2021PR00059

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

In the Matter of:

Commission No. 2021PR00059

EDWIN FRANKLIN BUSH, III

Attorney-Respondent,

No. 6322150.

NOTICE OF FILING

To: David B. Collins Counsel for the Administrator dcollins@iardc.org ARDCeService@iardc.org

On December 17, 2021, I filed the attached Answer to the Administrator's Amended Complaint.

CERTIFICATE OF DELIVERY

The undersigned hereby certifies under penalties of perjury as provided by law, pursuant to 735 ILCS 5/1-109, that the above notice and any attached pleadings were sent via [X] E-mail, [] personal delivery, [] facsimile transmission, and/or [] U.S. Mail from 8974 N. Western Avenue #114, Des Plaines, IL 60016 with proper postage pre-paid to the addresses set forth above before the time of 7:00 p.m. on the day of December 17, 2021. The e-file service provider is Odyssey eFileIL and the document is delivered to David Collins at dcollins@iardc.gov.

EDWIN F. BUSH

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ANSWER

NOW COMES Respondent, Edwin F. Bush, *pro se* pursuant to an August 10, 2021 pancreatic cancer diagnosis and unable to afford counsel, and for his answer to the Administrator's Complaint in this matter, states as follows:

ALLEGATIONS COMMON TO COUNTS I-V

1. Respondent and Erika Bush ("Erika") were married in 2008 and are the parents of two children. Their son, J.B., was born in 2011, and their daughter, A.B., was born in 2015.

Answer: Respondent admits the allegation contained in paragraph 1.

2. On February 21, 2017, Erika filed a petition for dissolution of marriage in the Circuit Court of Cook County. The case was docketed as case number 2017D230075, *In re Marriage of Erika Bush, Petitioner and Edwin F. Bush, Respondent.*

Answer: Respondent admits the allegation contained in paragraph 2.

3. Between May 2018 and June 2021, Cook County Associate Judge John T. Carr ("Judge Carr") was the judge overseeing case number 2017D230075.

Answer: Respondent admits the allegation contained in paragraph 3.

4. Attorney Steve Wasko ("Steve") has been the court-appointed guardian *ad litem* in case number 2017D230075 since June of 2018.

Answer: Respondent admits that Steve Wasko was nominally appointed the guardian *ad litem*, but failed to perform his basic duties, which is his reputation amongst the Chicago bar according

to career domestic relations attorneys (and child representatives) such as Russell Reid, Joy Feinberg, Carlton Marcyan, and Jennifer Marshall – to name a few.

5. Although Respondent has been represented by counsel at various times during the proceedings in case number 2017D230075, his actions giving rise to the misconduct alleged in this complaint took place while he was proceeding *pro se*.

Answer: Respondent denies the allegation contained in paragraph 5.

COUNT I

(False and/or reckless statements about the qualifications or integrity of a judge)

6. At 10:31 a.m. on September 15, 2020, Respondent sent an email to Attorney Steve Wasko (the *guardian ad litem* in case number 2017D230075), Attorney Evan Mammas (one of Erika's then-attorneys in case number 2017D230075), and Judge John T. Carr (the judge overseeing case number 2017D230075), copying Terry Bright (an individual in the Chief Judge's office who schedules hearings) and Attorney Caidi Vanderporten (another one of Erika's then-attorneys in case number 2017D230075). The email was in response to efforts to set a hearing date for October 21, 2020 at 11:00 a.m. and stated:

"Judge Carr said late September. I do not agree. This is child abuse, perpetuated by the court and its corrupt and incompetent officers. I further want the court to read the federal court filings, to which it can take judicial notice, and to recuse itself and apologize to me and my children. Give us a time tomorrow to reapproach."

Answer: Respondent admits the allegation contained in paragraph 6, and affirmatively notes that the excerpted statements in this e-mail are true. Respondent's comments about corrupt and incompetent officers were directed to attorneys Evan Mammas, Caidi Vanderporten and Steve Wasko. Respondent further affirmatively notes that Judge Carr was intentionally violating a December 13, 2019, order of the Illinois appellate court, which remanded the parenting time portion of the dissolution judgment entered by Judge Carr on February 13, 2019.

7. Respondent's statement that "this is child abuse, perpetuated by the court and its corrupt and incompetent officers" was false or made with reckless disregard of the truth.

