2020PR00034

BEFORE THE HEARING BOARD OF THE ILLINOIS ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION

FILED
June 16, 2020
ARDC CLERK

IN THE MATTER OF: *

*

RONALD RICHARD DUEBBERT, *

* COMMISSION NO. 2020PR00034

ATTORNEY-RESPONDENT,

*

BAR No. 6203242

ANSWER TO COMPLAINT

Now comes the attorney-respondent, Ronald R. Duebbert, *pro se*, and pursuant to the Rules of the Illinois Attorney Registration and Disciplinary Commission, specifically Rules 231, 232, and 233, files his Answer, and he states as follows:

COUNT I

(False Statements to Police Concerning David Fields)

A. Background.

1. Respondent ADMITS that he met David E. Fields (hereinafter "Fields") on or about June 2013 in the parking lot of his (Respondent's) law office, where Fields approached Respondent to talk about Respondent's car. Respondent ADMITS that he developed a friendship with Fields over the next two years. Respondent Answers further and affirmatively that to the extent that the Illinois Attorney

Registration and Disciplinary Commission (hereinafter "IARDC") allegations contained in Paragraph One imply any relationship other than a friendship between Respondent and Fields, i.e., "a close personal relationship," by which the attorneys for the Judicial Inquiry Board meant a physical and/or romantic relationship, same are DENIED. Respondent ADMITS that on or about August 2015, Fields entered a plea of guilty in case 13-CF-186, and he was sentenced to and began to serve a period of incarceration.

- 2. Respondent ADMITS that he and Fields remained in contact during Fields' incarceration, including through telephone calls to, written correspondence to, and personal visits by Respondent with Fields. Respondent DENIES that he had attorney visits with Fields during his incarceration. Respondent Answers further and affirmatively that he did provide Fields with legal advice during his incarceration concerning a non-criminal matter, both by telephone and in writing and in person. Respondent ADMITS that Fields was released from prison on or about October 24, 2016.
- 3. To the extent that the IARDC alleges that Respondent submitted a written application to the Illinois Department of Corrections (its Parole branch) seeking its

¹"Attorney visits" with a client while s/he is incarcerated are very different from "regular" visits with the incarcerated person. In general, attorney visits are arranged by the attorney with the jail or prison staff, and such visits occur in private, in a private room, and they are not subject to audio overhearing. They may be subject to video recording absent audio recording. Respondent did not meet in this private "attorney-client" privileged and private manner with Fields during his incarceration.

approval for Fields to reside at Respondent's home as a secondary parole site after Fields' release from his period of incarceration, Respondent DENIES said allegations. Respondent Answers further and affirmatively, and upon his information and belief and his almost four years post-event recollection, that Fields' notified and requested that the Illinois Department of Corrections consider Respondents address to be evaluated as a secondary parole site for Fields, because at that time Field's mother's job required her to possess a firearm for her job and Fields could not parole to a residence which housed firearms. Respondent DENIES that any "application" by him for approval as a secondary parole site were "denied" by the Illinois Department of Corrections based upon the presence of firearms in Respondent's home. Respondent ANSWERS further and affirmatively that upon the initial evaluation of his Belleville, Illinois home by the Illinois Department of Corrections (IDOC) as a secondary parole site for Fields, he was informed by the evaluating IDOC officer that his residence did not meet immediate approval as a parole site for Fields for two reasons: one, handguns stored in Respondent's residential security container (in common usage, "gun safe") were not allowed to be present at the home if Fields were present; and two, Respondent did not possess a dedicated land "bare" telephone line with "no services attached" for the home. Respondent further and affirmatively Answers that on the first date of evaluation of his home as a secondary parole site for Fields

he informed the Illinois Department of Corrections personnel that the remaining firearms were already scheduled for removal to a remote site, and that AT&T would be installing a "bare" land telephone line before Fields was to be released. Furthermore, and in further Answer, Respondent states that Illinois Department of Corrections requested Respondent to call and inform them when the two impediments for Fields' parole had been remediated, and they would come and reinspect the premises as a secondary parole site for Fields. Respondent ADMITS that after Fields' release, he reported for his parole to his mother's home in Shiloh, Illinois.

