

**BEFORE THE HEARING BOARD
OF THE ILLINOIS ARDC**

IN THE MATTER OF) Commission #2020PR00064
)
)
FELIPE NERY GOMEZ)
)
ARDC #6197210)

PRO SE ANSWER TO COMPLAINT

Respondent, Felipe Nery Gomez, "Respondent", PRO SE due to the Covid, inability to retain Counsel and the refusal of ARDC to allow additional time to retain counsel, and in answers to the Complaint ("Complaint") of the Administrator of the Attorney Registration and Disciplinary Commission ("Administrator), DENIES each and every allegation of violation therein, with each paragraph of the Complaint addressed as follows:

1. Admitted.
2. Denied. Affirmatively stated that Rules of Professional Procedure 4.4 and 8.4 do not apply to Respondent in the matters cited by Complainant where he was a Plaintiff or Defendant rather than representing a client, and that regulation of Respondent's speech, as contained in the emails at issues, in the manner attempted by ARDC both prior to and in the Complaint, is prohibited by, inter alia, the U.S. and Illinois' Constitutions.
3. Denied that the EC had jurisdiction to bring the charges against a litigant not representing a client, as was Respondent in the several of the cases cited, and denied that the order cited is valid.

Affirmatively state that the matter cited by ARDC is under appeal, that the 7th Circuit affirmed on 11.5.20, and that Respondent will be seeking en banc review and then appeal to SCOTUS as to the issues raised by the EC and ARDC.

Affirmatively state that the Rules of Professional Procedure do not apply to Respondent in the matters cited by Complainant where he was a Plaintiff or Defendant rather than representing a client, and that regulation of Respondent's speech, as contained in the emails at issues, in the manner attempted by ARDC both prior to and in the Complaint is

prohibited by, inter alia, the U.S. and Illinois' Constitutions

4. Denied that the EC had jurisdiction to bring the charges against a litigant not representing a client, as was Respondent in the several of the cases cited, and denied that the order cited is valid.

COUNT 1

5. Admitted that a complaint was filed, denied that the sole Plaintiff was Arthur Gomez, affirmatively state that the Respondent was a Plaintiff as well, reflected by the Docket included herein as part of the record [ARDC Bates #AMD-000559].
6. Admitted that Respondent subpoenaed non-party BOA investigating a bank account that had been intentionally hidden by Schwab, specifically Counsel Wynne and on information and belief, Schmeltz, from Respondent, Arthur, and Counsel Prihoda, admitted that Schmeltz interfered with the Subpoena as alleged by ARDC by way of his letter, admitted that Schmeltz did not represent BOA and that BOA counsel had agreed to produce, admitted that BOA and /or Schmeltz failed to move the Court to quash the Subpoena as required by the FRCP instead of the prohibited self help utilized, admitted that BOA had agreed to produce and that Schmeltz interference caused BOA to fail to respond, causing Arthur to be further denied access to and knowledge of his assets.
7. Admitted. Affirmatively stated that the alleged RICO conduct of Schwab and Schmeltz has been complained of to the FBI and other authorities and that those complaints are open, and that Respondent will be suing Mr. Schmeltz in relation thereto, a fact he knew prior to filing his complaints with the EC.
8. Admitted that Schmeltz obstructed justice by way of the described interference with the Subpoena by rendering legal advice intended to have BAO disobey the Subpoena. Deny that the remainder of the allegations have any relevance to this matter or excuse the fact that Schmeltz admittedly interfered with the Subpoena by self help when the FRCP requires a motion to the Court. Affirmatively states that ARDC improperly attempts to use a witness that ARDC itself describes as interfering with a federal subpoena, and objects to ARDC apparently making excuses for a complaining witnesses own improper acts, as was the blocking of the subpoena, which ARDC appears to approve of.

Affirmatively state that Schmeltz's actions in advising a non-client to ignore a subpoena, in order to gain advantage in the litigation, constitutes obstruction of justice and violated the federal and Illinois rules of Professional Conduct, and that ARDC use of this conduct in attempt to prosecute Respondent for vehemently expressing opinion as to the type of people that engage in obstruction of justice is improper, violates Respondent's rights, and causes the very embarrassment to the legal system that Respondent's emails are alleged to have done despite not being widely published by Respondent, but rather by ARDC and the complaining witness Schmeltz.