Answer: Respondent denies the allegation contained in paragraph 7. Respondent affirmatively states that Dr. John Palen, the court-appointed counselor, wrote e-mails to Evan Mammas, Caidi Vanderporten and Steve Wasko alleging that they were engaging in child abuse (which is defined as neglect) and causing attachment disorder in the minor children.

For example, Dr. Palen wrote to them on December 28, 2019: "That we have been going in circles for over fourteen months about simply enabling these children to have some kind of interaction with both parents is, in my view, <u>analogous to a form of neglect that is sanctioned</u> by the court and its' officers" (emphasis added).

8. Respondent made the statement in paragraph 6, above, knowing it was false, or with reckless disregard for the truth.

Answer: Respondent denies the allegation contained in paragraph 8.

9. On September 28, 2020, a hearing was held in the dissolution proceeding on some pending motions. As Judge Carr was in the process of ruling on one of the motions, Respondent directed the following statements to Judge Carr:

"See, that's -that's why this is the clown car. You are a clown."

"You're a child abuser. I mean, honestly, I should call DCFS on you because you've abused these children for two years. What you have done and what people like you do to people all over this country is a disgrace."

Answer: Respondent admits in part and denies in part the allegation contained in paragraph 9. Respondent admits that he made those statements, but this Commission intentionally omitted the full context and the full statements. Judge Carr just made racist and demeaning comments to Respondent's approximately 25 supporters and court watchers, including an African-American woman, referring to them as the "peanut gallery." Respondent retorted by calling the court watchers akin to being packed in a clown car, which means people packed closely in one place. In addition, Judge Carr had just violated the law again, to which he admitted to and reversed himself the next day on September 29, 2020, on his own motion. Finally, Dr. Palen, the court-ordered counselor who Judge Carr appointed but refused to speak to, was telling Respondent and the other counsel that the court and its officers were engaging in child abuse. Respondent was merely repeating Dr. Palen's professional concerns, and stands by these comments independently.

10. Respondent's statements that "this is the clown car", that Judge Carr was a "clown," a "child abuser" and that Respondent "should call DCFS on [Judge Carr] because [Judge Carr] abused these children for two years", and "what [Judge Carr has] done and what people like [Judge Carr] do to people all over this country is a disgrace" were false or made with reckless disregard of the truth.

Answer: Respondent denies the allegation contained in paragraph 10. Respondent affirmatively asserts that the statement is true and accurate.

11. Respondent made the statements in paragraph 9, above, knowing they were false, or with reckless disregard for the truth.

Answer: Respondent denies the allegation contained in paragraph 11. Affirmatively, Respondent further asserts those statements are truthful and accurate, the opinion of the court's own appointed counselor, and constitutionally protected speech.

12. By reason of the conduct outlined above, Respondent has engaged in the following misconduct:

- a. making statements the lawyer knows to be false or with reckless disregard as to their truth or falsity concerning the qualifications or integrity of a judge, adjudicative officer, or public legal officer by making the statements set forth in paragraphs 4 and 7, above, in violation of Rule 8.2(a) of the Illinois Rules of Professional Conduct (2010); and
- b. conduct prejudicial to the administration of justice by making the false and/or reckless statements set forth in paragraphs 4 and 7, above, in violation of Rule 8.4(d) of the Illinois Rules of Professional Conduct (2010).

Answer: Respondent denies the allegation contained in paragraph 12. Affirmatively, Respondent notes that approximately 2/3 of civil cases have at least one *pro se* party. That a parent passed the Illinois bar exam and was admitted to practice law does not extinguish their protected speech as a parent. Nor does being a member of the bar prevent Respondent from informing Judge Carr what his own appointed counselor was trying to tell him. Judge Carr refused to speak to Dr. Palen three times from March-July, 2019, when he personally appeared in court, the last attempt on the record on July 16, 2019.

COUNT II

(Making statements with no substantial purpose other than to embarrass, delay or burden a third person in the course of pending litigation and that are prejudicial to the administration of justice)

13. On June 23, 2020, at 3:14 p.m., Respondent sent an email to Attorney Caidi Vanderporten ("Caidi"), copying Terry Bright ("Terry") and Attorney Steve Wasko ("Steve"), Erika, and Attorney Evan Mammas ("Evan") (another one of Erika's then-attorneys in case number 2017D230075 and Caidi's father). Among the statements made was:

"Caidi, I strenuously object to you being a lowlife bottomfeeder, who suborns perjury, breaks the IRPC and extorts your own client."