4. Respondent ADMITS that after the initial inspection of his house by the Illinois

Department of Corrections he did remove certain handguns from his house and
gun safe so that Respondent's house would meet part of the IDOC criteria as a
secondary parole site for Fields. Respondent DENIES that he agreed to remove
firearms from his house so that Fields could "move in with him." Based upon his
information, belief and current recollection, Respondent ADMITS that on or about
November 4, 2016, Fields requested that his primary parole site be changed from
his mother's house in Shiloh, Illinois. Respondent further affirmatively Answers,
and again upon information, belief and present recollection, that Fields' life was
then in danger because of threats of violence directed toward him and his mother's
house not directly related to Fields, and therefore Fields requested that he be

allowed to temporarily change his parole site to Respondent's secondary parole site, a site which none of Fields' friends, family, acquaintances or others knew existed. Respondent ADMITS that on or about December 2, 2016, Fields changed his temporary parole site from Respondent's house in Belleville back to his mother's primary parole home in Shiloh, Illinois. Respondent further Answers, upon his information and belief, that within about ten (10) days of Fields moving back to his primary parole site—his mother's house is Shiloh—he was forced by the IDOC Parole Personnel to move his parole site to his grandmother's house in East St. Louis, Illinois. Respondent Answers further and affirmatively, and upon information and belief and current recollection, that he was informed that the ultimate reason for Fields' parole site move was that his mother possessed a firearm required for her then job.

B. Respondent provides a cell phone to Fields.

Fields to use for any and all uses, including contacting friends (including Respondent) and family, complying with his alcohol treatment, and doing his "business" of buying and selling of "designer" clothing. Respondent ADMITS that the cellular telephone which he provided to Fields contained in its related cellular telephone line the digits of 650, in that order. Respondent ADMITS that

Respondent purchased and owned the 650 Apple cellular device, and Respondent ADMITS that at all times he paid for the 650 Apple cellular service line in conjunction with his payment for Respondent's two (2) other cellular devices and cellular lines. Respondent ADMITS that Fields was the primary user of the Apple phone and associated cellular telephone number 650 when it was in Fields' possession. Respondent Answers further and affirmatively, and upon his information and belief and current recollections, that Respondent reacquired possession of the 650 Apple phone from Fields' mother after Fields was sentenced to a period of incarceration in the Illinois Department of Corrections.

- 6. Respondent ADMITS the allegations contained in paragraph 6. Respondent

 Answers further and affirmatively that he used his 117 cellular number for all lawful purposes.
- 7. Respondent DENIES that the 650 Apple device was returned to him by Fields.

 Respondent Answers further and affirmatively and upon his information and belief and current recollection, Respondent reacquired possession of the 650 Apple phone from Fields' mother after Fields was sentenced to a period of incarceration in the Illinois Department of Corrections. Respondent DENIES that the 650 Apple phone remained in his sole possession during the entire time Fields was incarcerated. Respondent Answers further and affirmatively that said 650 phone was generally in the possession of his law office and its staff, as well as his judicial

- campaign staff. Respondent Answers further and affirmatively that other persons working in Respondent's law office, and working on his judicial campaign, had possession of and use of said Apple phone during Fall of 2016.
- 8. Respondent ADMITS that after Fields' release from prison and the beginning of his parole, Respondent gave Fields the 650 Apple phone, and that Fields used said 650 Apple phone from his release from prison until on or about December 10-12, 2016. Respondent Answers further and affirmatively and upon his information and belief, Fields was ordered by the IDOC Parole authorities to move from his primary parole site of his mother's house to another site in East St. Louis, Illinois, Fields' grandmother's house. Respondent DENIES that he personally retook possession of the 650 Apple phone from Fields. Respondent Answers further and affirmatively that sworn testimony of other witnesses in the prior Judicial Inquiry Board proceeding tends to prove that Fields delivered the Apple phone to Respondent's then law office, where multiple persons NOT WORKING for Respondent also worked, and said phone was taken from Fields by another person not working for Respondent, and said 650 Apple phone was subsequently given to Respondent's sister, who worked for him. Respondent Answers further and affirmatively that either Respondent or his sister brought the Apple phone to Respondent's house from his then law office.
- 9. Respondent ADMITS the allegations contained in paragraph nine (9).

