by Clinton-Williams to target Dulberg and collaboration with opposing counsel:

	TALARICO
11) Bury evidence of a sophisticated system of document and information suppression used by Clinton-Williams against Dulberg and collaboration with opposing counsel Flynn	X

The pattern of “X” marks in the Table “LOCKED-IN HIDDEN STRATEGY IN 17LA377” reveals a planned strategy through 3 successive law firms retained by Dulberg to systematically and deliberately destroy Dulberg’s claims against all actual and potential defendants in 17LA377 while the law firms conceal their actions and shield themselves from liability for deliberately targeting their client Dulberg.

When Dulberg attempted to raise issues concerning underlying cases 12LA178 and BK 14-83578 by filing case 22L010905, Talarico systematically and methodically destroyed all claims against actual and potential defendants in case 22L010905 as is described in court documents listed and linked earlier (on page 1).

The process of destroying Dulberg’s claims in 17LA377 began with Gooch, who intentionally misrepresented the statements in “Trial Handbook for Illinois Lawyers” chapter 29, section 22 underlined in **red** (about legal sufficiency) and underlined in **blue** (about calculating Statute of Limitations) to Dulberg. This is how Gooch intentionally guaranteed that the 17LA377 Complaint and First Amended Complaint would both be rejected by the court for being legally insufficient. Gooch never filed (intentionally refused to file) a legally sufficient complaint on behalf of Dulberg.

The process continued through Clinton and Williams, who intentionally continued and extended Gooch’s original intentional misrepresentation of the statements in “Trial Handbook for Illinois Lawyers” Chapter 29, Section 22 underlined in **blue** (about calculating Statute of Limitations) when filing the Second Amended Complaint. The Second Amended Complaint was accepted by the court because Clinton and Williams addressed the statements underlined in **red** (concerning legal sufficiency) but the Second Amended Complaint was intentionally crafted by Clinton and Williams with the same misrepresentation of the statements underlined in **blue** (of how to calculate statute of limitations) that Gooch placed in the original Complaint and the First Amended Complaint.

The ARDC was provided with [Table 4a and Table 4b^h](#) in our ARDC complaint against Gooch (linkable from page 1 of the ARDC complaint), which contains all statements by both Gooch and Clinton and Williams in the Complaint, First Amended Complaint and Second Amended Complaint on how Gooch, Clinton and Williams determined the calculation of Statute of Limitations in 17LA377.

In fact, case 17LA377 was ultimately dismissed on a Motion for Summary Judgement using the same intentionally misrepresented calculation of the Statute of Limitations that both Gooch and Clinton and Williams intentionally placed in Dulberg’s filed complaints. The ARDC was provided with [Table 7ⁱ](#) in our ARDC complaint against Gooch (linkable from page 1 of the ARDC complaint), which contains all statements by the presiding Judge Thomas Meyer (who presided over both 17LA377 and underlying case 12LA178), Judge Joel Berg (who presided in case 17LA377 for only 1 day to issue the final order granting the Summary Judgment and dismissing the case) and opposing counsel Flynn on how to calculate the Statute of Limitations in case 17LA377.

And on November 1, 2023 (in their [response to the ARDC complaint against them^j](#)) Clinton and Williams again cited the same intentionally deceptive and incorrect legal theory about calculating the Statute of Limitations in 17LA377, this time to the ARDC and the Illinois Supreme Court.

And amazingly, the ARDC investigator who made the final decision concerning the ARDC complaint we filed against Clinton and Williams simply repeated the same legal theory of how to calculate the Statute of Limitations in 17LA377 that Gooch and Clinton and Williams intentionally placed in the 17LA377 court record for the purpose of destroying any claims Dulberg had against any actual or potential defendants.

After we submitted an [ARDC Complaint against Clinton and Williams^k](#) as a 143 page set of claims backed by over 34 Gigabytes of exhibits and supporting evidence (via a thumbdrive and direct links online), we received a [final response from the ARDC concerning Clinton and Williams^l](#) that walked around and ignored most every claim we made to the ARDC (which are clearly visible on page 1 of the complaint). Of the single issue the final decision addressed (which is section 2A of the complaint on bankruptcy), the letter misstated the following 7

facts about Dulberg's bankruptcy:

- 1) Moved bankruptcy filing date up about 22 months
- 2) 'Deleted' bankruptcy trustee Heeg and invented the term "the trustee" to refer only to trustee Joseph Olsen.
- 3) Claimed Dulberg gave consent to binding mediation
- 4) Ignored fact that defendant Gagnon admitting negligence for Dulberg's injury as early as March, 2013
- 5) Ignored Dulberg's status as sole residual beneficiary of the bankruptcy estate since all creditors were paid in full
- 6) All inherited actions (at least 9 out of 10 depositions in underlying case 12LA178 have no valid certification page or forgeries of court reporter signatures attached, burial of key evidence, ect)
- 7) Ignored reason Dulberg declared bankruptcy

The ARDC investigator cited a provably incorrect legal theory (concerning the statements underlined in [blue](#) on pages 4, 5 and 6) when making a final decision concerning any claim against the actions of Clinton and Williams carrying the authority of the Illinois Supreme Court. They also walked around and ignored most every issue we raised in our ARDC Complaint while only focusing on section 2A (concerning bankruptcy) of our claims, and then they misrepresented the listed 7 features of bankruptcy and used a provably incorrect Statue of Limitations legal theory (when compared to the statements underlined in [blue](#) on pages 4, 5 and 6). Using this reasoning, the ARDC decided Clinton and Williams did nothing wrong in 17LA377.

Concerning items 3, 4, and 5 listed in the Table "LOCKED-IN HIDDEN STRATEGY IN 17LA377", the very purpose of filing 22L010905 was to raise these issues (concernng the forced Gagnon settlement, the \$300,000 "upper cap" placed on the settlement and what happened in bankruptcy) that were being ignored in 17LA377.

We provided evidence for the many acts of willful and wanton prima facie professional misconduct committed by Talarico against Dulberg in 22L010905 in our [February 24, 2025 submission^b](#) and [March 17, 2025 submission^c](#) and [May 20, 2025 submission^d](#) to the court in case 22L010905. These acts took place over 3 successive time periods over about 30 months and included at least 5 separate, unique and identifiable stages of intentional lying by our retained attorney Talarico.

5 separate and distinct acts of sabotage were necessary for Talarico to secure a sanctions punishment against his permanently disabled client in 22L010905. Talarico had to: (1) Establish "breach of contract" claims, (2) refuse to file the Amended Complaint written by his clients and given to him, (3) establish a sanctions claim, (4) secure the sanctions claim and (5) destroy any appeal attempt.

That is what Talarico intentionally did to Dulberg when he tried to raise any claim about what happened to him during bankruptcy and the forced Gagnon settlement in 12LA178 and BK 14-83578.

Just as Gooch was the first of 3 law firms to intentionally destroy any claims Dulberg had against actual and potential defendants in 17LA377, so Talarico was the law firm to intentionally destroy any claims Dulberg had against actual and potential defendants in 22L010905.

Item 6 in the Table "LOCKED-IN HIDDEN STRATEGY IN 17LA377", the burial of key evidence, is examined later in this document (on page 19).

Item 7 in the Table "LOCKED-IN HIDDEN STRATEGY IN 17LA377" is "place statements on the record purportedly made by Dulberg" and linked examples are given. The ARDC was provided with [Table 3^m](#) in our ARDC complaint against Gooch (linkable from page 1 of the ARDC complaint), which contains 5 factually untrue statements of how a \$300,000 "upper cap" came to be placed on Dulberg's claims against Gagnon from June 13, 2016 to August 11, 2016 (Gagnon already admitted negligence for Dulberg's chainsaw injury as early as March, 2013).

All 5 statements in [Table 3^m](#) were made by Gooch and Clinton and Williams (on Dulberg's behalf) and placed in the 17LA377 common law record to be deliberately contrary to fact. Gooch and Clinton and Williams must have known that the \$300, 000 "upper cap" was placed on Dulberg's claim against Gagnon from June 13, 2016 to August 11, 2016 by Allstate and the Baudins in front of Judge Meyer in 12LA178 because the placement is

clearly described in 12LA178 court transcripts and because Dulberg informed Gooch and Clinton and Williams repeatedly that Dulberg never signed the binding mediation agreement and refused to ever agree to participate in any binding mediation process. The ARDC was also provided with the June 13, 2016 to August 11, 2016 transcript quotes and transcripts (as exhibits) in our [ARDC Complaint against Gooch](#) and our [ARDC Complaint against the Baudins](#) and our [ARDC Complaint against Clinton and Williams](#).

HOW GOOCH AND CLINTON AND WILLIAMS AND TALARICO CAN GET AWAY WITH INTENTIONALLY DESTROYING DULBERG’S CLAIMS IN CASES 17LA377 AND 22L010905

The statements in “Trial Handbook for Illinois Lawyers” Chapter 29, Section 22 underlined in **purple** are reproduced below:

“If the underlying action remained actionable following the discharge of the former attorney, then the plaintiff can prove no set of facts that connect the defendant’s conduct with damages sustained as a result of the defendant’s negligence”.

and:

“When there are successive negligent actors, the negligence of the second actor, under certain circumstances, may be deemed a superseding cause, relieving the original negligent actor of liability, as a matter of law.”

Those who intentionally planned the strategy shown by the pattern of “x” marks in the Table “LOCKED-IN HIDDEN STRATEGY IN 17LA377” (on page 8) most probably knowingly planned to use the statements in “Trial Handbook for Illinois Lawyers” Chapter 29, Section 22 underlined in **purple** (in the above quotes) and related case laws to evade any legal consequences for what they did to Dulberg. They could claim:

“Dulberg had separate legal counsel who represented him after we withdrew.”

“If there had been legal malpractice, then Dulberg had counsel who could have advised him of his rights, with the applicable statute of limitations.”

Talarico is currently preparing to use the same ARDC [2 page final decision](#) concerning Talarico’s actions in cases 17LA377 and 22L010905 to claim Talarico has no responsibility for the sanctioned acts that he deliberately caused in 22L010905. Talarico will probably use case law reproduced below to claim Talarico bears no responsibility for the sanctions in case 22L010905 that he deliberately caused:

1. *Metzger v. Brotman*, 2021 IL App (1st) 201218 states:

“...it is undisputed that in Illinois, our supreme court has the inherent power to discipline attorneys who have been admitted to practice before it. Skolnick, 191 Ill. 2d at 229. Illinois treats attorney discipline as an exclusively judicial function under the Illinois Constitution’s separation of powers clause. In re Day, 181 Ill. 73, 96 (1899). The court, in turn, has delegated the authority to investigate and prosecute claims of attorney misconduct to the ARDC. Skolnick, 191 Ill. 2d at 229. The ARDC’s duties, structure, and authority derive exclusively from rules of the Illinois Supreme Court, and the ARDC is not a state agency. Chicago Bar Ass’n v. Cronson, 183 Ill. App. 3d 710, 720 (1989). Moreover, the ARDC and its various officers serve only as agents of the supreme court in administering the disciplinary functions that have been delegated to them. In re Mitani, 75 Ill. 2d 118, 123-24 (1979). Attorney disciplinary proceedings are conducted by the ARDC completely separate and apart from judicial proceedings in which the alleged attorney misconduct occurred (Reed Yates Farms, Inc. v. Yates, 172 Ill. App. 3d 519, 530 (1988)), and any sanctions based on alleged professional misconduct must be addressed by the ARDC and not by the trial court (Schnack v. Crumley, 103 Ill. App. 3d 1000, 1007 (1982)). Additionally, recommendations made by the ARDC’s hearing board are merely advisory, and the supreme court retains the ultimate responsibility for imposing discipline on attorneys. In re Mulroe, 2011 IL 111378, ¶ 25. Courts other than the supreme court may adjudicate matters touching on attorney discipline only when acting as agents of the supreme court upon direct order of that court. Lustig v. Horn, 315 Ill. App. 3d 319, 328 (2000) (citing Ettinger v. Rolewick, 140 Ill. App. 3d 295 (1986)).”