Answer: Respondent admits to the allegation contained in paragraph 13, but affirmatively notes that this statement is taken from a string of communications and is the end of a three-paragraph e-mail, with the last sentence omitted. This communication also arose from the December 2019 mandated remand hearing by the appellate court, which opposing counsel, the Guardian *ad Litem* and the court were purposely countermanding. Respondent further asserts that all four statements are truthful and provably so.

14. On September 18, 2020, at 6:22 p.m., Respondent sent an email to Evan, copying Terry, Steve, Judge Carr and Caidi, stating:

"IF it means your fat ass and your suborning perjury piece of shit daughter have to get an order of protection against me, we will be in court before Judge Carr before October 21, 2020 one way or the other. You are all child abusing filth, all of you. Bring it. When the justice system fails, I will have my recourse."

Answer: Respondent admits to the allegation contained in paragraph 14, and notes the Commission is fully aware this communication pertained to Erika Bush's counsel and the

Guardian *ad Litem* intentionally delaying the appellate court's ordered hearing on remand. Again, as to there being child abuse and neglect committed by the court and its officers, that was stated by Dr. John Palen in an e-mail on December 28, 2019. Another 9 months went by.

15. Respondent's statements in the June 23, 2020, and September 18, 2020, emails, referenced in paragraphs 13 and 14, above, served no purpose other than to embarrass, delay, or burden Caidi, Evan, Steve, Terry and Judge Carr.

Answer: Respondent denies the allegation contained in paragraph 15, and asserts all of those statements are truthful and accurate, and provably so. Affirmatively, Respondent was delaying nobody, he was urgently trying to have the appellate court's ordered remand hearing. Caidi Vanderporten suborned perjury on October 10, 2018 and November 30, 2018. Furthermore, Ms. Vanderporten perjured herself in court on September 28, 2020, and filed false verified pleadings on September 2 and September 24, 2020, intentionally misleading the court about the appellate order and the law of the case.

According to a private investigator who witnessed phone calls between Erika Bush and her counsels, Mammas Goldberg, LLC threatened to withdraw as Erika Bush's counsel if Erika Bush agreed to a parenting schedule, and demanded Erika Bush and Respondent's entire 401(k) account Mammas Goldberg, LLC had no right to.

- 16. By reason of the conduct described in paragraphs 13 and 14 above, Respondent has engaged in the following misconduct:
 - a. representing a client, using means that have no substantial purpose other than to embarrass, delay, or burden a third person, by conduct including, but not limited to, asserting that Caidi is a "lowlife bottomfeeder, who suborns perjury, breaks the IRPC and extorts" her own client; asserting that Evan has a "fat ass" and that his daughter (Caidi) is a "suborning perjury piece of shit daughter; and asserting that the recipients of the September 18, 2020 email (Evan, Terry, Steve, Judge Carr and Caidi) "are all child abusing filth", in violation of Rule 4.4(a) of the Illinois Rules of Professional Conduct (2010); and
 - b. conduct that is prejudicial to the administration of justice by conduct including, but not limited to, asserting that Caidi was a "lowlife bottomfeeder, who suborns perjury, breaks the IRPC and extorts" her own client; asserting that Evan has a "fat ass" and that his daughter (Caidi) is a "suborning perjury piece of shit daughter; and asserting that the recipients of the September 18, 2020 email (Evan, Terry, Steve, Judge Carr and Caidi) "are all child abusing filth", in violation of Rule 8.4(d) of the Illinois Rules of Professional Conduct (2010).

Answer: Respondent denies the allegations contained in paragraph 16, and affirmatively states the referenced statements are entirely truthful and accurate, and protected speech. Moreover, Respondent was representing himself, not a client.

COUNT III

(*Criminal conduct* — eavesdropping/secretly making audio recording — *Dr. John Palen*)

17. On December 21, 2018, Respondent made an audiotape recording of a court-ordered counseling session involving himself, his minor son, J.B. and Dr. John Palen.

Answer: Respondent admits the allegation contained in paragraph 17, and notes he not only recorded the counseling session, he recorded picking up his son from his school in Park Ridge all the way to the counseling session in Skokie. The purpose was to inoculate Respondent against allegations of coaching J.B.. Respondent knew the counseling session would go well, and that he would gather more evidence of perjury, which he did.