- 10. Respondent ADMITS that on December 29, 2016, at some time between 8 and 9

 PM, he met Fields for perhaps one minute at the Phillips gas station in East

 Belleville, Illinois, on Carlyle Avenue across from Mueller Furniture. Respondent

 ADMITS that he gave Fields his (Fields') personal effects including but not

 limited to outer clothing, under clothing, socks, a copy of Fields' birth certificate,
 and the 650 Apple phone.
- Respondent ADMITS that on December 29, 2016, both day and night, his 117 11. cellular phone was in his possession. Respondent ADMITS that he sent at least one text messages to the 650 Apple phone which was in Fields' possession, and he also received text messages from the 650 Apple phone at between 8:00 and 8:30 PM on December 29, 2016. Respondent Answers further and affirmatively that any and all calls or text messages between his 117 cellular number and his 650 cellular number (in Fields' possession) are documented in Respondent's cellular telephone records, which are part of the evidence in the prior Judicial Inquiry Board case. Respondent Answers further and affirmatively that he had no independent recollection of the later evening (about 10 PM or so and after) text communications with Fields for years after they occurred due to extreme stress, anxiety and fatigue, all of which were of long duration, and likely due to his contemporaneous head injury suffered on December 30, 2016 in the early evening hours after the two police officers departed his house for the first time.

Respondent Answers further and affirmatively that when his attorney, Mary Robinson, gave copies of Respondent's own cellular records to him on or about October 01, 2019– records which Respondent's cellular provider refused to provide to him– he did recall those text later evening (approximately 10 PM and post text messages and their content with such memory refreshment– which were primarily about Fields attending an evening movie with his then girlfriend and others.

the hours of 4 AM and 5 AM. Respondent Answers further and affirmatively, and upon his information and belief acquired solely from newspaper articles and a newspaper reporter (Madison-St. Clair Record reporter Steve Korris, who attended both trials), that evidence adduced at two murder trials indicated that Silas was murdered closer to 4 AM than 5 AM. Respondent ADMITS that Fields was identified by police as a suspect in the Carl Silas murder. Respondent Answers further and affirmatively that he (Respondent) was also identified by the police as a suspect in the Silas murder, a fact which became explicitly known to him when his then attorney, Mary Robinson, discovered such information in the discovery provided to her by the attorneys for the Judicial Inquiry Board in that proceeding, and further that no other persons other than Respondent and Fields was ever an

- active suspect in said murder, although at least one eye witness said that two black men were Carl Silas' murderers.
- 13. Respondent ADMITS that he received a phone call from a female acquaintance of Fields who informed Respondent that she believed Fields was involved in a murder. Respondent Answers further and affirmatively that he then believed that the female acquaintance was drunk during the phone call, and thus initially discounted the information. Respondent ADMITS that he spoke to Fields in the mid-morning of December 30, 2016 for a short time (identified by Respondent's cellular records, which he offered to provide to the investigating police for both the 117 and the 650 numbers), and that the call was placed by Fields' or his then girlfriend from his then girlfriend's cellular number, with a 314 area code. Respondent ADMITS the remaining allegations in paragraph 13. Respondent Answers further and affirmatively that when he acquired actual believable information that Fields' was a suspect in a murder, he also acquired the knowledge that the police had been informed that a rifle belonging to Respondent had been used to commit the Silas murder. Respondent Answers further and affirmatively that the information about Respondent's rifle having been used in any murder was false as ALL of his rifles had been removed from Respondent's home and placed in a different and secure location, locked in a gun safe in summer 2015.

- C. Respondent's false statements to investigators.
- 14. Respondent ADMITS that he received a telephone call- and upon information and belief and present four year later recollection perhaps multiple telephone calls from a person or persons who identified himself or themselves as a police officer or police officers, and who wanted to speak with Respondent about the murder of Carl Silas, and also about Fields. Respondent ADMITS that upon his arrival at his home at or about 3:45 PM, a white four door car with dark windows was parked in front of his house facing east. Respondent ADMITS that the two officers in the said white car subsequently became known to him as police officers Patrick McGuire and Timothy Lawrence. Respondent further ADMITS that said two officers and a third officer did conduct an approximately three hours long interrogation of Respondent, which interrogation also included a video interview with Respondent, as well as an audio recording. Respondent Answers further and affirmatively that a third police officer joined Officers McGuire and Lawrence when they returned to Respondent's house for the second time to continue their interrogation, which occurred over four separate interrogation sessions, and moreover that the three officers continued their interrogation of Respondent at Respondent's friend's house, at which location the said three officers came twice

²Respondent does not name his friend, with initials BJ, to protect his identity to the extent possible. Respondent further requests that the IARDC not use said person's name or any other identifying attributes if he is ever referred to in the pleadings, or if he is called to testify, to the extent that such request if able to be met while also meeting evidentiary standards.