Exactly like Talarico is currently claiming in 22L010905 (concerning a frivolous lawsuit sanction that has been ordered against Talarico and Dulberg on December 17, 2024 and April 22, 2025), that Talarico is not responsible for any harm done because Talarico was dismissed from an ARDC complaint against him in a 2 page letter from the ARDC, so both Clinton and Williams (and later Gooch) could also claim that they, too, have no liability for anything they did to Dulberg if Dulberg attempts to file an Illinois state or federal claim against them.

Clinton and Williams (who were both dismissed from the ARDC complaints against them already) can also use the letters they now have from ARDC investigators (which act as final decisions carrying the authority of the

Illinois Supreme Court) to claim they have no responsibility for anything they did to Dulberg because they were “already investigated” concerning the same charges and were found by the ARDC (and therefore the Illinois Supreme Court) to have done nothing wrong.

ALL OF OUR STATED CLAIMS AGAINST GOOCH, CLINTON AND WILLIAMS AND TALARICO ARE SUPPORTED BY EVIDENCE

To be as clear in our stated position as we possibly can be, we provided the ARDC and the general public with explanations backed by evidence as to why the ARDC final decisions regarding Popovich and Mast (of the underlying case) and Clinton and Williams contained multiple errors and omissions in the following video series: ^f

[Illinois response to being informed of attorney network 1- Rebuttal of ARDC decision regarding Popovich and Mast.mp4](#)

[Illinois response to being informed of attorney network 2- Rebuttal of ARDC decision regarding Clinton-Williams.mp4](#)

[Illinois response to being informed of attorney network 3- Rebuttal of ARDC decision regarding Flynn et al complaints Part 1.mp4](#)

[Illinois response to being informed of attorney network 4- Rebuttal of ARDC decision regarding Flynn et al complaints Part 2.mp4](#)

[Illinois response to being informed of attorney network 5- No fraud or collaboration of opposing counsels is acknowledged to exist by ARDC.mp4](#)

[Illinois response to being informed of attorney network 6- Another way to interpret entirety of ARDC logic.mp4](#)

[Illinois response to being informed of attorney network 7- Legal malpractice system of protection possibly under ARDC stand down protection.mp4](#)

[Illinois response to being informed of attorney network 8- Attorneys pile on while ARDC stands down a win-win for all but the victim.mp4](#)

[Illinois response to being informed of attorney network 9- Lady Justice blind to Magicians of ignorance bleeding out a victim.mp4](#)

[Illinois response to being informed of attorney network 10- Walking around the chronological record and word replacement.mp4](#)

[Illinois response to being informed of attorney network 11- Why we began to make video records of events.mp4](#)

[Illinois response to being informed of attorney network 12- Valid questions of accident or intentionality.mp4](#)

[Illinois response to being informed of attorney network 13- The chronological record is a life raft.mp4](#)

To be as clear in our stated position as we can possibly be on the many ways which Talarico intentionally lied to the ARDC (and by extension the Illinois Supreme Court) in Talarico’s Response to the ARDC complaint we filed against him, we sent the following video explanations supported by exhibits to the ARDC and made the same available to the general public: ^f

[Illinois response to being informed of attorney network 14- Overview of Talarico response.mp4](#)

[Illinois response to being informed of attorney network 15- The 2 theories and writing your own passport.mp4](#)

[Illinois response to being informed of attorney network 16- Using timelines and communications records to spot logical poverty.mp4](#)

[Illinois response to being informed of attorney network 17- Theory 2 word replacement and passports and a new emerging reality consensus.mp4](#)

[Illinois response to being informed of attorney network 18- Using timelines and communications records to spot](#)

[more logical poverty and the sadness of the system.mp4](#)

[Illinois response to being informed of attorney network 19- Using timelines and communications records to spot more logical poverty.mp4](#)

[Illinois response to being informed of attorney network 20- Its all in Dulbergs mind.mp4](#)

[Illinois response to being informed of attorney network 21- Fact-find then flip into opposite then run.mp4](#)

[Illinois response to being informed of attorney network 22- Talarico fees compared to Talarico work product.mp4](#)

[Illinois response to being informed of attorney network 23- A clear explanation that anyone can understand.mp4](#)

There is no doubt that we explained to the ARDC in the videos linked above that the Baudins intentionally lied in their ARDC Response systematically and methodically. We also document much of the same deliberate lying to the ARDC (and by extension the Illinois Supreme Court) by Talarico in Sections A and B of this submission filed in 22L010905:

[2025-07-11_DULBERGS RESPONSE TO TALARICOS MOTION TO UNSEAL with exhibits-FS 2025-07-14.pdf^e](#)

To be as clear in our stated position concerning how the Baudins intentionally lied to the ARDC (and by extension the Illinois Supreme Court) in their Response to the ARDC complaint we filed against them as we can possibly be, we sent the following video explanations supported by exhibits to the ARDC and made the same available to the general public: ^f

[Illinois response to being informed of attorney network 24- Baudin ARDC response is intentionally engineered to deceive the reader.mp4](#)

[Illinois response to being informed of attorney network 25- Baudins intentionally delete trustee Heeg and invent sole trustee Olsen.mp4](#)

[Illinois response to being informed of attorney network 26- 7 intentional deceptions the Baudins make to the Illinois Supreme Court.mp4](#)

[Illinois response to being informed of attorney network 27-Evidence of collaboration between Talarico and Baudins to sabotage Dulbergs complaint filed on 12-8-2022.mp4](#)

[Illinois response to being informed of attorney network 28- Evidence Talarico allowed opposing parties to edit complaint before filing complaint on 12-8-2022.mp4](#)

There is no doubt that we explained to the ARDC in the videos linked above that the Baudins intentionally lied in their ARDC Response systematically and methodically.

We later realized that the [ARDC final decision concerning Clinton and Williams](#) that contained the 7 mistakes concerning bankruptcy was issued on February 27, 2024, which is **over 3 months before** the Baudins wrote their response to the ARDC (on June 7, 2024) in which the Baudins intentionally lied to the ARDC about the exact same 7 features. ARDC then based their final decision dismissing all claims against Clinton and Williams on the 7 bankruptcy misstatements and by walking around and ignoring all the other issues we raised in our complaint against Clinton and Williams (which are very visible on page 1 of the complaint).

To be as clear in our stated position concerning Gooch's Response to the ARDC complaint against him as we possibly can be, we sent the following video Reply (supported by exhibits) to Gooch's Response to the ARDC and made the same information available to the general public: ^f

[Illinois response to being informed of attorney network 29- Looking at all attorney ARDC responses together.mp4](#)

[Illinois response to being informed of attorney network 30- Discovering larger patterns in all attorney ARDC responses taken together.mp4](#)

[Illinois response to being informed of attorney network 31- Everyone messing up statements underlined in blue together.mp4](#)

[Illinois response to being informed of attorney network 32- How everyone interprets bankruptcy issues seen as a whole.mp4](#)

[Illinois response to being informed of attorney network 33- 7 important features moving through the whole system of information.mp4](#)

[Illinois response to being informed of attorney network 34- Locked-in hidden strategies of the network and the system.mp4](#)

[Illinois response to being informed of attorney network 35- How Gooch locks in the hidden strategy and isolates the permanently disabled target.mp4](#)

[Illinois response to being informed of attorney network 36- How Gooch locks in the hidden strategy and isolates the permanently disabled target continued.mp4](#)

And to be as clear in our stated position as we possibly can be about the many errors and omissions and the patterns of omissions in each and every ARDC final conclusion related to each and every ARDC complaint we have filed to date, we sent the following video explanations supported by exhibits to the ARDC and made the same available to the general public: ^f

[Illinois response to being informed of attorney network 37- Table of all attorney and ARDC responses.mp4](#)

[Illinois response to being informed of attorney network 38- Extreme features of the Table of all attorney and ARDC responses.mp4](#)

[Illinois response to being informed of attorney network 39- A system of walking around and bypassing information.mp4](#)

[Illinois response to being informed of attorney network 40- How an alternative reality is established to defend the attorney network.mp4](#)

[Illinois response to being informed of attorney network 41- Underlying patterns in all attorney and ARDC responses to date.mp4](#)

[Illinois response to being informed of attorney network 42- Straw Man argument format of all ARDC final decisions.mp4](#)

[Illinois response to being informed of attorney network 43- Overlays as toolsets to track attorney deception.mp4](#)

[Illinois response to being informed of attorney network 44- Twenty overlays show how attorney networks manipulate the chronological record together.mp4](#)

[Illinois response to being informed of attorney network 45- Mapping coordinated webs of lies and omissions by networks of attorneys.mp4](#)

[Illinois response to being informed of attorney network 46- Rules of the Legal Mouse Trap.mp4](#)

[Illinois response to being informed of attorney network 47- At least Dred Scott was given a reason why.mp4](#)

We have made available to the ARDC and to the general public around 100 videos which explain how a network of Illinois attorneys targeted Dulberg in underlying cases 12LA178 and BK 14-83578 and in cases 17LA377 and 22L010905 at this link: www.fraudonthecourt.net/video

We support all claims we make with over 34 Gygabytes of exhibits which we have made available to the ARDC (as a thumbdrive and online) and to the general public at this link: www.fraudonthecourt.net/exhibits

We did not make any accusation in our [ARDC Complaint against Thomas Gooch](#) or in our [ARDC Complaint against Edward Clinton and Julia Williams](#) or against Alphonse Talarico or in any of our close to 100 videos available online or in any of our filed court documents that is not supported by evidence.

IN CONTRAST, GOOCH AND TALARICO (AND CLINTON AND WILLIAMS) CAN MAKE *ANY OUTRAGEOUS CLAIM* ABOUT DULBERG AND KOST WHILE PROVIDING NO EVIDENCE (AND THEY CAN GET AWAY WITH IT)

For example, there is no evidence in the attorney-client email record between Dulberg and Talarico^o of any statements of an extreme and outrageous nature like the following:

“He often remarked to Mr. Talarico while litigating his numerous cases, that he will bring down the entire justice system in Illinois and that he and Mr. Talarico will make much money for the movie rights.” (Talarico’s ARDC Reponse, p4)

and again that:

Dulberg “avowed to bring down” the “Illinois Justice system”. (Talarico’s ARDC Reponse, p4)

Talarico stated a third time in the same document:

“He is blameless and the Illinois Justice system, which he avows to bring down” (Talarico’s ARDC Reponse, p4).

Talarico made these statements to the ARDC in his Response to our ARDC Complaint against him in which he repeated 3 times that Dulberg “avowed” to “bring down the Illinois Justice system”. There is no evidence of any statements of this nature in the entire attorney-client email communications (close to 2600 emails)¹ available to the public for any claim as crazy as the ones Talarico makes here. These are shockingly provocative statements for *any attorney* to make about their client with *no evidence* (since, apparently, Dulberg “avowed to bring down” the “Illinois Justice system” only over the phone to Talarico).

We asked the ARDC to subpoena the phone records and recorded telephone conversations between Talarico and Dulberg so we can prove that Talarico’s claims are crazy and that Talarico is lying but we were refused. We asked the presiding Judge in 22L010905 to allow us to subpoena the telephone conversations and phone records between Talarico and Dulberg to prove that Talarico is lying but we were refused.

Gooch invented an artificial, after-the-fact crisis over events of which there is no evidence in the communications records as we documented in detail in our [ARDC Complaint against Gooch](#), beginning on page 13, paragraph 93 and reproduce below:

1. On 10/2/2018 1:06 PM Thomas Gooch replied to Dulberg by email stating:²

“>

> Mr. Duhlberg;

>

> I have your attachment and am deeply offended by it.

>

> I more upset over being ordered to call you today. I am preparing for trial and frankly don’t have time to read or comment on your attempts to educate me on what legal malpractice is all about, I particularly don’t have time to read outdated cases on the elements of a legal malpractice case, nor do I have any intention of quoting the law you sent to me.