9. Admitted that the email was sent, deny that it is reproduced in the context of the overall conversation. Affirmatively state that the content of the emails, speech and opinion, is protected by the U.S. and Illinois Constitutions.
10. Denied. Affirmatively state the email is opinion, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express Respondent's opinion, raise issues or attempt to obtain a favorable result in the litigation.
11. Admitted that the email was sent, deny that it is reproduced in full or in the context of the overall conversation. Affirmatively state that the content of the emails, speech and opinion, is protected by the U.S. and Illinois Constitutions.
12. Denied.
13. Admitted.
14. Denied that the emails are reproduced as sent, and that ARDC has parsed more than one email in a manner making it impossible to discern, or review, the entire emails that the material reproduced was taken from. Deny that it is reproduced in full or in the context of the overall conversation. Affirmatively state that the content of the emails, speech and opinion, is protected by the U.S. and Illinois Constitutions.
15. Denied. Affirmatively state the email is opinion, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that

any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express Respondent's opinion, raise issues or attempt to obtain a favorable result in the litigation.

16. Admitted that the email was sent, deny that it is reproduced in full or in the context of the overall conversation. Affirmatively state that the content of the emails, speech and opinion, is protected by the U.S. and Illinois Constitutions.
17. Denied. Affirmatively state the email is opinion, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express Respondent's opinion, raise issues or attempt to obtain a favorable result in the litigation.
18. Admitted that the email was sent, deny that it is reproduced in full or in the context of the overall conversation. Affirmatively state that the content of the emails, speech and opinion, is protected by the U.S. and Illinois Constitutions.
19. Denied. Affirmatively state the email is opinion, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express Respondent's opinion, raise issues or attempt to obtain a favorable result in the litigation.
20. Denied. Affirmatively state the email is opinion, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express Respondent's opinion, raise issues or attempt to obtain a favorable result in the litigation.
21. Admitted, even though the record speaks for itself [AMD #0000566], and reflects that Scmeltz took self help at least a week prior to filing the requisite motion to quash. Deny that the dismissal of 19cv0540 has any relevance to any charge against Respondent, and

affirmatively state the dismissal occurred because Etrade had sued undersigned and Arthur in 19cv0827, and it was decided to pursue Schwab there, resulting in the filing of 19cv3833, by Schmeltz naming Respondent a Defendant there, as well as him having active EC complaints filed a week prior to the filing of 19cv3833.

Affirmatively state that Schmeltz never attempted to try to work out any discovery issue with regard to the Subpoena, but rather informed undersigned of his unilateral and non-compliant interference with a Subpoena, with no Court or legal authority, which proximately contributed in large part in the delay, to this date, in Schwab releasing Arthur's funds, and Affirmatively state that the tardy filing of the 4.26.19 motion to quash is Prima Facie evidence of Schmeltz's improprieties, to which Respondent took and still takes issue with.

Affirmatively state that the claims related to 19cv0540 are currently being litigated in 19cv3833, which include a demand that Respondent release Schmeltz for all offenses, including claims arising relating to this action, in return for Schwab and Schmeltz releasing the account that the subpoena in 19cv0540 was attempting to discover, and that the matter is at impasse given Respondent's refusal to be forced to release by Schmeltz et al., before Schmeltz will agree to advise Schwab to release the account that has already been deemed Arthur's.

22. Admitted that the email was sent, deny that it is reproduced in full or in the context of the overall conversation. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions.
23. Denied. Affirmatively state the email is opinion, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express Respondent's opinion, raise issues or attempt to obtain a favorable result in the litigation.
24. Denied. Affirmatively state the emails' content is opinion, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express Respondent's opinion, raise issues or attempt to obtain a favorable result in the litigation.

Affirmatively stated the emails, sent in relation to issues arising in the case, are protected by FRE 408, and the use of same by the complainers, the EC and the ARDC here violates FRE 408.

Affirmatively state that it was and is Schmeltz and the complainers' intent not only to embarrass Respondent by publication of the emails, but also to attempt to gain a litigation advantage, by Counsel of Record, over a litigant who happens to be an attorney.

Further Affirmatively state that Rules 4.4(a) and 8.4(a) by their express terms apply to attorneys representing a client in litigation, not to a party to a lawsuit, and that Respondent was a Plaintiff in 19cv0540, 19cv0606 and 19cv905, and a Defendant in 19cv0827 and 19cv3833, all of which are the basis for the ARDC and EC claims against Respondent despite that distinction that cannot be read out of the Rules.