- and departed twice. Respondent DENIES that the interrogation lasted approximately one hour. Respondent ADMITS that the two video portions of the about three hour police interrogation lasted close to one hour combined.
- 15. Respondent ADMITS that he delivered personal articles to Fields on December 29, 2016. See also Respondent's Answer to paragraph 10 above. Respondent ADMITS that Officer Lawrence conducted both of the video interview portions of the about three hour interrogation of Respondent, and that he asked about the Apple 650 phone, which Respondent answered truthfully. Respondent Answers further and affirmatively, that the video portion of his about three hour long interrogation by the police actually occurred twice, at least partially. Respondent Answers further and affirmatively that Officers Lawrence and McGuire began the video portion of the interrogation the first time, and after some amount of time, perhaps seven minutes or so (to the best of Respondent's recollection), the officers informed Respondent that the video had not been working, such that the entire video portion of the interrogation was required to be restarted at the beginning, and it was restarted, and the first questions were to be "reenacted" and/or asked and answered again. Respondent ADMITS that he made the statements quoted in paragraph 15, but he Answers further and affirmatively, that he was tired, stressed and aware that the officers were present not to "help" Respondent, but to obtain evidence against Respondent that Respondent's firearm (long gun or rifle) had

been used to murder Carl Silas, a fact which Respondent learned earlier in telephone calls to him from Belleville News-Democrat reporters George

Pawlaczyk and Beth Hundsdorfer. Respondent Answers further and affirmatively that he may have not spoken well during the video portion of the about three hour police interrogation, and in the "heat" of the moment, Respondent just clearly made a mistake about physical possession of the 650 Apple phone, which upon his information and belief and recollection he had given back to Fields the prior evening.

- 16. Respondent ADMITS that he made the statements quoted in paragraph 16 to the interrogating police officers, but states further and affirmatively in Answer, that what Respondent told the police was accurate. Respondent Answers further and affirmatively that he DID want Fields to get his own phone, but that he gave possession and use of it back to Fields so that Fields could communicate with potential job offerings, including, upon Respondent's information and belief, a decent paying job for the railroad.
- 17. Respondent DENIES the allegations contained in paragraph 17. Respondent

 Answers further and affirmatively that Fields has informed Respondent that when

 Respondent told Fields on December 30, 2016 to turn himself in to the police

 authorities to remain alive, Fields did so turn himself in (at some time prior to

- noon on December 30, 2016), and Fields has informed Respondent that he turned himself in while in possession of his cellular telephone.
- 18. Respondent DENIES that his statements to the police were false. Respondent further and affirmatively Answers that upon his recollection, information and belief he did give the 650 Apple phone back to Fields on December 29, 2016, and Respondent so told Officers Lawrence and McGuire during his about three hour interrogation by the police while Respondent and the two police officers were present in Respondent's bedroom.
- 19. Respondent DENIES that during his almost three hour interrogation by police,
 Respondent did not inform the two officers of his contact by telephone with Fields
 on the morning of December 30, 2016. Respondent ADMITS that he did not
 inform the officers of the cell call to Respondent from Fields from Fields' then
 girlfriends' number during the video (the Administrator's "interview") portion of
 the almost three hour interrogation of Respondent by police. In further affirmative
 Answer, Respondent did subsequently inform both Officers Lawrence and
 McGuire of his morning call from Fields from the then girlfriend's number when
 the two officers continued their interrogation of Respondent in Respondent's
 bedroom. Respondent Answers further and affirmatively that Officers Lawrence
 and McGuire were insistent on closely examining Respondent's custom and target
 air rifles which were stored in Respondent's gun safe— and for about twenty (20)

minutes, and that during this time Officer Lawrence continuously exposed his firearm to Respondent by pulling his sports coat away from his weapon as he stood by Respondent's four foot tall loudspeaker. In further Answer, and affirmatively, Respondent, while in his bedroom with Officers Lawrence and McGuire, informed them that Fields had told Respondent that on a prior contact with Belleville police, one of the responding Belleville police officers had placed a handgun to Fields' head during the contact with him, and "they" told Fields that "they" would shoot him if he ever were again arrested by them. In further Answer, and affirmatively, Respondent told both officers while they and Respondent were present in his bedroom that Respondent had already told Fields in Respondent's earlier telephone conversation with Fields to turn himself in to the police authorities—because alive is better than dead.