>

> You understand full well I’m sure that I have been doing this for a very long time, if I need help on understanding the law I will get from someone who knows how to do legal research, you and your

1 [Group Exhibit 50](#) All attorney-client email communication between Dulberg and Talarico and Kost and Talarico (about 2600 email files) are available online at this link:

[https://www.fraudonthecourt.net/exhibits/Group Exhibit 50_Dulberg-Talarico communication from October, 2020 onward/](https://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2050_Dulberg-Talarico%20communication%20from%20October,%202020%20onward/)

2 [Exhibit 122](#)_2018-08-31_Dulberg vs Law Offices of Thomas J Popovich PC et a.pdf

brother don't.

>

> If I have anymore of this authoritative comments or instructions I will have to give particular thought to withdrawing my appearance and letting you represent your self or find someone else, understand this is not an empty threat, I will tolerate any more of this. If I need a factual question answered and I'm sure I will in the course of this litigation then I will ask you but kindly stop with rudimentary research. The Google searches of you and your brother are not replacements for my law license.

>

> I generally don't have a problem with relatives helping out and being involved just so long as the client understands that the relatives involvement may waive the attorney client privilege. However at this point your brother has become more the problem then helpful. While I can not prevent him from injecting himself into your case through you, I am no longer willing to have him present at conferences or communicate directly with me.

>

> At this point with everything I have going and the attitude you are displaying I have serious doubts as continuing to represent you. Kindly do not communicate with my staff on the telephone in the manner you chose today

>

> Sincerely

>

> Thomas W Gooch"

2. Dulberg responded by email stating³,

"Hello Tom and Sabina, I didn't understand the last email I received so I need some clarification. I was never rude or not courteous to you staff and your staff was always courteous to me. Yesterday I talked with Nikki briefly just to confirm that the office received the email. She was friendly and courteous. I said nothing rude or offensive.

I never ordered you or anyone to call me yesterday. I honestly don't know why you believe I did. I was not aware there was anything offensive in the attachment I sent. As I read it again I still can't see anything offensive in it.

As you know I have a permanent disability. You may not know I am on medication to control pain and spasms and this medication does not allow me to focus on complex subjects to a prolonged time. Since I do not understand your last email and I don't have much time before appearing in court I need to know where I stand.

Are you thinking of not continuing to represent me in this case?

Are you going to submit a second amended complaint on October 10 and appear in court?

Will I be given enough time to review the complaint before it is submitted?

May I comment on it or request changes to it or ask questions about it?

I do not want to offend anyone, so I need to know what I can comment on or ask questions about.

I have no memory of any inappropriate behavior when talking to Nikki yesterday. Please let me know

3 [Exhibit 122_2018-08-31_Dulberg vs Law Offices of Thomas J Popovich PC et a.pdf](#)

how I can communicate with your staff or what I can include in an email in the future so you are not offended again.

Sorry if I did anything wrong. Sincerely, Paul Dulberg ”

3. On October 3, 2018 Gooch replied to Dulberg’s email point by point. Gooch responses are in red font. The email⁴ is reproduced:

“From: Thomas W. Gooch III goocho@goochfirm.com

Subject: RE: from tom

Date: October 3, 2018 at 12:56 PM

To: Paul Dulberg pdulberg@comcast.net

As you know I have a permanent disability. You may not know I am on medication to control pain and spasms and this medication does not allow me to focus on complex subjects for a prolonged time. Since I do not understand your last email and I don’t have much time before appearing in court I need to know where I stand.

You seem to have been very focused when you delivered to me your research notes on the elements of legal malpractice, not that I need the written lecture on what legal malpractice consists of

Are you thinking of not continuing to represent me in this case?

Yes I am considering withdrawing on your behalf. I need no research from you on legal malpractice answering my questions on facts is helpful when I ask. I want no more involvement from your brother, Obviously he can talk to you all you want, I can’t prevent that but if I perceive further interference from him then I will have to re-evaluate my continued ability to competently represent you. I will not allow him to be here in my office for any purpose. “

Are you going to submit a second amended complaint on October 10 and appear in court?

We may seek an extension, we appear on court dates as a general rule always. You do not and have not had any court dates that require your appearance.

Will I be given enough time to review the complaint before it is submitted?

When I determine the complaint is in my opinion legally sufficient it gets filed, naturally you will get a copy of it for your records.

May I comment on it or request changes to it or ask questions about it?

You, not your brother, can ask all the questions you wish. I generally do not ask a client if a complaint is legally sufficient, nor do I want a client drafting a complaint that I have to sign. Most clients do not know the difference between pleading conclusions of law or fact, pleading evidence or the correct pleading of ultimate material factual allegations. In as much as you have advised you are on pain medicine unable to “focus on complex subjects I question how much you could help in any event. I can get a lot done when I don’t have to answer emails like this one.

I do not want to offend anyone, so I need to know what I can comment on or ask questions about.

Making demands and lecturing me on the law are great ways to be offensive, likewise demanding to know when you will be called and comments about caring about anyone else we represent or other cases is not conducive to not offending us.

gooch”

4 [Exhibit 122_2018-08-31_Dulberg vs Law Offices of Thomas J Popovich PC et al.pdf](#)

Yet when we look at the contents of the [text document](#)⁵ that set Gooch off against Dulberg and Kost, there is nothing in the body of the [text document](#)^p which could possibly justify such a negative reaction by Gooch. Additionally, there is nothing in the communications records that Gooch could cite in support of his negative reaction.

Much more likely than not, Gooch reacted negatively because Gooch was (and is) basically caught “red-handed” or caught “with his pants down” committing willful and wanton prima facie professional misconduct against Dulberg by misadvising Dulberg about a settled point of law that could be looked up by the means of ordinary research techniques. The [red](#) underlined statements in “Trial Handbook for Illinois Lawyers” chapter 29 section 22 on pages 4, 5 and 6 (concerning legal sufficiency) states about the same thing that the [text document](#)^p also states. Gooch reacted so negatively and with so much drama to deflect from the fact that the contents of the [text document](#)^p Gooch was sent describe almost exactly what Gooch was required to do by Illinois law to correctly file a legally sufficient legal malpractice complaint.

All these comments to his client are further examples of Gooch committing willful and wanton prima facie professional misconduct because Gooch continued to misadvise Dulberg on a settled point of law that can be looked up by the means of ordinary research techniques even after he was caught “red handed” doing so.

Gooch, in his [response to the ARDC complaint we filed](#)^q against him, stated:

The commission needs to realize this complaint was not written by Mr. Dulberg but by his brother who interfered in this matter since “day one”. In support of this allegation, I refer to his email correspondence attached hereto as exhibit “C” where he comments on his disability and cognitive issues. I believe that email was written by his brother.

What Gooch calls “exhibit “C”” is the exact same email exchange we reproduced on the previous pages. The date of the email exchange is October 2, 2018 (days before Dulberg fired Gooch). We first met Gooch on December 16, 2016. This is what Gooch would call “day one”; the day we first met in his office. Gooch calls an email dated October 2, 2018 as “evidence of interference from “day one” (by citing evidence dated around 21 months after “day one”). Gooch is also claiming that Thomas Kost is pretending to be Dulberg in the reproduced email exchange.

Gooch also stated:

In this case from the first meeting his brother attended and with a strong will furnished his knowledge of malpractice and instructions on how I should proceed. The situation became untenable. I attach “Exhibits A to C” which illustrates what to me was the “final straw”. Exhibit “A” is my email to him voicing my frustrations with the email marked as “exhibit “B” with research attached created by his brother explaining to me how to properly file an amended complaint. I thought it typical but a bit too far and decided I was done dealing with his brother as reflected in Exhibit “A”. Thereafter I received “exhibit “C”” purportedly written by the client but actually by his brother and I immediately complied and withdrew furnishing him the withdrawal order.

Here Gooch uses the exact same October 2, 2018 email exchange Gooch just cited as evidence of interference on “day one”, this time as evidence of a “final straw” about 21 months later. And Gooch again stated:

I believe Mr. Clinton was let go and another firm took over until the matter was finally lost I suspect with the continued oversight and interference by the complainants brother.

Dulberg “finally lost” case 17LA377 because of the fake Statute of Limitations argument Gooch deliberately placed in the 17LA377 common law record (in Dulberg’s name) and because Clinton and Williams also deliberately placed in the record in Dulberg’s name as shown in the Table “LOCKED IN HIDDEN STRATEGY IN 17LA377” (on page 8). Gooch knowingly and intentionally wrote the 17LA377 Complaint and Amended

5 [Exhibit 123_2018-10-02_second_amended_complaint_comments.txt](#)

Complaint to fail the minimum standard for legal sufficiency, which is the statements underlined in **red** in “Trial handbook for Illinois Lawyers”, Chapter 29, Section 22 (on pages 4, 5 and 6). Gooch also knowingly and intentionally misinformed Dulberg how to calculate the Statute of Limitations by deliberately misrepresenting statements underlined in **blue** (on pages 4, 5 and 6) to his client. Gooch knows exactly how 17LA377 was “finally lost” because Gooch and Clinton and Williams deliberately set the Statute of Limitations argument up to lose.

There is no evidence for what Gooch claims in any communications records⁶. Thomas Kost never emailed Gooch. Thomas Kost never spoke to Gooch by phone.

Gooch and Clinton and Williams also deliberately suppressed and ‘buried’ key evidence in 17LA377, which was also necessary to destroy Dulberg’s claims. The [text document](#)⁹ that Gooch reacted to also informed Gooch about the key evidence of (a certified slip copy of an appellate court ruling in) the case Tilchner v Spangler. We informed Gooch for a second time of the importance of Tilschner v Spangler as key evidence in case 17LA377. TABLE 10 below lists the number of times that our retained attorneys Gooch and Clinton and Williams were informed in detail of the importance of Tilschner v Spangler as key evidence in case 17LA377. All documented examples are available for viewing through linked provided in the table.

TABLE 10: THE NUMBER OF TIMES DULBERG INFORMED GOOCH, CLINTON AND WILLIAMS ABOUT THE IMPORTANCE OF KEY EVIDENCE TILSCHNER V SPANGLER (with links to evidence)

When Informed		How Informed
2016-12-16	first meeting with Gooch	document handed Gooch
2018-10-01	letter to Gooch (that led to Gooch firing)	email linked (on page 30) attached document: second_amended_complaint_comments.txt
2018-10-10	preparing for first meeting with Clinton-Williams	email linked attached folder: Duberg Complaint document: second_amended_complaint_comments.txt
2018-10-12	first meeting with Clinton-Williams	Text document and problems with Gooch were explained at meeting ⁶
2018-12-04	preparing Second Amended Complaint	email linked attached documents: Working.pdf comment on complaint.txt
2018-12-05	preparing Second Amended Complaint	email linked attached document: comments on Dulberg Second Amended Complaint RED-LINED 2018 Dec .txt
2019-03-18	preparing discovery documents	email linked document: IndependantContractor-CaseLaw1_Mast.pdf
2019-07-08	inspecting defendants documents	email linked attached folder: To Julia documents: questions_for_mast.txt timeline_of_mcguire_settlement.txt
2019-07-22	inspecting defendants documents	email linked attached folder: To Julia documents: questions_for_mast.txt timeline_of_mcguire_settlement.txt
2019-11-19	updating information	email linked attached document: 2109-11-19_updated_timeline_of_mcguire_settlement.txt

⁶ On October 19, 2018 PDF files were created by Clinton or Williams in “Dulberg Master File” concerning the Tilschner case: Shown in [Visual Aid 4 - Tilschner hoax.png](#)

When Informed		How Informed
2020-02-06	preparing for Mast deposition	email linked attached documents: questions_for_mast.txt timeline_of_mcguire_settlement.txt
2020-02-08	preparing for Mast deposition	email linked attached documents: 2109-11-19_updated_timeline_of_mcguire_settlement.txt questions_for_mast.txt
2020-06-18	preparing for Mast deposition	email linked attached document: evidence_list.txt questions_for_mast.txt
2020-06-24	preparing for Mast deposition	email sent at 1:56AM linked attached documents: 2020-06-23_updated_timeline_of_mcguire_settlement.txt email sent at 10:05AM linked attached documents: 2020-06-23_updated_timeline_of_mcguire_settlement.txt
2020-06-24	meeting before Mast deposition	Clinton and Williams were told by Thomas Kost of the importance of Tilschner v Spangler in proving ‘intentional tort’ and ‘fraud’ during the meeting

How Clinton and Williams suppressed Dulberg’s key evidence Tilschner v Spangler is described in detail (step by step) in Section 2C of [‘ARDC Complaint Against Edward X. Clinton and Julia C. Williams’](#)⁷.