COUNT II

25. Admitted that the lawsuit was filed, PRO SE. Denied that any findings were made, including specifically denying that any finding was made that "he fell behind in rent payments" and Respondent puts ARDC to its proof of that assertion, and the inference that a debt had been adjudged when the settlement neither admitted nor denied anything.

Affirmatively state that Rules 4.4(a) and 8.4(a) by their express terms apply to attorneys representing a client in litigation, not to a party to a lawsuit, and that Respondent was a Plaintiff in 19cv0540, 19cv0606 and 19cv905, and a Defendant in 19cv0827 and 19cv3833, all of which are the basis for the ARDC and EC claims against Respondent despite that distinction that cannot be read out of the Rules.

Affirmatively state that ARDC pleads Count II out of Court at the outset, as it admits that Respondent was the sole Plaintiff and was Pro Se, and thus was not representing a client or acting as anything but an aggrieved citizen bringing his own claims without counsel, and thus Rules 4.4(a) and 8.4(d) cannot be applied to what is protected opinion and speech in the first place.

Affirmatively state that emails related to settlement are protected by FRE 408, and that emails that discuss settlement cannot be used by Counsel SanFelippo, the EC or ARDC, for prosecuting a sender thereof for the content therein, and those must be stricken.

Respondent MOVES this Count II be dismissed in its entirety.

26. The record speaks for itself as to filings, as do the filings themselves, and Respondent does not affirm or deny what ARDC attempts to assert in reliance on the record itself.
27. Admitted that the email was sent, deny that it is reproduced in full or in the context of the overall conversation. Affirmatively state the IRPR do not apply to a litigant, but rather the rules of contempt. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions.
28. Denied. Affirmatively state the email is opinion, did not “delay” or “burden” the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient’s, the EC, and ARDC’s election to publish the email to the World, and was not intended to do anything but express Respondent’s opinion, raise issues or attempt to obtain a favorable result in the litigation.
29. The record speaks for itself.
30. Admitted that the email was sent, deny that it is reproduced in full or in the context of the overall conversation. Affirmatively state the IRPR do not apply to a litigant, but rather the rules of contempt. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions.
31. Admitted.
32. Admitted.
33. Admitted that the email was sent, deny that it is reproduced in full or in the context of the overall conversation. Affirmatively state the IRPR do not apply to a litigant, but rather the rules of contempt. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions.
34. Denied. Affirmatively state the email is opinion, did not “delay” or “burden” the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient’s, the EC, and ARDC’s election to publish

the email to the World, and was not intended to do anything but express Respondent's opinion, raise issues or attempt to obtain a favorable result in the litigation.

35. Admitted that the email was sent, deny that it is reproduced in full or in the context of the overall conversation. Affirmatively state the IRPR do not apply to a litigant, but rather the rules of contempt. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions.

36. Denied. Affirmatively state the email is opinion, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express Respondent's opinion, raise issues or attempt to obtain a favorable result in the litigation.

37. Admitted that the email was sent, deny that it is reproduced in full or in the context of the overall conversation. Affirmatively state the IRPR do not apply to a litigant, but rather the rules of contempt. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions.

38. Denied. Affirmatively state the email is opinion, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express Respondent's opinion, raise issues or attempt to obtain a favorable result in the litigation.

39. Admitted that the email was sent, deny that it is reproduced in full or in the context of the overall conversation. Affirmatively state the IRPR do not apply to a litigant, but rather the rules of contempt. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions.

40. Denied. Affirmatively state the email is opinion, did not “delay” or “burden” the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient’s, the EC, and ARDC’s election to publish the email to the World, and was not intended to do anything but express Respondent’s opinion, raise issues or attempt to obtain a favorable result in the litigation.
41. The record speaks for itself.
42. Admitted that the email was sent, deny that it is reproduced in full or in the context of the overall conversation. Affirmatively state the IRPR do not apply to a litigant, but rather the rules of contempt. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions.
43. Denied. Affirmatively state the email is opinion, did not “delay” or “burden” the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient’s, the EC, and ARDC’s election to publish the email to the World, and was not intended to do anything but express Respondent’s opinion, raise issues or attempt to obtain a favorable result in the litigation.
44. The record speaks for itself. This email is FRE 408 protected.
45. Admitted that the email was sent, deny that it is reproduced in full or in the context of the overall conversation. Affirmatively state the IRPR do not apply to a litigant, but rather the rules of contempt. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions. This email is FRE 408 protected.
46. Denied. Affirmatively state the email is opinion, did not “delay” or “burden” the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient’s, the EC, and ARDC’s election to publish the email to the World, and was not intended to do anything but express Respondent’s opinion, raise issues or attempt to obtain a favorable result in the litigation.