18. Respondent made the audiotape surreptitiously, and without the knowledge or consent of Dr. Palen.

Answer: Respondent denies the allegation contained in paragraph 18. On January 24, 2019, Steve Wasko, who made the referral for this count, testified under oath that Dr. Palen consented to Respondent recording the session. The administrator has never interviewed Dr. Palen about this allegation, despite recklessly alleging that there was not consent. Affirmatively, it was not necessary to obtain the consent of Dr. Palen to lawfully record the counseling session. Furthermore, Dr. Palen went to court three times from March to July, 2019 in attempt to tell the circuit court he had knowledge and consented to the recording, and to authenticate the contents of the recording. But Judge Carr refused to hear from Dr. Palen on all three occasions, so this evidence could never become part of the appellate record.

Affirmatively, Dr. Palen was shocked at the incompetence of the attorneys. He could not understand what the point of the counseling session was because he could not counsel J.B. individually. In addition, he was ethically barred from stating anything about the session because of "some stupid new law" called 750 ILCS 5/607.6(d) -- which was enacted in 2017 and repealed on August 13, 2021. Dr. Palen asked for notes so he could attempt to communicate something back to Steve Wasko without disclosing communications from the session. Respondent responded with a verbatim transcript so there was no loss in translation.

19. Respondent knowingly and intentionally used the recording device for the purpose of recording all or part of the counseling session.

Answer: Respondent admits the allegation contained in paragraph 19.

20. On December 21, 2018, 720 ILCS 5/14-2(a)(2) defined the offense of eavesdropping, in pertinent part, as knowingly and intentionally using an eavesdropping device in a surreptitious manner for the purpose of recording any part of a private conversation to which he is a party unless he does so with the consent of all parties to the conversation. The statute defines an "eavesdropping device" as any device capable of being used to record an oral conversation. 720 ILCS 5/14-1(a). Eavesdropping is a Class 4 or a Class 3 felony.

Answer: Respondent lacks information to admit or deny what the law was on December 21, 2018.

- 21. By reason of the conduct described in paragraphs 19-21 above, Respondent has engaged in the following misconduct:
 - a. committing a criminal act, eavesdropping, in violation of 720 ILCS 5/14-2(a)(2), that reflects adversely on the lawyer's honesty, trustworthiness or fitness as a lawyer in other respects, in violation of Rule 8.4(b) of the Illinois Rules of Professional Conduct (2010); and
 - b. conduct involving dishonesty, fraud, deceit or misrepresentation, by surreptitiously, and without the knowledge or consent of Dr. Palen, tape-recording the December 21, 2018 counseling session, as set forth in paragraphs 17-19, above, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

Answer: Respondent denies the allegation contained in paragraph 21. Affirmatively, Respondent recorded this session primarily to protect the civil rights of himself and his children, and to preserve admissible evidence. Affirmatively, this recording is protected constitutionally, under the crime-evidence exception (720 ILCS 5/14-3) as capturing evidence of perjury, as well as *In re Marriage of Gasnya v. Nixon*, 2016 IL App (4th) 150905, ¶27, *In re Marriage of Jawad*, 326 Ill. App.3d 141, 144 (2001) and *In re Marriage of Almquist*, 299 Ill. App.3d 732, 736 (1998).

The Commission fails to note that the transcript of this counseling session was relayed in a published May 12, 2021, Seventh Circuit Court of Appeals decision, *J.B. et al. v. Woodard et al.*, (7th Cir. 2021), in which Respondent challenged the constitutionality of 750 ILCS 5/607.6(d) (which was repealed on August 13, 2021):

"The domestic relations court appointed a therapist to conduct anger management counseling and permitted Edwin to have visitation with J.B. at the therapist's office on December 21, 2018. During that counseling session, J.B. said he could not remember his father ever grabbing him by the neck, had no idea why he could not see his father, and that he and A.B. were crying regularly. J.B. further reported that Erika had repeatedly slapped him and pulled his hair." *Id.* at 4.

COUNT IV

(Criminal conduct—eavesdropping/secretly making audio recording—Erika Bush)

22. On September 25, 2019, Respondent made an audiotape recording of a conversation that he had with Erika Bush.

Answer: Respondent admits to the allegation contained in paragraph 22, but notes it was hardly a conversation and the discourse was in the public view of several nurses and bystanders.