How the document Tilschner v Spangler in Mast deposition “exhibit 12” inexplicably went missing during the deposition of Hans Mast is described in detail in Section 2K of [‘ARDC Complaint Against Edward X. Clinton and Julia C. Williams’](#)⁸.

On November 04, 2022⁹ Williams was asked about the missing key evidence Tilschner v Spangler in “exhibit 12” (of the Mast deposition) in court. After 4 different subpoena responses related to exhibit 12 over the previous 3 months, and after being informed by Dulberg at least 6 different times in writing about the importance of Tilschner v Spangler, Williams claimed to not know the contents of exhibit 12. The following exchange took place in court:

“MS. WILLIAMS: ... So sometime after the deposition, we -- we did provide the exhibit that was utilized in the deposition to the court reporter, and at that time they marked it and sent it back to everyone.

THE COURT: Okay. What was Exhibit 12 again?

MS. WILLIAMS: It was a series of cases. I don’t know that -- I just can’t recall what all was asked about it, but I know there were -- it was -- it was --

THE COURT: All right. These would have --

MS. WILLIAMS: -- copies of case law.

THE COURT: All right.

MR. FLYNN: They were photocopies of the old books, Judge, cases that were contained in Mast’s file.

THE COURT: Okay.

MR. FLYNN: And he was -- you know, they have -- they’re, obviously, not complete because they -- placed on a printer, appeared like we used to do in the old days.

MR. TALARICO: Yes. Was the Tilsner case included in -- in the blank Exhibit 12 you sent to U.S. Legal, Barbara Schmidt? And was -- when you discussed with Mr. Flynn the failure of his -- or Mr. Mast’s internet, didn’t he say, I can’t see these, I can only see their first one (indiscernible), which was the Lagano (phonetic) case? And wasn’t there continued discussion by Mr. Flynn that he didn’t -- he didn’t produce all of the

7 Also in Section 2C of [Evidence of Fraud on the Court in 17LA377 During Clinton-Williams Representation](#)

8 Also in Section 2K of [Evidence of Fraud on the Court in 17LA377 During Clinton-Williams Representation](#)

9 Section 2C, paragraph 2C26 of [‘ARDC Complaint Against Edward X. Clinton and Julia C. Williams’](#) describes how Williams inexplicably could not recall anything about Tilschner v Spangler or the contents of ‘Exhibit 12’ weeks after preparing multiple subpoenas on ‘Exhibit 12’ and while appearing in court to address the subpoenas because she claimed the events happened ‘so long ago’.

documents you sent on -- in hardcopy because he wanted to save paper?

MS. WILLIAMS: So that's -- I guess that's a lot of questions. So what --

MR. TALARICO: It is.

MS. WILLIAMS: What -- what -- I cannot recall what cases were included and weren't included at this point. There -- there was an e-mail to Mr. Flynn with the exhibit that is attached that I believe was produced in the subpoena. So whatever that exhibit was is -- is what I would have used. So I know there was, like, a Laravo case or -- I remember the first case was like Laravo or Lavajo, L-A-V-A-J-O, or something like that. But right now, off the top of my head, I don't remember what other cases were included.

MR. TALARICO: I'm talking about -- Judge, if I might, please? Excuse me. I'm sorry, Ms. Williams. There was -- what the reporter had was blank. What Mr. Flynn's client said was, I see the Lagano (phonetic) one. So the Exhibit 12 that was sent, like, a week or two after the deposition had Lagano, Troy, and the same exact Lagano case, and it did not have the Tilsner case involved, and the Tilsner case was very important. So it was an exact duplication of one case and a second case. But this is -- Judge, it's not just the Exhibit 12. The entire deposition --

THE COURT: Well, are you asking a question about Exhibit 12? Because if we're done asking questions, I'm gonna let her go.

MR. TALARICO: Okay. Yep. I'm done."

After we watched our formerly retained attorney in 17LA377 intentionally and methodically lie about suppressing key evidence that they knew about from our first meeting together and were informed of repeatedly, Dulberg raised the issue of Tilschner v Spangler in a court document in November 23, 2022.¹⁰

On November 30, 2022 Flynn filed DEFENDANTS THE LAW OFFICES OF THOMAS J. POPOVICH, P.C. AND HANS MAST'S RESPONSE TO PLAINTIFF'S 2nd AMENDED MOTION TO EXCLUDE THE DEPOSITION OF HANS MAST which contains the following point ¶12:¹¹

"12) Of concern is a statement on page 19 of Dulberg's motion in which he argues that Mast had insisted that the decision in the Tilschner v. Spangler case was the reason Dulberg would not prevail in the underlying case against the McGuire's. The statement is inexplicably made "on information and belief." This is unacceptable. Dulberg has made no such disclosure in fact discovery (now closed) about this very specific discussion between Mast and himself regarding the Tilschner case. If Dulberg believes he has disclosed it, he should be required to identify where in his answers and amended answers to discovery or his deposition he has identified such discussion with this amount of specificity. Defendants submit that no such disclosure exists."

Opposing counsel Flynn and Popovich knew Tilschner v Spangler was never mentioned in the record because they collaborated with Dulberg's legal malpractice attorneys Gooch-Walczyk and Clinton-Williams to successfully '**bury key evidence**' for around 6 years.

It is not credible that Williams made the claim to the court that she cannot recall the contents of "exhibit 12" when she stated, "It was a series of cases. I don't know that -- I just can't recall what all was asked about it, but I know there were -- it was -- it was --" " -- copies of case law." and when asked by Dulberg's current attorney (at the time) she claimed, "What -- what -- I cannot recall what cases were included and weren't included at this point." When Williams states "... at this point" she was implying that her dealings with exhibit 12 were so long ago that "at this point" she can no longer recall what they were. But Williams prepared 4 different responses to a subpoena which centered on exhibit 12 within the previous 3 months and Williams was then appearing in court to address outstanding issues with the subpoena and around exhibit 12, including a motion to compel.

Case 17LA377 was then dismissed on February 1, 2024 on a Motion for Summary Judgment based on the fake

10 [Group Exhibit 41 Appeal Package for 17LA377/CLR Vol 2 of 2 230421 1627 22D90D40.pdf](#) page 1770

11 [Exhibit C21-2022-11-30_Flynn Answer to Motion to Strike Mast Deposition.pdf](#) (¶12 on page 4)

Statute of Limitations argument that Gooch and Clinton and Williams were so instrumental in setting up in the 17LA377 court record (in Dulberg's name).

The fake Statute of Limitations argument set up by Gooch and Clinton and Williams was established as final when Talarico intentionally destroyed the ability to appeal the decision. Talarico intentionally filed a Notice of Appeal to place Dulberg as a Self Representing Litigant without Dulberg's knowledge. Talarico represented himself to Dulberg as if Talarico was Dulberg's acting attorney during the 17LA377 appeal process and continued to charge Dulberg the entire time and act as if Talarico was Dulberg's acting attorney during the 17LA377 appeal process. After Talarico failed to file an appellate court brief the case was dismissed by the appellate court (for failure to file a brief). As we prepared to file a Supreme Court Petition (which was due by January 8, 2024) Talarico sent us an email which informed us to place a "preamble" in the Supreme Court Petition (contrary to Illinois law):^s

Date : 1/6/2024 11:52:32 AM¹²

From : "Alphonse Talarico"

To : "Paul Dulberg" , "Paul Dulberg" , "T Kost"

Subject : Preamble

Gentlemen,

Please use the word "Preamble".

PREAMBLE: Much of the matter that follows can be characterized as fraud by officers of the court. Currently there are nine (9) related ARDC investigations pending (#2023INO2517, #2023INO2518, #2023INO3135, #2023INO3136, #2023INO3894-R, #2023INO, 2023INO3898-R, #2023INO3897-R, 2023INO3895-R, #2023 INO3896-R), two (2) submitted Judicial Inquiry Board "Complaints against a Judge," and one (1) Judiciary Inquiry Board "Complaint against a Judge" that was unable to be processed because the individual named is no longer an active Illinois state court judge.

On January 8, 2024 (the day the Supreme Court Petition was due) Talarico informed us that the Supreme Court clerk told him we can place hyperlinks in the Supreme Court Petition (contrary to Illinois law). Talarico also informed us hours before the Supreme Court Petition was due that Talarico "didn't know how" to write an index for a Supreme Court Petition and we would have to figure that out ourselves. This entire time, Dulberg was listed as a Self Represened Litigant in the 17LA377 appeal without knowing it.

Every one of these acts are examples of Talarico committing willful and wanton prima facie professional misconduct toward his client Dulberg because these are all examples of Dulberg's retained attorney misinforming Dulberg about settled points of law that could be looked up by the means of ordinary research techniques.

On May 29, 2024 Talarico made his very first negative comment about the website www.fraudonthecourt.net in any communications record in his response to the ARDC complaint we filed against him when Talarico wrote:

"Mr. Dulberg has created a web site with his half-brother Thomas Kost to "reveal to the world" all the injuries that the now ten named attorneys and judge and court clerks and certified court reporters have intentionally caused his family and himself." (Talarico's ARDC Response, p3)

- The website www.fraudonthecourt.net was created around October 13, 2023.¹³
- Talarico was given access to the website on October 14, 2023.¹⁴
- Talarico accepted \$10,000 dollars retainer at around September 26, 2023 to pursue "Fraud on the court,

12 [Group Exhibit 50_Dulberg-Talarico communication from October, 2020 onward/2024-01-06_1152-32__Alphonse Talarico__contact@lawofficeofalphonsetalarico.com__Preamble.pdf](#)

13 [Group Exhibit 50_Dulberg-Talarico communication from October, 2020 onward/2023-10-13_Gmail - T Kost, thank you for your order..pdf](#)

14 [Group Exhibit 50_Dulberg-Talarico communication from October, 2020 onward/2023-10-13_Gmail - Online file access.pdf](#)

Civil rights violations, Reopening the bankruptcy, ect”¹⁵

- Talarico told Dulberg to place a “preamble” in the 17LA377 Supreme Court Petition which informs the Illinois Supreme Court of the claims against Popovich, Mast, Balke, the Baudins, Gooch and Clinton and Williams made in our ARDC Complaints against them on January 6, 2024.
- In the attorney-client email communication Talarico never referred to the website in a negative way.¹⁶
- For the first time, on May 29, 2024 in Talarico’s Response to the ARDC complaint, Talarico makes the first statement in any record which refers to the website contents negatively as a “conspiracy theory”.

In addition, Talarico was provided with evidence of a sophisticated system of document and information suppression as early as November 11, 2022¹⁷ which Clinton and Williams used against Dulberg while they collaborated with opposing counsel Flynn. Dulberg and Kost wrote and filed a 143 page [ARDC Complaint against Clinton and Williams](#) with all claims supported with over [34 gigabytes of evidence](#) on a thumbdrive given to the ARDC and also available online on July 28, 2023. We wanted to file it directly with the ARDC but Talarico asked us to file with the ARDC through him, so we did. The same information appeared on the public website www.fraudonthecourt.net as of October 13, 2023 and Talarico accepted \$10,000 retainer on September 26, 2023 to pursue the same issues.

In the attorney-client email communication Talarico never referred to the information he was provided on November 11, 2022 or the 143 page ARDC Complaint written entirely by Kost and Dulberg and filed by Talarico with the ARDC on July 28, 2023 in a negative way (Group Exhibit 50)¹⁸. For the very first time in any communications record, on May 29, 2024, in Talarico’s Response to the ARDC complaint Talarico makes the first statement in any record which refers to the many claims we made about Clinton and Williams (which are documented in the 143 page ARDC complaint against them) negatively as a “conspiracy theory”.