47. Admitted that the email was sent, deny that it is reproduced in full or in the context of the overall conversation. Affirmatively state the IRPR do not apply to a litigant, but rather the rules of contempt. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions.
48. Denied. Affirmatively state the email is opinion, did not “delay” or “burden” the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient’s, the EC, and ARDC’s election to publish the email to the World, and was not intended to do anything but express Respondent’s opinion, raise issues or attempt to obtain a favorable result in the litigation.
49. Admitted that the email was sent, deny that it is reproduced in full or in the context of the overall conversation. Affirmatively state the IRPR do not apply to a litigant, but rather the rules of contempt. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions. This email is FRE 408 protected.
50. Denied. Affirmatively state the email is opinion, did not “delay” or “burden” the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient’s, the EC, and ARDC’s election to publish the email to the World, and was not intended to do anything but express Respondent’s opinion, raise issues or attempt to obtain a favorable result in the litigation.
51. Admitted that the email was sent, deny that it is reproduced in full or in the context of the overall conversation. Affirmatively state the IRPR do not apply to a litigant, but rather the rules of contempt. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions. This email is FRE 408 protected.
52. The record speaks for itself. This email is FRE 408 protected.

53. Admitted that the email was sent, deny that it is reproduced in full or in the context of the overall conversation. Affirmatively state the IRPR do not apply to a litigant, but rather the rules of contempt. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions. This email is FRE 408 protected.
54. Denied. Affirmatively state the email is opinion, did not “delay” or “burden” the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient’s, the EC, and ARDC’s election to publish the email to the World, and was not intended to do anything but express Respondent’s opinion, raise issues or attempt to obtain a favorable result in the litigation.
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56. Admitted that the email was sent, deny that it is reproduced in full or in the context of the overall conversation. Affirmatively state the IRPR do not apply to a litigant, but rather the rules of contempt. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions. This email is FRE 408 protected.
57. The record speaks for itself. This email is FRE 408 protected.
58. Admitted that the email was sent, deny that it is reproduced in full or in the context of the overall conversation. Affirmatively state the IRPR do not apply to a litigant, but rather the rules of contempt. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions. This email is FRE 408 protected.
59. Denied. Affirmatively state the email is opinion, did not “delay” or “burden” the

recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express Respondent's opinion, raise issues or attempt to obtain a favorable result in the litigation.

60. Admitted that the email was sent, deny that it is reproduced in full or in the context of the overall conversation. Affirmatively state the IRPR do not apply to a litigant, but rather the rules of contempt. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions. This email is FRE 408 protected.
61. Denied. Affirmatively state the email is opinion, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express Respondent's opinion, raise issues or attempt to obtain a favorable result in the litigation.
62. Admitted that the email was sent, deny that it is reproduced in full or in the context of the overall conversation. Affirmatively state the IRPR do not apply to a litigant, but rather the rules of contempt. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions. This email is FRE 408 protected.
63. Admitted that the email was sent, deny that it is reproduced in full or in the context of the overall conversation. Affirmatively state the IRPR do not apply to a litigant, but rather the rules of contempt. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions. This email is FRE 408 protected.
64. Denied. Affirmatively state the emails' content is opinion, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express

Respondent's opinion, raise issues or attempt to obtain a favorable result in the litigation.

Affirmatively stated the emails, sent in relation to issues arising in the case, are protected by FRE 408, and the use of same by the complainers, the EC and the ARDC here violates FRE 408.