Respondent ADMITS that he did not inform Lawrence during the video portion of his interrogation that he had texted Fields on December 29, 2016—because he forgot. Officer Lawrence also did not ask that question. *Please see* Respondent's Answer to paragraph 10 above.

Respondent ADMITS that he told both officers that "And if I think of anything else if he [Fields] contacts me, I'm going to tell him to turn himself in. Number two, I will let you know. But he hasn't. I mean, here it is. I'll let you know everything." In further Answer, and affirmatively, Respondent offered to

the police his cellular records, for all of his devices, before the interview began, just like he answered Officer Lawrence's questions before the first video began, about a telephone call from Fields' female friend who appeared drunk on the call, as well as the multiple calls from persons who worked for the Belleville News-Democrat. Respondent Answers further and affirmatively that Officers Lawrence and McGuire began TWO video interview portions of the about three hour long interrogation of Respondent, claiming that the first video was somehow corrupted. Additionally, and in further Answer, Respondent absolutely did answer every single question posed to him by Officer Lawrence during the video portion of the about three hour long interrogation, and as well, Respondent Answered many more questions which were UNASKED by Officer Lawrence.³

20. Respondent ADMITS that he said the words attributed to him, but he DENIES that any information that he provided to the investigating police officers was not truthful. As the context of the quote contained in Paragraph 20 is not included in

³Upon Respondent's information and belief, the Silas murder was Officer Lawrence's first murder investigation. Officer Lawrence asked Respondent the questions, and Respondent answered them to the best of his ability. That Officers Lawrence and McGuire did not ask many questions surely is not the fault of Respondent, and over the about three hours of interrogation, the police got all of the information which Respondent possessed about the Silas murder (virtually nothing), and about Fields and his whereabouts, which was also virtually nothing, as well as the 650 Apple cell phone and its whereabouts and use to contact Respondent. It is noted herein that if Fields turned himself in to the St. Clair County Sheriff with the 650 Apple cell phone, it remains a mystery of it came to be found at Respondent's garage....

- the allegation, Respondent can NEITHER ADMIT NOR DENY the allegations contained herein, and he demands strict proof thereof.
- 21. Respondent DENIES the allegations contained in paragraph 20. Respondent further and affirmatively Answers that during the about three hour interrogation of him by the police, he did inform the police of the telephone call Respondent received from Fields on the morning hours of December 30, 2016. <u>See also</u>

 Answer to Numbers 10 and 19 above.
- 22. Respondent DENIES each and all the allegations contained in paragraph 22.

 Respondent Answers further and affirmatively that he informed police multiple times during his almost three hour interrogation, although not "on camera"— the Administrator's "interview"— that Respondent had spoken with Fields as he has identified throughout his Answers to this Complaint. *Please see* Respondents Answers to Numbers 10, 19, and 21 above.
- 23. Respondent is clueless about the Administrator's definition of "later." Nor does the Respondent know when the investigating authorities discovered that Respondent's 650 Apple phone had been used on December 29, 2016. Respondent is thus not able to EITHER ADMIT OR DENY the allegation that "Later that day, the police officers learned that the 650 phone had been used the night before Silas's killing[,]" and he therefore demands strict proof thereof.

Respondent DENIES that Officers Lawrence and McGuire departed his house and then came back and "later that day" and met with Respondent again in his bedroom. In further Answer, and affirmatively, Respondent ADMITS that Officers Lawrence and McGuire met with him in his bedroom for about twenty (20) minutes BEFORE they departed Respondent's house the first time. And Respondent states in further Answer and affirmatively that after Officers Lawrence and McGuire departed Respondent's house for the first time, they began to make many cellular telephone calls to Respondent asking Respondent if he was sure that he did not possess the 650 Apple phone. In further Answer and affirmatively, Respondent ADMITS that he spoke with three officers- Lawrence, McGuire and a third officer whose name is unknown to Respondent—while the officers stood at the entrance of Respondent's smaller garage, at which time he informed all three officers that he had fallen and been rendered unconscious by said fall. Respondent further Answers and ADMITS that he gave the 650 Apple phone to the three officers while he and the three officers were present in Respondent's kitchen, where he had placed said phone after discovering it in a small plastic storage bin in his garage in front of his car.