- This is more than 17 months after Talarico was first provided with the evidence.
- This is about 10 months after Talarico filed a 143 page complaint with the ARDC that Kost and Dulberg wrote describing the claims in detail.
- This is more than 8 months after Talarico accepted a \$10,000 retainer to pursue the same claims against Clinton and Williams, among other claims.
- This is more than 4 months after Talarico told Dulberg to inform the Illinois Supreme Court of the same claims against Clinton and Williams in a “preamble” to our 17LA377 Supreme Court Petition and abruptly resigned as counsel 8 days later (6 days after the Supreme Court Petition was rejected by the clerk).

WE WELCOME FURTHER INVESTIGATION OF THE ACTIONS OF GOOCH BY THE ARDC BUT WE HAVE GOOD REASON TO REMAIN SKEPTICAL BECAUSE CLINTON AND WILLIAMS AND TALARICO WERE NOT HELD TO ACCOUNT FOR THEIR ACTIONS

No fact-based investigation and review of Gooch’s actions in 17LA377 can be realized when the 2 law firms that perpetrated that same fraudulent acts *after Gooch was fired* were already found by the ARDC to not be liable for any of their fraudulent actions.

Clinton and Williams and also Talarico were already found by the ARDC to have done nothing wrong in

15 [Group Exhibit 50_Dulberg-Talarico communication from October, 2020 onward/2023-09-26_0808-21__Paul Dulberg__Paul_Dulberg@comcast.net__Retainer - Multiple cases.pdf](#)

16 [Group Exhibit 50](#) All attorney-client email communication between Dulberg and Talarico and Kost and Talarico (about 2600 email files) are available online at this link:

https://www.fraudonthecourt.net/exhibits/Group Exhibit 50_Dulberg-Talarico communication from October, 2020 onward/

17 [Group Exhibit 50_Dulberg-Talarico communication from October, 2020 onward/2022-11-10_1256-36__Alphonse Talarico__contact@lawofficeofalphonsetalarico.com__Re_ Document suppression smoking gun.pdf](#)

18 [Group Exhibit 50](#) All attorney-client email communication between Dulberg and Talarico and Kost and Talarico (about 2600 email files) are available online at this link:

https://www.fraudonthecourt.net/exhibits/Group Exhibit 50_Dulberg-Talarico communication from October, 2020 onward/

17LA377 and Talarico was already found by the ARDC to have done nothing wrong in 22L010905 despite all the evidence and explanations we provided (and continue to provide) to the ARDC. This means the ARDC has already laid the groundwork for Gooch to make the following claim:

“Dulberg had separate legal counsel who represented him after we withdrew.”

“If there had been legal malpractice, then Dulberg had counsel who could have advised him of his rights, with the applicable statute of limitations.”

Gooch can then use the statements underlined in **purple** in “Trial Handbook for Illinois Lawyers” Chapter 22 Section 29 (on pages 4, 5 and 6) and related case laws in his defense since the ARDC already dismissed claims against all subsequent retained attorneys Clinton and Williams and Talarico concerning case 17LA377. There is nothing to stop Gooch from using this defense successfully.

Then, after Gooch is found by the ARDC to have done nothing wrong based on this defense, if Gooch is ever sued for his actions in 17LA377 in the future, Gooch can use the case law Metzger v Brotman and Skolnick and the letter of the final decision by the ARDC which clears him of all wrongdoing to claim the ARDC has already adjudicated this issue in Gooch’s favor and Gooch therefore cannot be held liable in any Illinois court for his actions in 17LA377.

This is foreseeable, because this is exactly what Talarico is now claiming in active case 22L010905. Talarico is currently claiming his actions during 22L010905 (described in detail in 22L010905 court records linked earlier and in multiple video series provided to the ARDC and made available to the general public) were already adjudicated in a [2 page final decision by the ARDC](#) and our claims were found to have no merit. But the [2 page letter final decision by the ARDC](#) concerning Talarico’s actions never addressed any of Talarico’s actions in either 22L010905 and 17LA377. The subjects were just walked around and ignored.

This is also foreseeable concerning Clinton and Williams. They, too, can simply claim that our claims were already adjudicated by the ARDC and were found to have no merit. Clinton and Williams can also use the [final decision by the ARDC concerning them](#) and the case law Metzger v Brotman and Skolnick to claim the ARDC has already adjudicated this issue in their favor and they therefore cannot be held liable in any Illinois court for their actions in 17LA377.

This places the ARDC in the central role of determining whether Gooch and Clinton and Williams and Talarico are allowed to get away with committing systematic willful and wanton prima facie professional misconduct against Dulberg.

The key to understanding what actually happened in case 17LA377 is in seeing the pattern in the Table “LOCKED-IN HIDDEN STRATEGY IN 17LA377” on page 8. The patterns reveal that these 3 law firms worked according to a coordinated, methodical strategy which is visible by watching what happened with items 1 to 10 listed in the table as a newly retained law firm replaces the previous law firm. Law firms change but hidden strategies do not.

The statements underlined in **red** and **blue** on pages 4, 5 and 6 unmistakably reveal acts of systematic and coordinated willful and wanton prima facie professional misconduct by both Gooch and Clinton and Williams.

[Table 4A and 4B](#) contains all statements by both Gooch and Clinton and Williams in the Complaint, First Amended Complaint and Second Amended Complaint on how Gooch, Clinton and Williams determined the calculation of Statute of Limitations in 17LA377. All statements are unmistakably at variance with the explanation of how to calculate the Statute of Limitations for legal malpractice in Illinois given in “Trial Handbook for Illinois Lawyers” in the statements underlined in **blue** on pages 4, 5 and 6.

[Table 7](#) contains all statements by the presiding Judge Thomas Meyer (who presided over both 17LA377 and underlying case 12LA178), Judge Joel Berg (who presided in case 17LA377 for only 1 day to issue the final order granting the Summary Judgment and dismissing the case) and opposing counsel Flynn on how to calculate

the Statute of Limitations in case 17LA377. All statement are unmistakably at variance with the explanation of how to calculate the Statute of Limitations for legal malpractice in Illinois given in “Trial Handbook for Illinois Lawyers” Chapter 29, Section 22 in the statements underlined in blue (on pages 4, 5 and 6).

[Table 10](#) and the court statements by Williams about the contents of Mast deposition exhibit 12 and any memory she may have of Tilschner v Spangler unmistakably demonstrate she intentionally lied to knowingly conceal her active participation in the supression of key evidence in 17LA377.

[Table 3](#) contains statements by Gooch and Clinton and Williams (on Dulberg’s behalf) which are deliberately placed in the 17LA377 common law record to be contrary to fact. Gooch and Clinton and Williams must have known that the \$300, 000 “upper cap” was placed on Dulberg’s claim against Gagnon from June 13, 2016 to August 11, 2016 by Allstate and the Baudins in front of Judge Meyer in 12LA178 because the placement is clearly described in 12LA178 court transcripts and because Dulberg informed Gooch and Clinton and Williams repeatedly that Dulberg never signed the binding mediation agreement and refused to ever agree to participate in any binding mediation process.

Talarico intentionally destroyed the 17LA377 appeal process and Talarico intentionally acted to create a Supreme Court petition of the wrong format, and then to blame Dulberg and Kost for the wrong format.

Since the ARDC has already dismissed all the actions by both Clinton and Williams and Talarico documented in court cases and on our website and in around 100 videos available to the public, we do not understand how the same institution that had found Clinton and Williams and Talarico to have done nothing wrong in case 17LA377 can ever find that Gooch did something wrong in 17LA377.

Under these conditions we do not find the ARDC dismissal of Talarico for doing anything wrong in both 17LA377 and 22L010905 as credible. The final decision is less than 2 pages long and completely walks around and ignores the claims we actually made concerning Talarico’s conduct.

Under these conditions we do not find the ARDC dismissal of Clinton and Williams for doing anything wrong in 17LA377 as credible. The final decision completely walks around and ignores the claims we actually made concerning the actions of Clinton and Williams.

In the interest of the safety of the public it would be better to reopen the ARDC Complaints against Clinton and Williams and Talarico in light of what is currently on the record concerning cases 17LA3777 and 22L010905.

No fact based investigation and review of Gooch’s actions in 17LA377 can be realized without also investigating and reviewing how Clinton and Williams, and then Talarico carried on the actions that Gooch established and actively covered for and destroyed any appeal of the fake Statute of Limitations argument first placed in the record by Gooch. It was this that led to a Summary Judgment of case 17LA377 based on the same fake Statute of Limitations arguments that both Gooch and Clinton worked to establish. Then it is Talarico that locked in the fake argument as final and binding by intentionally destroying the appeal process of 17L010905.

It is simply impossible to competently review Gooch’s actions without taking into account the monumental role that Clinton and Williams and later Talarico played in the final destruction of Dulberg’s 17LA377 and 22L010905 claims.

/s/Paul Dulberg
Paul Dulberg
(847) 497-4250
Paul_Dulberg@comcast.net
4606 Hayden Ct. McHenry, IL 60051

/s/Thomas Kost
Thomas Kost
(847) 553-4404
tkost999@gmail.com
423 Dempster St. Mt. Prospect, IL 60056

From: Alphonse Talarico contact@lawofficeofalphonsetalarico.com 
Subject: Notice of Motion to Unseal Documents in Dulberg v. ADR et al, 2022L010905, Cook County, Illinois, County Department, Law Division
Date: July 23, 2025 at 1:05 PM
To: ARDCClerksDepartment@iadc.Org, LAW CALucc law.calucc@cookcountyil.gov, Jochum, Jason jason.jochum@lewisbrisbois.com, Robert Chapman rchapman@chapmanspingola.com, Suhani Mehrotra smehrotra@chapmanspingola.com, Anto, Christine canto@amundsendavislaw.com, Manos, George george.manos@lewisbrisbois.com, McGourty, Zachary zachary.mcgourty@lewisbrisbois.com, Paul Dulberg paul_dulberg@comcast.net, Tom Kost tkost999@gmail.com, Tinajero, Michelle mtinajero@amundsendavislaw.com, Schuth, Jennifer jschuth@amundsendavislaw.com, Resis, Michael mresis@amundsendavislaw.com



Dear Administrator Gutierrez,

This email serves as notice, pursuant to ARDC and Illinois Supreme Court Rules, of the filing of a motion to unseal certain documents in the trial court case of Dulberg v. ADR et al, 2022L010905, Cook County, Illinois, County Department, Law Division , currently pending in Calendar U Law Division, Circuit Court of Cook County.

The motion was filed on June 24, 2025, in the above said Circuit Court of Cook County, Illinois and seeks to unseal the entire file No. 2024IN00264.

The basis for the motion to unseal is that Dulberg and Kost in their post-trial motion to reconsider, and in their response to the above reference motion to unseal (BEFORE IT HAS BEEN PRESENTED) and in other public forums make the same allegations they presented before the ARDC in the above reference closed ARDC investigation and additionally accuse attorney Alphonse A. Talarico of lying to the ARDC.

Please note that this is an amendment to the attached previously filed notice of filing, and the ARDC will be provided with any court orders or decisions related to the motion to unseal as they become available.

Please see the attached Notice of Motion and Motion to Unseal.

Sincerely,

AAT

Alphonse A. Talarico/Law Office of Alphonse A. Talarico

707 Skokie Blvd., Suite 600

Northbrook, Illinois 60062

ARDC #6184530

(312) 808-1410

(312) 608-1410



Filed and set Motion to Unseal for
July 29 2025 06242025 MOT (1...
2.2 MB



Notice of Motion July 29 2025
Motion to Unseal ARDC...
2.1 MB

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

FILED
6/24/2025 8:21 PM
Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
2022L010905
Calendar, U
33290700

PAUL R. DULBERG, INDIVIDUALLY AND)
THE PAUL R. DULBERG REVOCABLE)
TRUST)

Plaintiffs,)

Vs.)