Affirmatively state that it was and is Widman and Sanfelippo intent not only to embarrass Respondent by publication of the emails, but also to attempt to gain a litigation advantage, by Counsel of Record, over a litigant who happens to be an attorney. Further Affirmatively state that Rules 4.4(a) and 8.4(a) by their express terms apply to attorneys representing a client in litigation, not to a party to a lawsuit, and that Respondent was a Plaintiff in 19cv0540, 19cv0606 and 19cv905, and a Defendant in 19cv0827 and 19cv3833, all of which are the basis for the ARDC and EC claims against Respondent despite that distinction that cannot be read out of the Rules.

COUNT III

65. The record speaks for itself, and Respondent disagrees with the assertions made therein as to the alleged "removal of the...deck", and puts ARDC to its proof for that assertion.
66. The record speaks for itself.
67. The subpoena speaks for itself.
68. FRCP 26 speaks for itself.
69. The record speaks for itself, but the allegation gives insufficient information as to what emails are being referred to confirm or deny, albeit Respondent did agree to narrow the scope. In any event, the referenced emails are protected by FRE 408.
70. The record speaks for itself, but the allegation gives insufficient information as to what emails are being referred to confirm or deny, albeit Respondent did work with certain persons to obtain information, of which Mr. Scott was not one of, but rather attempted to interfere with, same by way of his, on information and belief, dual capacity as a Corporation Counsel and at the same time a Deputy Commissioner for one of his clients (DOB).

71. Admitted that a favorable result occurred early in the litigation as a result of the emails sent by Respondent, and that Rosado, not Scott, provided the information.
72. Admitted that the email was sent, deny that it is reproduced in full or in the context of the overall conversation. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions. This email is FRE 408 protected.
73. Denied. Affirmatively state the emails' content is opinion, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express Respondent's opinion, raise issues or attempt to obtain a favorable result in the litigation.
74. The record and email speak for themselves, and are FRE 408 protected.
75. Admitted that the email was sent albeit it lacks an asserted time or date, deny that it is reproduced in full or in full or in the context of the overall conversation. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions. This email is FRE 408 protected.
76. Admitted that the email was sent albeit it lacks an asserted time or date, deny that it is reproduced in full or in full or in the context of the overall conversation. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions. This email is FRE 408 protected.
77. The record speaks for itself as do any subpoenas issued, as does the alleged email, which Respondent denies is reproduced in full or in full or in the context of the overall conversation. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions. This email is FRE 408 protected.
78. The record speaks for itself as do any subpoenas issued, as does the alleged email, which Respondent denies is reproduced in full or in full or in the context of the overall conversation. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions. This email is FRE 408 protected.

79. Denied. Affirmatively state the emails' content is opinion, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express Respondent's opinion, raise issues or attempt to obtain a favorable result in the case.
80. The record speaks for itself as do any subpoenas issued, as does the alleged email, which Respondent denies is reproduced in full or in full or in the context of the overall conversation. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions. This email is FRE 408 protected.
81. Denied. Affirmatively state the emails' content is opinion, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express Respondent's opinion, raise issues or attempt to obtain a favorable result in the case.
82. The record speaks for itself as to the alleged emails, which Respondent denies are reproduced in full or in full or in the context of the overall conversation. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions.
83. Denied that Respondent left a voice mail where he sang the 99 lyrics to the alleged nursery rhyme, and puts ARDC and Ms. Ritter the their proof on same.
84. Denied. Affirmatively state the voice mails' content is opinion, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the voice mails to the World, and was not intended to do anything but express Respondent's opinion, raise issues, or attempt to obtain a favorable result in the case.
85. Admitted.
86. DENIED. The statement that a city employee works for the citizens of that city is a Truth,

and was not intended to embarrass, delay, or burden Ritter, only to express my opinion as to the relationship between a civil servant and those they are supposed to serve. Ms. Ritter refusing to shake hands is unacceptable and is in itself improper for an Attorney representing a client, especially when done in view of the opposing client and in open Court, the refusal serving to embarrass respondent, not the other way around as ARDC would have it.