Respondent DENIES each and every allegation contained in paragraph 24. <u>Please</u>
 <u>see also</u> Respondent's Answers to paragraphs 10, 19, 21, 22 and 23 above.
 Respondent Answers further and affirmatively ADMITS that he did not tell the

Officers Lawrence and McGuire about the later in the evening of December 29, 2016 text messages between Respondent and Fields because Respondent did not ever remember said text messages until he first saw his own cellular records at his attorney's office on or about October 01, 2019. *See also* Respondent's Answer to Paragraph 11 above.

- 25. Respondent denies the allegations contained in Paragraph 25. <u>Please see also</u>

 Respondent's Answers to Paragraphs 19, 21, 22, 23 and 24 above.
- 26. Respondent DENIES the allegations contained in paragraph 26.

COUNT II

(Respondent's False Testimony before the Judicial Inquiry Board)

- 27. Respondent ADMITS the allegations contained in Paragraph 27. Respondent

 Answers further and affirmatively that he was interrogated by the police for about three hours on December 30, 2016, on four separate but very close in time interrogation events, and that the video portion of the interrogation— the Administrator's "interview"— was only one part of the about three hour interrogation.
- 28. Respondent ADMITS the allegations contained in Paragraph 28. Respondent states affirmatively and in further Answer that his interrogation (called an "interview" by the Administrator) took place over the period of about three hours,

and only a very small portion of said interrogation was recorded either by video or by audio.⁴ In further Answer, and upon Respondent's information and belief, Respondent discovered that during the about three hour interrogation, Respondent was an actual suspect in the murder of Silas, a fact which was carefully concealed from Respondent by Officers Lawrence and McGuire, in derogation of Illinois law.

Answers further and affirmatively that he was interrogated (not "interviewed") by the police in this matter for about three hours, most of which time was not recorded— and purposely on the part of the police— and during all that time,

Respondent cooperated with the police in every manner possible, offering them his cell phone records, allowing the police ABSENT A WARRANT to examine his air rifles and long gun firearms kept at a remote location since Summer of 2015, and

⁴In recent years, the use of multiple recorded interviews and interrogations have been used by politicians and police to pursue a process crime, because the words used by the interviewee/interogee are not identical on each occasion, even if the statement or testimony, taken as a whole, fairly is similar and means the same each time. Similarly, the bulk of some interrogations— as occurred in my case— are intentionally not recorded so that, for many reasons, including nefarious and nefarious political reasons, the police and most importantly, the people to whom the police answer higher in the food chain, can "mine" for a golden nugget with which to charge the accused of a process or other crime. Why, for instance, has the IARDC not begun a sua sponte investigation of Thomas Q. Keefe, Jr., who in December 2016 wrote a series of emails to at least Ann Maher of the Madison Record, **including on the morning and afternoon of the Silas murder**— and upon information and belief, also to the News-Democrat, basically accusing Respondent of having supplied the firearm used in the murder of Carl Silas, a murder which was then under investigation by the Major Case Squad, to wit: "It is him now the question is whether the gun came from Duebbert." (*Sic.*) But still apparently no charge of Mr. Keefe by the IARDC for impugning the integrity of an elected judge.

furthermore Respondent answered each and every question he was asked by the police, as well as many that were not. Respondent states further in Answer and affirmatively that the very reason the police carefully did NOT ask Respondent certain questions during the video portion of Respondent's interrogation was expressly to make baseless allegations against the Respondent of a process crime or "lying" at a later date—both of which actions did occur.

- 30. Respondent DENIES the allegations contained in Paragraph 30. Please <u>see also</u>Respondent's Answer to Paragraph 29 above.
- 31. Respondent DENIES that his testimony to the Judicial Inquiry Board was false, in that many months later, the exact sequence of an entire stressful, three plus hour police interrogation is an event which Respondent can remember with complete accuracy. Respondent DENIES that he did not provide all relevant information to the police on or about December 30, 2016 at some time during his about three hour interrogation, of which the video "interview" was but one part. *Please see also* Respondent's Answers to Paragraphs 19, 21, 22, 23, 24 and 29 above.
- 32. Respondent DENIES the allegations contained in Paragraph 32. Respondent

 Answers further and affirmatively, and based upon current recollection,
 information and belief, as well as his refreshed memory, that he did inform the
 police about an earlier approximately 8:00 to 8:30 PM December 29, 2016 text
 message sent by Respondent to Fields, and subsequently received from Fields, but

he did not do so during the video portion (the Administrator's "interview") of his about three hour interrogation by two and then three police officers, such interrogation occurring at two separate locations and involving four distinct meetings; only a small portion of Respondent's about three hour police interrogation was either video or audio recorded, and the majority of the interrogation does not appear on the video or audio portions of the interrogation.