KELLY N. BAUDIN A/K/A BAUDIN &)
BAUDIN, BAUDIN & BAUDIN AN)
ASSOCIATION OF ATTORNEYS, LAW)
OFFICES OF BAUDIN & BAUDIN,)
BAUDIN & BAUDIN LAW OFFICES,)
WILLIAM RANDAL BAUDIN II A/K/A)
BAUDIN & BAUDIN, BAUDIN & BAUDIN)
AN ASSOCIATION OF ATTORNEYS, LAW)
OFFICES OF BAUDIN & BAUDIN,)
BAUDIN & BAUDIN LAW OFFICES,)
KELRAN, INC A/K/A THE BAUDIN LAW)
GROUP, Ltd., JOSEPH DAVID OLSEN,)
A/K/A YALDEN, OLSEN & WILLETTE)
LAW OFFICES, CRAIG A WILLETTE,)
A/KIA YALDEN, OLSEN & WILLETTE)
LAW OFFI ALPHONSE A. TALARICO IN)
RELATION TO THOMAS KOST No.)
2024IN00264CES, RAPHAEL E YALDEN)
II, A/KIA YALDEN, OLSEN & WILLETTE)
LAW OFFICES, ADR SYSTEMS OF)
AMERICA, LLC., ASSUMED NAME ADR)
COMMERCIAL SERVICES, ALLSTATE)
PROPERTY AND CASULTY INSURANCE)
COMPANY)

Defendants.

2022L010905
CASE NO. _____

**MOTION TO UNSEAL ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION
DOCUMENTS AND FINDINGS IN Re: ALPHONSE A. TALARICO IN RELATION TO THOMAS
KOST No. 2024IN00264 AND TO ALLOW THE FILING OF ALPHONSE A. TALARICO'S RESPONSE
TO DULBER and KOST'S POST-JUDGEMENT MOTION TO RECONSIDER WITHIN 14 DAYS
AFTER A RULING ON THE MOTION TO UNSEAL IS MADE**

NOW COMES, Alphonse A. Talarico, an attorney licensed to appear before this Honorable Court
and an interested person, pursuant to Illinois Supreme Court Rule 766, and hereby respectfully moves

this Court to unseal and make public certain Attorney Registration and Disciplinary Commission (ARDC) documents and findings related to the investigation of Alphonse A. Talarico's actions and non-actions and secret conspiracies with other attorneys alleged to hinder and damage and continuing to hinder and damage the Plaintiffs herein. In support of this Motion, the moving Attorney Alphonse A. Talarico states as follows:

1. The ARDC has conducted an investigation concerning ALPHONSE A. TALARICO IN RELATION TO THOMAS KOST No. 2024IN00264 which was concluded on January 14, 2025.
2. The Complainant in the ARDC matter is now making the same allegations against ALPHONSE A. TALARICO in a pending matter before this Court, case number 2022 L 010905.
3. The ARDC documents and findings contain information directly relevant to the allegations currently being litigated in this Court.
4. Illinois Supreme Court Rule 766(a) designates certain ARDC proceedings as "private and confidential," including investigations conducted by the Administrator and proceedings before the Inquiry Board. Ill. Sup. Ct., R 766.
5. However, Rule 766(a) also establishes that proceedings under Rules 751 through 780 "shall be public" with specific enumerated exceptions. Ill. Sup. Ct., R 766.
6. The Illinois Supreme Court has administrative supervision over all attorney disciplinary proceedings through the ARDC pursuant to Rule 751. Ill. Sup. Ct., R 751.
7. The ARDC proceedings regarding ALPHONSE A. TALARICO IN RELATION TO THOMAS KOST No. 2024IN00264 have concluded, and the information contained therein is directly relevant to the pending litigation in this Court.
8. Illinois law recognizes that court records are generally public records, and "all persons shall have free access

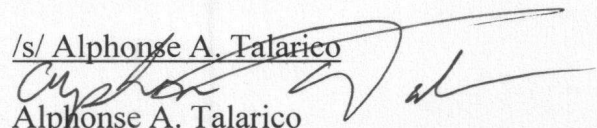
9. The interests of justice and judicial economy would be served by unsealing the ARDC documents and findings, as they contain information directly relevant to the claims currently being litigated before this Court.
10. Unsealing these documents would prevent duplicative proceedings and ensure that this Court has access to all relevant information necessary to make a fully informed decision in case number 2022 L 010905.
11. The confidentiality provisions of Rule 766 should not be used to shield relevant information from this Court when the same allegations that were investigated by the ARDC are now being litigated in this Court.
- Skolnick V. Alzheimer & Gray, 191 Ill. 2d 214 (P15 L24-P21L5)*

WHEREFORE, Alphonse A. Talarico respectfully requests that this Honorable Court enter an Order:

1. Unsealing the ARDC documents and findings related to the investigation of ALPHONSE A. TALARICO IN RELATION TO THOMAS KOST No. 2024IN00264;
2. Making such documents and findings available for use in case number 2022 L 010905;
3. Extending the time for Alphonse A. Talarico to file and serve his Response to Dulberg's Post-Judgment Motion to Reconsider to 14 days after a ruling on this Motion to Unseal;
4. Granting such other and further relief as this Court deems just and proper.

Respectfully submitted,

/s/ Alphonse A. Talarico


Alphonse A. Talarico

6184530 & CC53293

707 Skokie Boulevard Suite #600

(312) 808-1410

contact@lawofficeofalphonsetalarico.com

2022 L 010905

Case Number



IN THE STATE OF ILLINOIS, CIRCUIT COURT

Enter the case information as it appears on your other court documents.

DEFENDANTS/RESPONDENTS: Alternative Dispute Resolution
Who the case was filed against.

First, Middle, and Last Name, or Business Name



*Explain in a few words what you are asking the judge to do. This should match the title you write in **1** on the Motion.*

Motion to: to unseal ARDC documents and conclusions

Information about getting a court date and how to attend is available from the Circuit Clerk. You can find their contact information at ilcourts.info/CircuitClerks. If you are e-filing in Cook County, you may get the court date when you e-file.

a. The court date for the *Motion* I filed is scheduled on:

_____ at _____ ☐ a.m. ☐ p.m. in 1907
Month, Day, Year *Time* *Courtroom Number*

Court dates may be scheduled in-person, remotely or a combination of in-person and remotely. Find out how your court date will be scheduled and provide that information here. Add the Clerk's phone number and website.

b. Attend court in any of the ways checked:

☒ **In person at:** Richard J Daley Center, 50 W. Washington St., Chicago, Courtroom 1907

<i>Courtroom Address</i>	<i>Courtroom Number</i>
--------------------------	-------------------------

☒ **Remotely** (video or telephone option)

By video conference at: www.zoom.com
Video Conference Website

Log-in information: Zoom Meeting ID: 768 225 2047, Zoom Passcode: 902018
Video Conference Log-in Information, Meeting ID, Password, etc.

By telephone at: (312) 626-6799
Call-in Number for Telephone Remote Appearance

Exhibit 263

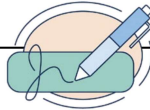
To find out more about remote court options:

Phone: (312) 603-5030

Circuit Clerk's Phone Number

or Website: cookcountyclerkofcourt.org

Website URL

**SIGN**Under [Illinois Supreme Court Rule 137](#), your signature means that you:

1) read the document, 2) believe it is true and correct, and 3) are not filing it to cause delay or for another bad reason.

If you are filling out this form online, sign your name by typing it. If you are filling out this form by hand, sign and print your name.

Your Signature /s/ Alphonse A. Talarico Print Your Name _____Your Address 707 Skokie Boulevard
Street, Apt. # City State Zip CodeYour Phone Number (312) 808-1410 Attorney Number (if any) 6184530Your Email (if you have one) contact@lawofficeof alphonsetalarico.comBe sure to **check your email every day** so you do not miss important information, court dates, or documents from other parties.**3. PROOF OF DELIVERY**Fill out the information below to show how you are sending this document to the other people in the case. If a person in the case has a lawyer, **you must send this document to their lawyer.****a. I am sending this document to:**Name: See Service List Attached
First Middle Last NameAddress: _____
Street, Apt. # City State Zip Code

Email Address: _____

By: ☒ Electronically to the email address in **3a**:☐ By email (not through an EFSP).☒ Using an approved electronic filing service provider (EFSP).☐ I or the person I am sending the document to do not have an email address. I am sending the document by:☐ Mail or third-party carrier to the address in **3a**, with postage or delivery charge prepaid.Location of mailbox or third-party carrier: _____
City State☐ Personal hand delivery at this address:

NOTE: You can only deliver to the party, party's family member over 13 at party's residence, party's lawyer, or party's lawyer's office

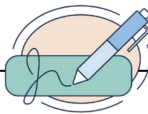
Address _____
Street, Apt. #, City, State, and Zip Code☐ Mail to the address in **3a**, from a prison or jail: _____
Name of Prison or JailThis document will be sent on: Date: 06/24/2025 Time: 9:30pm
Month, Day, Year Include AM or PM**Exhibit 263**

b. ☐ I am not sending these documents to additional people.**- OR -**☐ I am sending these documents to an additional person not listed in **3a**:Name: _____
*First Middle Last Name*Address: _____
Street, Apt. # City State Zip Code

Email Address: _____

By: ☐ Electronically to the email address in **3b**:☐ By email (*not through an EFSP*).☐ Using an approved electronic filing service provider (EFSP).☐ I or the person I am sending the document to do not have an email address. I am sending the document by:☐ Mail or third-party carrier to the address in **3b**, with postage or delivery charge prepaid.Location of mailbox or third-party carrier: _____
City State☐ Personal hand delivery at this address:

NOTE: You can only deliver to the party, party's family member over 13 at party's residence, party's lawyer, or party's lawyer's office

Address _____
Street, Apt. #, City, State, and Zip Code☐ Mail to the address in **3b**, from a prison or jail: _____
*Name of Prison or Jail*This document will be sent on: Date: _____ Time: _____
Month, Day, Year Include AM or PM☐ I am sending the document to more than 2 people and have completed an *Additional Proof of Delivery* form.**SIGN**Under [735 ILCS 5/1-109](#), your signature means that you:

1) certify that everything in this document is true and correct, and 2) understand that making a false statement on this form is perjury and has penalties provided by law.

If you are filling out this form online, sign your name by typing it. If you are filling out this form by hand, sign and print your name.

Your Signature /s/ _____ Print Your Name _____Your Address _____
Street, Apt. # City State Zip Code

Your Phone Number _____ Attorney Number (if any) _____

Your Email (if you have one) _____

Be sure to **check your email every day** so you do not miss important information, court dates, or documents from other parties.



WHAT'S NEXT

NEXT STEP FOR PERSON FILLING OUT THIS FORM:

After you fill out your *Motion* and *Notice of Court Date for Motion*, file them with the Circuit Clerk's office in the county where your case is taking place. Then, send your forms to the other people in the case. Find your Circuit Clerk here: ilcourts.info/CircuitClerks.



Learn more about each step in the process and how to file in our Instructions:

ilcourts.info/motion-instructions.

NEXT STEP FOR PERSON RECEIVING THIS DOCUMENT:

For more information about responding to a case and going to court, call or text **Illinois Court Help** at 833-411-1121 or go to ilcourthelp.gov.

If there are any words or terms used in these instructions that you do not understand, please **visit Illinois Legal Aid Online** at ilao.info/glossary. You may also find more information, resources, and the location of your local legal self-help center at: ilao.info/lshc-directory.