87. The record speaks for itself as do any subpoenas issued, and the production had or not, as does the alleged email(s), albeit ARDC mentions several without complaining relating to the content thereof, which email(s) Respondent denies is reproduced in full or in the context of the overall conversation. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions. This email(s) is FRE 408 protected.
88. Denied. Affirmatively state the emails' content is opinion, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express Respondent's opinion, raise issues or attempt to obtain a favorable result in the case.
89. The record speaks for itself, as does the alleged email, which email(s) Respondent denies is reproduced in full or in the context of the overall conversation. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions. This email is FRE 408 protected.
90. Denied. Affirmatively state the emails' content is opinion, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express Respondent's opinion, raise issues or attempt to obtain a favorable result in the case.
91. There is insufficient information provided to admit or deny the dateless alleged summary of the alleged Ritter emails, the summary itself is denied as inaccurate and ARDC is put to its proof thereof.
92. The record speaks for itself, as does the alleged email, which email(s) Respondent denies

is reproduced in full or in the context of the overall conversation. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions.

93. Denied. Affirmatively state the emails' content is opinion as clearly stated therein, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express Respondent's opinion, raise issues or attempt to obtain a favorable result in the case. It is entirely improper for ARDC to tell Respondent he cannot call for resignation of elected officials or any elected or public servant including the past or current Mayors.
94. The record speaks for itself, as does the alleged emails of another, which email(s) Respondent denies is reproduced in full or in the context of the overall conversation.
95. The assertion here is unintelligible to Respondent, and in any event, the record speaks for itself, as does the alleged emails, which email(s) Respondent denies is reproduced in full or in the context of the overall conversation. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions, and FRE 408.
96. There is insufficient information provided to admit or deny the dateless alleged summary of the alleged Ritter emails, the summary itself is denied as inaccurate and ARDC is put to its proof thereof.
97. The record speaks for itself as to the alleged filings, as does the alleged email(s), which email(s) Respondent denies is reproduced in full or in the context of the overall conversation. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions. This email is FRE 408 protected.
98. Denied even though again unintelligible and referring to "unrelated matter" without identifying same. Affirmatively state the emails' content is opinion, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted

opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express Respondent's opinion, raise issues or attempt to obtain a favorable result in the case.

99. The record speaks for itself as to who and what FOIAs were submitted.
100. Denied. Affirmatively state the submission of FOIAs is Respondent's right under the law, and the ARDC has no place or authority to regulate how FOIAs are written or submitted, nor it is proper for ARDC to attempt to protect public officials like Ritter or any official accused of wrongdoing by alleging that an investigating attorney who FOIAs for information relating to that person violates the IRPR.
101. The record speaks for itself, as does the alleged emails, which email(s) Respondent denies is reproduced in full or in the context of the overall conversation. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions, and. FRE 408.
102. Denied. Affirmatively state the emails' content is opinion as clearly stated therein, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express Respondent's opinion, raise issues or attempt to obtain a favorable result in the case.
103. The record speaks for itself as to what or what was not produced, and Respondent DENIES that full production was had as may be inferred by the continued favorable treatment of Ms. Ritter.
104. The record speaks for itself as to what Ms. Ritter did or did not do or say, and Respondent has no recollection of this alleged communication.
105. The record speaks for itself, as does the alleged emails, which email(s) Respondent denies is reproduced in full or in the context of the overall conversation. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions and FRE 408.
106. The record speaks for itself as to what Ms. Ritter did or did not do or say, and Respondent has no recollection of this alleged communication.

107. The record speaks for itself, as does the alleged emails, which email(s) Respondent denies is reproduced in full or in the context of the overall conversation. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions and FRE 408.
108. Denied. Affirmatively state the emails' content is opinion as clearly stated therein, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express Respondent's opinion, raise issues or attempt to obtain a favorable result in the case.
109. The record speaks for itself as to what Ms. Ritter did or did not do or say, and Respondent has no recollection of this alleged communication.
110. The allegation is vague as it has no date, and in any event the record speaks for itself, as does the alleged email, which email Respondent denies is reproduced in full or in the context of the overall conversation. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions and FRE 408.
111. The allegation is vague as it has no date for the alleged email, and in any event the record speaks for itself, as does the alleged email, which email Respondent denies is reproduced in full or in the context of the overall conversation. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions and FRE 408.
112. Denied. Affirmatively state the email is opinion, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express Respondent's opinion, raise issues or attempt to obtain a favorable result in the litigation, and is FRE 408 protected.
113. The allegation is vague as it has no date for the alleged email, and in any event the record speaks for itself, as does the alleged email, which email Respondent denies is reproduced

in full or in the context of the overall conversation. Affirmatively state that the content of the email, fact, speech and opinion, is protected by the U.S. and Illinois Constitutions and FRE 408.