- 33. Respondent DENIES that his testimony to the Judicial Inquiry Board was false.

 He testified to the best of his knowledge, information and belief five and six

 months after the stressful event and after suffering a closed head injury in the early
 evening hours of December 30, 2016. *Please see also* Respondent's Answers to
 Paragraphs 19, 21, 22, 23, 24, 29 and 31 above.
- Answer and affirmatively, Respondent was interrogated by the police for about three hours on December 30, 2016, and only a small portion of the interrogation—that portion referred to by the Administrator as the "interview"—was either video or audio recorded; the majority of the interrogation does not appear on the video or audio portions of the interrogation.
- 35. Respondent DENIES the allegations contained in Paragraph 35. Respondent

 Answers further and affirmatively that the bulk of the about three hour

 interrogation of Respondent was not recorded in any manner, and the video

recording (and the earlier several minute botched recording)— called the "interview" by the Administrator— was only a small portion of Respondent's total about three hour interrogation by the police; the majority of the interrogation does not appear on the video or audio portions of the interrogation.

- 36. Respondent DENIES the allegations contained in Paragraph 36.
- 37. Respondent ADMITS the allegations contained in Paragraph 37, but Answers further and affirmatively that the video portion of the about three hour interrogation of the Respondent by the police is but a part of the entire interrogation.
- 38. Respondent DENIES each and every allegation contained in Paragraph 38.
- 39. Respondent DENIES each and every allegation contained in Paragraph 39.
- 40. Respondent DENIES each and every allegation contained in Paragraph 40.
- All. Pursuant to Rule 231 (a) and (b) of the Rules of the Illinois Attorney and Registration Disciplinary Commission, Respondent states as follows: Respondent has been admitted to practice law in the State of Illinois in 1990, with Illinois Bar Number 06203242, under the name of Ronald Richard Duebbert; Respondent has never had a name change; Respondent is admitted to practice in the Federal District Court for the Southern District of Illinois; Respondent is not admitted to practice law in any foreign country; Respondent does not hold any other professional licenses issued by the State of Illinois or any other state.

WHEREFORE, Respondent Ronald R. Duebbert prays that the Hearing Board, conduct a hearing in this matter, and after hearing, make findings of fact as well as conclusions of fact and law in this matter, finding that the allegations of Respondent's misconduct alleged by the Administrator are without merit and not proven to the standard required for the imposition of discipline, and dismiss the said Complaint against the Respondent, and for any and all such other relief as the Hearing Board deems just and equitable under the circumstances of this case.

Respectfully submitted,

S/Ronald R. Duebbert

Ronald R. Duebbert

Pro Se

Ronald R. Duebbert Illinois Bar #06203242 P.O. Box 23685 Belleville, Illinois 62223 619/974-0243 Email- rrdporsche911s@yahoo.com

/Answer ARDC 1

CERTIFICATE OF SERVICE

The undersigned certifies that a complete copy of the foregoing and attached document [RESPONDENT'S RONALD R. DUEBBERT'S ANSWER TO COMPLAINT] was served upon the attorneys of record of all parties to the above cause, as follows:

- 1. Mr. Scott Renfroe, at email srenfroe@iardc.org;
- 2. And Attorney Scot Renfroe's assistant, Vicki Andrzejewski at email vandrzejewski@iardc.org; and
- 3. ARDCeService@iardc.org

disclo	closing the same in envelopes addressed to said attorneys at their business addressed in the pleadings of record herein, with first class postage fully prepaid and	
depos	iting the same in a U.S. Post Office mail box in Belleville, Illinois on the	
15	day ofJune, 2020; mark all that apply;	
a. b. c.	by depositing in a U.S. Post Office mail box in Belleville, Illinois; and/ via facsimile to facsimile number identified herein; and/or or via hand delivery; and/or	or/
d.	Xx or via email to the email address identified above herein.	
	s/Ronald Duebbert	