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From: Paul Dulberg Paul_Dulberg@comcast.net
Subject: Re: Notice of Motion to Unseal Documents in Dulberg v. ADR et al, 2022L010905, Cook County, Illinois, County Department, Law Division
Date: July 26, 2025 at 5:01 PM
To: ARDCClerksDepartment@iardc.Org
Cc: Alphonse Talarico contact@lawofficeofalphonsetalarico.com, LAW CALucc law.calucc@cookcountyil.gov, Jochum, Jason jason.jochum@lewisbrisbois.com, Robert Chapman rchapman@chapmanspingola.com, Suhani Mehrotra smehrotra@chapmanspingola.com, Anto, Christine canto@amundsendavislaw.com, Manos, George george.manos@lewisbrisbois.com, McGourty, Zachary zachary.mcgourty@lewisbrisbois.com, Tom Kost tkost999@gmail.com, Tinajero, Michelle mtinajero@amundsendavislaw.com, Schuth, Jennifer jschuth@amundsendavislaw.com, Resis, Michael mresis@amundsendavislaw.com

PD

Dear Administrator Gutierrez,

Mr Talarico wrote, "The basis for the motion to unseal is that Dulberg and Kost in their post-trial motion to reconsider, and in their response to the above reference motion to unseal (BEFORE IT HAS BEEN PRESENTED) and in other public forums make the same allegations they presented before the ARDC in the above reference closed ARDC investigation and additionally accuse attorney Alphonse A. Talarico of lying to the ARDC."

Concerning any allegations mentioned by Mr Talarico, we provided a detailed explanation to the ARDC (supported by evidence) of how Mr Talarico intentionally lied systematically throughout his Response to the ARDC complaint against him in these videos (which are on a public website):

[Illinois response to being informed of attorney network 14- Overview of Talarico response.mp4](https://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2014-%20Overview%20of%20Talarico%20response.mp4)

<https://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2014-%20Overview%20of%20Talarico%20response.mp4>

[Illinois response to being informed of attorney network 15- The 2 theories and writing your own passport.mp4](https://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2015-%20The%202%20theories%20and%20writing%20your%20own%20passport.mp4)

<https://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2015-%20The%202%20theories%20and%20writing%20your%20own%20passport.mp4>

[Illinois response to being informed of attorney network 16- Using timelines and communications records to spot logical poverty.mp4](https://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2016-%20Using%20timelines%20and%20communications%20records%20to%20spot%20logical%20poverty.mp4)

<https://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2016-%20Using%20timelines%20and%20communications%20records%20to%20spot%20logical%20poverty.mp4>

[Illinois response to being informed of attorney network 17- Theory 2 word replacement and passports and a new emerging reality consensus.mp4](https://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2017-%20Theory%202%20word%20replacement%20and%20passports%20and%20a%20new%20emerging%20reality%20consensus.mp4)

<https://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2017-%20Theory%202%20word%20replacement%20and%20passports%20and%20a%20new%20emerging%20reality%20consensus.mp4>

[Illinois response to being informed of attorney network 18- Using timelines and communications records to spot more logical poverty and the sadness of the system.mp4](https://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2018-%20Using%20timelines%20and%20communications%20records%20to%20spot%20more%20logical%20poverty%20and%20the%20sadness%20of%20the%20system.mp4)

<https://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2018-%20Using%20timelines%20and%20communications%20records%20to%20spot%20more%20logical%20poverty%20and%20the%20sadness%20of%20the%20system.mp4>

[Illinois response to being informed of attorney network 19- Using timelines and communications records to spot more logical poverty.mp4](https://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2019-%20Using%20timelines%20and%20communications%20records%20to%20spot%20more%20logical%20poverty.mp4)

<https://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2019-%20Using%20timelines%20and%20communications%20records%20to%20spot%20more%20logical%20poverty.mp4>

[Illinois response to being informed of attorney network 20- Its all in Dulbergs mind.mp4](https://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2020-%20Its%20all%20in%20Dulbergs%20mind.mp4)

<https://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2020-%20Its%20all%20in%20Dulbergs%20mind.mp4>

[Illinois response to being informed of attorney network 21- Fact-find then flip into opposite then run.mp4](https://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2021-%20Fact-find%20then%20flip%20into%20opposite%20then%20run.mp4)

<https://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2021-%20Fact-find%20then%20flip%20into%20opposite%20then%20run.mp4>

[Illinois response to being informed of attorney network 22- Talarico fees compared to Talarico work product.mp4](https://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2022-%20Talarico%20fees%20compared%20to%20Talarico%20work%20product.mp4)

<https://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2022-%20Talarico%20fees%20compared%20to%20Talarico%20work%20product.mp4>

We also provided a detailed explanation to the ARDC (supported by evidence) of how Mr Talarico sabotaged (intentionally destroyed) the claims of his own clients in case 22L010905 in the following video series (which are on a public website):

[The revenge of the network 1- Simplest frivolous lawsuit template.mp4](https://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%201-%20Simplest%20frivolous%20lawsuit%20template.mp4)

<https://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%201-%20Simplest%20frivolous%20lawsuit%20template.mp4>

[The revenge of the network 2- Setting the target up for sanctions and loss of home using frivolous lawsuit templates.mp4](https://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%202-%20Setting%20the%20target%20up%20for%20sanctions%20and%20loss%20of%20home%20using%20frivolous%20lawsuit%20templates.mp4)

<https://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%202-%20Setting%20the%20target%20up%20for%20sanctions%20and%20loss%20of%20home%20using%20frivolous%20lawsuit%20templates.mp4>

[The revenge of the network 3- Trapping target in single issue frivolous lawsuit dead end pathways as they desperately struggle to escape.mp4](https://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%203-%20Trapping%20target%20in%20single%20issue%20frivolous%20lawsuit%20dead%20end%20pathways%20as%20they%20desperately%20struggle%20to%20escape.mp4)

<https://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%203-%20Trapping%20target%20in%20single%20issue%20frivolous%20lawsuit%20dead%20end%20pathways%20as%20they%20desperately%20struggle%20to%20escape.mp4>

The revenge of the network 4- Stripping claims against Bordin and Olsen using Mr Best Mr Future and Burial of troubles

Exhibit 263

[https://www.fraudonthecourt.net/exhibits/Exhibit 263_Email Communications with ARDC Administrator Gutierrez.pdf](https://www.fraudonthecourt.net/exhibits/Exhibit%263_Email%20Communications%20with%20ARDC%20Administrator%20Gutierrez.pdf)

Note: Due to the removal of all Active Hyperlinks (Underlined Text in Blue) when filed with the Circuit Court, the only way to view this exhibit as it was originally provided to the ARDC is to copy and paste the link at the bottom of this page in a web browser.

[The revenge of the network 4- Stripping claims against Baudins and Olsen using No Past No Future and Burial of troublesome issues.mp4](https://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%204-%20Stripping%20claims%20against%20Baudins%20and%20Olsen%20using%20No%20Past%20No%20Future%20and%20Burial%20of%20troublesome%20issues.mp4)
<https://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%204-%20Stripping%20claims%20against%20Baudins%20and%20Olsen%20using%20No%20Past%20No%20Future%20and%20Burial%20of%20troublesome%20issues.mp4>

[The revenge of the network 5- Why reverse engineering to pathway point of origin is essential.mp4](https://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%205-%20Why%20reverse%20engineering%20to%20pathway%20point%20of%20origin%20is%20essential.mp4)
<https://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%205-%20Why%20reverse%20engineering%20to%20pathway%20point%20of%20origin%20is%20essential.mp4>

[The revenge of the network 6- Talaricos Grand finale of sabotages.mp4](https://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%206-%20Talaricos%20Grand%20finale%20of%20sabotages.mp4)
<https://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%206-%20Talaricos%20Grand%20finale%20of%20sabotages.mp4>

[The revenge of the network 7- Discovery of forgeries and Judge-defendant friendship.mp4](https://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%207-%20Discovery%20of%20forgeries%20and%20Judge-defendant%20friendship.mp4)
<https://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%207-%20Discovery%20of%20forgeries%20and%20Judge-defendant%20friendship.mp4>

[The revenge of the network 8- Upstream, downstream and parallel sabotages.mp4](https://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%208-%20Upstream,%20downstream%20and%20parallel%20sabotages.mp4)
<https://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%208-%20Upstream,%20downstream%20and%20parallel%20sabotages.mp4>

[The revenge of the network 9- Downstream ambush and sabotage on ADR Systems pathway.mp4](https://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%209-%20Downstream%20ambush%20and%20sabotage%20on%20ADR%20Systems%20pathway.mp4)
<https://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%209-%20Downstream%20ambush%20and%20sabotage%20on%20ADR%20Systems%20pathway.mp4>

[The revenge of the network 10- The many ways we tried to raise issues of forgery and fraud on all pathways.mp4](https://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%2010-%20The%20many%20ways%20we%20tried%20to%20raise%20issues%20of%20forgery%20and%20fraud%20on%20all%20pathways.mp4)
<https://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%2010-%20The%20many%20ways%20we%20tried%20to%20raise%20issues%20of%20forgery%20and%20fraud%20on%20all%20pathways.mp4>

[The revenge of the network 11- Multi-sabotage of all appeal pathways.mp4](https://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%2011-%20Multi-sabotage%20of%20all%20appeal%20pathways.mp4)
<https://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%2011-%20Multi-sabotage%20of%20all%20appeal%20pathways.mp4>

We describe the same activities of Mr Talarico in the following court documents filed in case 22L010905:

[2025-02-24_2022L010905_Dulberg Response to ADR Petition for fees with Exhibits-File Stamped.pdf](https://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2056_Complete%20legal%20argument%20between%20Talarico%20and%20ADR%20Systems/2025-02-24_2022L010905_Dulberg%20Response%20to%20ADR%20Petition%20for%20fees%20with%20Exhibits-File%20Stamped.pdf)
https://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2056_Complete%20legal%20argument%20between%20Talarico%20and%20ADR%20Systems/2025-02-24_2022L010905_Dulberg%20Response%20to%20ADR%20Petition%20for%20fees%20with%20Exhibits-File%20Stamped.pdf

[2025-03-14 COURT APPROVED SUPPLEMENT TO DULBERG&€™S RESPONSE TO ADR&€™S PETITION FOR AN AWARD OF ATTORNEYS FEES AND COSTS with Exhibits.pdf](https://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2056_Complete%20legal%20argument%20between%20Talarico%20and%20ADR%20Systems/2025-03-17_COURT%20APPROVED%20SUPPLEMENT%20TO%20DULBERGS%20RESPONSE%20TO%20ADRS%20PETITION%20FOR%20AN%20AWARD%20OF%20ATTORNEYS%20FEES%20AND%20COSTS%20with%20Exhibits_File%20Stamped.pdf)
https://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2056_Complete%20legal%20argument%20between%20Talarico%20and%20ADR%20Systems/2025-03-17_COURT%20APPROVED%20SUPPLEMENT%20TO%20DULBERGS%20RESPONSE%20TO%20ADRS%20PETITION%20FOR%20AN%20AWARD%20OF%20ATTORNEYS%20FEES%20AND%20COSTS%20with%20Exhibits_File%20Stamped.pdf

[2025-05-20 MOTION TO RECONSIDER APRIL 22 2025 FINAL ORDER BASED ON MISTAKES IN LAW Exhibits-FileStamped.pdf](https://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2056_Complete%20legal%20argument%20between%20Talarico%20and%20ADR%20Systems/2025-05-20_MOTION%20TO%20RECONSIDER%20APRIL%2022%202025%20FINAL%20ORDER%20BASED%20ON%20MISTAKES%20IN%20LAW_Exhibits-FileStamped.pdf)
https://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2056_Complete%20legal%20argument%20between%20Talarico%20and%20ADR%20Systems/2025-05-20_MOTION%20TO%20RECONSIDER%20APRIL%2022%202025%20FINAL%20ORDER%20BASED%20ON%20MISTAKES%20IN%20LAW_Exhibits-FileStamped.pdf

[2025-07-11 DULBERGS RESPONSE TO TALARICOS MOTION TO UNSEAL with exhibits-FS 2025-07-14.pdf](https://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2056_Complete%20legal%20argument%20between%20Talarico%20and%20ADR%20Systems/2025-07-11_DULBERGS%20RESPONSE%20TO%20TALARICOS%20MOTION%20TO%20UNSEAL%20with%20exhibits-FS%202025-07-14.pdf)
https://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2056_Complete%20legal%20argument%20between%20Talarico%20and%20ADR%20Systems/2025-07-11_DULBERGS%20RESPONSE%20TO%20TALARICOS%20MOTION%20TO%20UNSEAL%20with%20exhibits-FS%202025-07-14.pdf