114. Denied. Affirmatively state the email is opinion, did not “delay” or “burden” the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient’s, the EC, and ARDC’s election to publish the email to the World, and was not intended to do anything but express Respondent’s opinion, raise issues or attempt to obtain a favorable result in the litigation, and is FRE 408 protected.
115. Deny that the alleged voice mail is accurately dated or reproduced, and put ARDC to its proof to produce the basis for this assertion.
116. Denied. Affirmatively state the email is free speech and opinion, did not “delay” or “burden” the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient’s, the EC, and ARDC’s election to publish the email to the World, and was not intended to do anything but express Respondent’s viewpoint or opinion, raise issues or attempt to obtain a favorable result in the litigation, and is FRE 408 protected.
117. The allegation is vague as it has no date for the alleged email, and in any event the record speaks for itself, as does the alleged email, which email Respondent denies is reproduced in full or in the context of the overall conversation. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions and FRE 408.
118. Denied. Affirmatively state the emails’ content is opinion as clearly stated therein, did not “delay” or “burden” the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient’s, the EC, and ARDC’s election to publish the email to the World, and was not intended to do anything but express Respondent’s opinion, raise issues or attempt to obtain a favorable result in the case.
119. The allegation is vague as it has no date for the alleged email, and in any event the record

speaks for itself, as does the alleged email, which email Respondent denies is reproduced in full or in the context of the overall conversation. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions and FRE 408.

120. The allegation is vague as it has no date for the alleged voicemail, and in any event the record speaks for itself, as does the alleged voicemail, which voicemail Respondent denies is reproduced in full or in the context of the overall conversation. Affirmatively state that the content of the voicemail, speech and opinion, is protected by the U.S. and Illinois Constitutions and FRE 408.
121. Denied. Affirmatively state the emails' content is opinion as clearly stated therein, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express Respondent's opinion, raise issues or attempt to obtain a favorable result in the case.
122. The allegation is vague as it has no date for the alleged email, and in any event the record speaks for itself, as does the alleged email, which email Respondent denies is reproduced in full or in the context of the overall conversation. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions and FRE 408.
123. Denied. Affirmatively state the emails' content is opinion as clearly stated therein, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express Respondent's opinion, raise issues or attempt to obtain a favorable result in the case.
124. The record speaks for itself as to entered motions and orders.

125. The record speaks for itself, as does the alleged emails, which email(s) Respondent denies is reproduced in full or in the context of the overall conversation. Affirmatively state that the content of the email, speech and opinion, is protected by the U.S. and Illinois Constitutions and FRE 408.
126. Denied. Affirmatively state the emails' content is opinion as clearly stated therein, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express Respondent's opinion, raise issues or attempt to obtain a favorable result in the case.
127. Insufficient information to formulate and answer, denial or admission.
128. The record speaks for itself as to orders.
129. Denied. Affirmatively state the voicemails and emails' content is fact, viewpoint or opinion, did not "delay" or "burden" the recipient in any manner, that a recipient is free to ignore or block unwanted opinion, that any embarrassment resulted from the recipient's, the EC, and ARDC's election to publish the email to the World, and was not intended to do anything but express Respondent's views or opinion, raise issues or attempt to obtain a favorable result in the litigation.

Affirmatively stated the voice and emails, sent in relation to issues arising in the case, are protected by FRE 408, and the use of same by the complainers, the EC and the ARDC here violates FRE 408.

Affirmatively state that it was Delgado and Ritter et al intent not only to embarrass Respondent by publication of the emails, but also to attempt to gain a litigation advantage, by Counsel of Record, over a litigant who happens to be an attorney. Further Affirmatively state that Rules 4.4(a) and 8.4(a) by their express terms apply to attorneys representing a client in litigation, not to a party to a lawsuit, and that Respondent was a Plaintiff in 19cv0540, 19cv0606 and 19cv905, and a Defendant in 19cv0827 and 19cv3833, all of which are the basis for the ARDC and EC claims against Respondent despite that distinction that cannot be read out of the Rules.

Submitted Pro Se By: s/ Felipe Gomez, Date: 11.20.20

FELIPE GOMEZ, PRO SE
1922 W. BELMONT AVE 1F
CHICAGO, IL 60657
312.509.2071
T312.509.2071@GMAIL.COM