In addition, we also provided a detailed explanation to the ARDC (supported by evidence) of how Mr Talarico intentionally destroyed the claims of his own clients in case 17LA377 in the following video series (which are on a public website):

[Being targeted by an attorney network 1- Targeted by ones own retained attorneys.mp4](https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%201-%20Targeted%20by%20ones%20own%20retained%20attorneys.mp4)
<https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%201-%20Targeted%20by%20ones%20own%20retained%20attorneys.mp4>

[Being targeted by an attorney network 2- The network and the system.mp4](https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%202-%20The%20network%20and%20the%20system.mp4)
<https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%202-%20The%20network%20and%20the%20system.mp4>

[Being targeted by an attorney network 3- Legal malpractice system of protection.mp4](https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%203-%20Legal%20malpractice%20system%20of%20protection.mp4)
<https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%203-%20Legal%20malpractice%20system%20of%20protection.mp4>

[Being targeted by an attorney network 4- Simplest way to sabotage targets legal malpractice complaints.mp4](https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%204-%20Simplest%20way%20to%20sabotage%20targets%20legal%20malpractice%20complaints.mp4)
<https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%204-%20Simplest%20way%20to%20sabotage%20targets%20legal%20malpractice%20complaints.mp4>

[Being targeted by an attorney network 5- Networks of collaborating attorneys can be mapped.mp4](https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%205-%20Networks%20of%20collaborating%20attorneys%20can%20be%20mapped.mp4)
<https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%205-%20Networks%20of%20collaborating%20attorneys%20can%20be%20mapped.mp4>

Note: Due to the removal of all Active Hyperlinks (Underlined Text in Blue) when filed with the Circuit Court, the only way to view this exhibit as it was originally provided to the ARDC is to copy and paste the link at the bottom of this page in a web browser.

Exhibit 263

[https://www.fraudonthecourt.net/exhibits/Exhibit 263_Email Communications with ARDC Administrator Gutierrez.pdf](https://www.fraudonthecourt.net/exhibits/Exhibit%20263_Email%20Communications%20with%20ARDC%20Administrator%20Gutierrez.pdf)

[Being targeted by an attorney network 6- The escape hatch and cover stories.mp4](https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%20-%20The%20escape%20hatch%20and%20cover%20stories.mp4)
<https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%20-%20The%20escape%20hatch%20and%20cover%20stories.mp4>

[Being targeted by an attorney network 7- A system of suppression.mp4](https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%20-%20A%20system%20of%20suppression.mp4)
<https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%20-%20A%20system%20of%20suppression.mp4>

[Being targeted by an attorney network 8- Targeting emails.mp4](https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%20-%20Targeting%20emails.mp4)
<https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%20-%20Targeting%20emails.mp4>

[Being targeted by an attorney network 9- Burial of key evidence.mp4](https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%20-%20Burial%20of%20key%20evidence.mp4)
<https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%20-%20Burial%20of%20key%20evidence.mp4>

[Being targeted by an attorney network 10- Reverse engineering the system of suppression.mp4](https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%20-%20Reverse%20engineering%20the%20system%20of%20suppression.mp4)
<https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%20-%20Reverse%20engineering%20the%20system%20of%20suppression.mp4>

[Being targeted by an attorney network 11- How the target receives Bates numbered documents.mp4](https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%20-%20How%20the%20target%20receives%20Bates%20numbered%20documents.mp4)
<https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%20-%20How%20the%20target%20receives%20Bates%20numbered%20documents.mp4>

[Being targeted by an attorney network 12- Decoys to lock out key evidence and finish the victim off.mp4](https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%20-%20Decoys%20to%20lock%20out%20key%20evidence%20and%20finish%20the%20victim%20off.mp4)
<https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%20-%20Decoys%20to%20lock%20out%20key%20evidence%20and%20finish%20the%20victim%20off.mp4>

[Being targeted by an attorney network 13- Hoarding and sitting on key evidence and evidence of fraud.mp4](https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%20-%20Hoarding%20and%20sitting%20on%20key%20evidence%20and%20evidence%20of%20fraud.mp4)
<https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%20-%20Hoarding%20and%20sitting%20on%20key%20evidence%20and%20evidence%20of%20fraud.mp4>

[Being targeted by an attorney network 14- The legal malpractice team targeting a client.mp4](https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%20-%20The%20legal%20malpractice%20team%20targeting%20a%20client.mp4)
<https://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%20-%20The%20legal%20malpractice%20team%20targeting%20a%20client.mp4>

We also provided a detailed explanation to the ARDC (supported by evidence) of how Mr Talarico intentionally destroyed the appeal processes of his own clients in case 17LA377 and in case 22L010905 in the following video series:

[The steering of any appeal into a ditch 1- Using unequal knowledge to quickly finish off permanently disabled target.mp4](https://www.fraudonthecourt.net/video/The%20steering%20of%20any%20appeal%20into%20a%20ditch%201-%20Using%20unequal%20knowledge%20to%20quickly%20finish%20off%20permanently%20disabled%20target.mp4)
<https://www.fraudonthecourt.net/video/The%20steering%20of%20any%20appeal%20into%20a%20ditch%201-%20Using%20unequal%20knowledge%20to%20quickly%20finish%20off%20permanently%20disabled%20target.mp4>

[The steering of any appeal into a ditch 2- Setting up target to loose race against time.mp4](https://www.fraudonthecourt.net/video/The%20steering%20of%20any%20appeal%20into%20a%20ditch%202-%20Setting%20up%20target%20to%20lose%20race%20against%20time.mp4)
<https://www.fraudonthecourt.net/video/The%20steering%20of%20any%20appeal%20into%20a%20ditch%202-%20Setting%20up%20target%20to%20lose%20race%20against%20time.mp4>

[The steering of any appeal into a ditch 3- Talarico becomes the new decoy to distract from the network and system.mp4](https://www.fraudonthecourt.net/video/The%20steering%20of%20any%20appeal%20into%20a%20ditch%203-%20Talarico%20becomes%20the%20new%20decoy%20to%20distract%20from%20the%20network%20and%20system.mp4)
<https://www.fraudonthecourt.net/video/The%20steering%20of%20any%20appeal%20into%20a%20ditch%203-%20Talarico%20becomes%20the%20new%20decoy%20to%20distract%20from%20the%20network%20and%20system.mp4>

[The steering of any appeal into a ditch 4- Talarico Higher Court sabotage maps.mp4](https://www.fraudonthecourt.net/video/The%20steering%20of%20any%20appeal%20into%20a%20ditch%204-%20Talarico%20Higher%20Court%20sabotage%20maps.mp4)
<https://www.fraudonthecourt.net/video/The%20steering%20of%20any%20appeal%20into%20a%20ditch%204-%20Talarico%20Higher%20Court%20sabotage%20maps.mp4>

Everything we state in the videos and in court documents is supported by evidence. We did not make any accusation against Mr Talarico that is not supported by evidence.

Paul Dulberg
(847) 497-4250
4606 Hayden Ct.
McHenry, IL. 60051

On Jul 23, 2025, at 1:05 PM, Alphonse Talarico <contact@lawofficeofalphonsetalarico.com> wrote:

Dear Administrator Gutierrez,

This email serves as notice, pursuant to ARDC and Illinois Supreme Court Rules, of the filing of a motion to unseal certain documents in the trial court case of Dulberg v. ADR et al, 2022L010905, Cook County, Illinois, County Department, Law Division , currently pending in Calendar U Law Division, Circuit Court of Cook County.

The motion was filed on June 24, 2025, in the above said Circuit Court of Cook County, Illinois and seeks to unseal the entire file No. 2024IN00264.

The basis for the motion to unseal is that Dulberg and Kost in their post-trial motion to reconsider, and in their response to the above reference motion to unseal (BEFORE IT HAS BEEN PRESENTED) and in other public forums make the same allegations they presented before the ARDC in the above reference closed ARDC investigation and additionally accuse attorney Alphonse A. Talarico of lying to the ARDC.

Please note that this is an amendment to the attached previously filed notice of filing, and the ARDC will be provided with any court orders or decisions related to the motion to unseal as they become available.

Please see the attached Notice of Motion and Motion to Unseal.

Sincerely,

AAT

Alphonse A. Talarico/Law Office of Alphonse A. Talarico

707 Skokie Blvd., Suite 600

Northbrook, Illinois 60062

ARDC #6184530

(312) 808-1410

(312) 608-1410

Filed and set Motion to Unseal for
July 29 2025 06242025 MOT (1...



Notice of Motion July 29 2025
Motion to Unsdeal ARDC ...
2.1 MB



Endnotes

- a https://www.fraudonthecourt.net/ardc/2023-10-31_ARDC%20Complaint_THOMAS%20W%20GOOCH-SABINA%20WALCZYK.pdf
- b https://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2056_Complete%20legal%20argument%20between%20Talarico%20and%20ADR%20Systems/2025-02-24_2022L010905_Dulberg%20Response%20to%20ADR%20Petition%20for%20fees%20with%20Exhibits-File%20Stamped.pdf
- c https://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2056_Complete%20legal%20argument%20between%20Talarico%20and%20ADR%20Systems/2025-03-17_COURT%20APPROVED%20SUPPLEMENT%20TO%20DULBERGS%20RESPONSE%20TO%20ADRS%20PETITION%20FOR%20AN%20AWARD%20OF%20ATTORNEYS%20FEES%20AND%20COSTS%20with%20Exhibits_File%20Stamped.pdf
- d https://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2056_Complete%20legal%20argument%20between%20Talarico%20and%20ADR%20Systems/2025-05-20_MOTION%20TO%20RECONSIDER%20APRIL%202022%202025%20FINAL%20ORDER%20BASED%20ON%20MISTAKES%20IN%20LAW_Exhibits-Filestamped.pdf
- e https://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2056_Complete%20legal%20argument%20between%20Talarico%20and%20ADR%20Systems/2025-07-11_DULBERGS%20RESPONSE%20TO%20TALARICOS%20MOTION%20TO%20UNSEAL%20with%20exhibits-FS%202025-07-14.pdf
- f series also available at www.fraudonthecourt.net/video
- g https://www.fraudonthecourt.net/ardc/2025-01-14_IARDC%20Letter_2024IN00264_Talarico_OCR.pdf
- h https://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2066_Tables/Table%204.pdf
- i https://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2066_Tables/Table%207.pdf
- j https://www.fraudonthecourt.net/ardc/2023-11-01_R_in_ltr_c_r_jt_response_-_Clinton_et_al_.PDF
- k https://www.fraudonthecourt.net/ardc/2023-07-24_ARDC%20Complaint%20Clinton-Williams.pdf
- l https://www.fraudonthecourt.net/ardc/2024-02-27_MAINLIB-%231715962-v1-LTR_-_Closure_Ltr_to_CW_-_Clinton.pdf
- m https://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2066_Tables/Table%203.pdf
- n https://www.fraudonthecourt.net/ardc/2023-10-31_ARDC%20Complaint_KELLY%20N%20BAUDIN-WILLIAM%20RANDAL%20BAUDIN%20II.pdf
- o All attorney-client email communication between Dulberg and Talarico and Kost and Talarico (about 2600 email files) are available online at this link: https://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2050_Dulberg-Talarico%20communication%20from%20October,%202020%20onward/
- p https://www.fraudonthecourt.net/exhibits/Exhibit%20123_2018-10-02_second_amended_complaint_comments.txt
- q https://www.fraudonthecourt.net/ardc/2024-07-02_Gooch%20response%20to%20ARDC%20complaint_OCR.pdf
- r All attorney-client email communication between Dulberg and Gooch are available online at this link: <https://www.fraudonthecourt.net/exhibits/Key%20Clinton%20Folder%2015-Gooch%20communications%20sent%20to%20Williams/>
- s https://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2050_Dulberg-Talarico%20communication%20from%20October,%202020%20onward/2024-01-06_1152-32_Alphonse%20Talarico_%20contact@lawofficeofalphonsetalarico.com_Preamble.pdf