23. Respondent made the audiotape surreptitiously, and without the knowledge or consent of, Erika.

Answer: Respondent lacks knowledge to admit or deny the allegation in paragraph 23. Respondent does not know what Erika Bush knew, did not know, or should have known. Respondent was recording in a public waiting room at a pulmonologist's office at Advocate Lutheran General Hospital in Park Ridge, with his smart phone, and does not recall where his smart phone was located.

24. Respondent knowingly and intentionally used the recording device for the purpose of recording all or part of the conversation.

Answer: Respondent admits to the allegation contained in paragraph 24, and affirmatively that this recording was inherently lawful and protected, including under 720 ILCS 5/14-3. When Respondent entered the pulmonologist's office, Erika Bush immediately violated 720 ILCS 5/26-1(a)(4) by claiming she had an active order of protection that she knew had expired on November 30, 2018. Erika Bush immediately begged the nurses to call the police, while Respondent's son J.B. begged Erika Bush to stop. This was an attempt to get Respondent falsely arrested for violating an order of protection that did not exist, which was a criminal act. Erika Bush then committed perjury on October 22, 2019, by denying verbatim quotes she made in the pulmonologist's office on September 25, 2019.

25. On September 25, 2019, 720 ILCS 5/14-2(a)(2) defined the offense of eavesdropping, in pertinent part, as knowingly and intentionally using an eavesdropping device in a surreptitious manner for the purpose of recording any part of a private conversation to which he is a party unless he does so with the consent of all parties to the conversation. The statute defines an "eavesdropping device" as any device capable of being used to record an oral conversation. 720 ILCS 5/14-1(a). Eavesdropping is a Class 4 or a Class 3 felony.

Answer: Respondent lacks information to admit or deny what the law was on September 25, 2019.

- 26. By reason of the conduct described above, Respondent has engaged in the following misconduct:
 - a. committing a criminal act, eavesdropping, in violation of 720 ILCS 5/14-2(a)(2), that reflects adversely on the lawyer's honesty, trustworthiness or fitness as a lawyer in other respects, as set forth in paragraphs 22-24, above, in violation of Rule 8.4(b) of the Illinois Rules of Professional Conduct (2010); and
 - b. conduct involving dishonesty, fraud, deceit or misrepresentation, by surreptitiously, and without the knowledge or consent of Erika Bush, tape-recording their September 25, 2019 conversation, as set forth in paragraphs 22-24, above, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

Answer: Respondent denies the allegation contained in paragraph 26. Affirmatively, Respondent does not require Erika Bush's consent to record her breaking the law by lying to police. The disorderly conduct statute has been nationally famous for its non-enforcement, which Respondent complained about during his conversation with Officers Moehrlin and Czworniak of the Park Ridge Police Department. On that date, Officer Moehrlin stated to

Respondent on audio that Erika Bush "claimed she got another one," meaning an order of protection that did not exist.

COUNT V

(Criminal conduct—eavesdropping/secretly making audio recording—Dr. Ronald Dachman)

27. On March 14, 2020, Respondent made an audiotape recording of a court-ordered counseling session involving himself, his minor son, J.B., and Dr. Dachman.

Answer: Respondent admits in part and denies in part the allegation in Paragraph 27. Respondent admits to audiotaping not only the March 14, 2020, counseling session, he admits to audiotaping the March 5, 2020, counseling session. Respondent denies that this particular session was court-ordered. Dr. Dachman was appointed on September 20, 2019 to conduct "reunification counseling," and Respondent first saw his children on March 5, 2020 – five and a half months later. Respondent was concerned that Dr. Dachman was incompetent, and not meeting professional standards by drifting aimlessly without a treatment plan. Respondent had already filed two petitions for rule to show cause that Erika Bush was violating Dr. Dachman's appointment order that were never ruled upon. Despite stating an alleged concern on the record on December 20, 2019, Judge Carr never did anything to enforce the appointment order, and had no idea if or when Respondent and the children would be meeting.

28. Respondent made the audiotape surreptitiously, and without the knowledge or consent of Dr. Dachman.

Answer: Respondent denies the allegation contained in paragraph 28. Respondent repeatedly and openly told Dr. Dachman that Respondent recorded the December 21, 2018, counseling session with Dr. Palen, and even gave Dr. Dachman a copy of the transcript before March 5, 2020. Moreover, Dr. Dachman was aware that Respondent was suing in federal court to enjoin 750 ILCS 5/607.6(d). Respondent otherwise has no knowledge of what Dr. Dachman knew or did not know. Affirmatively, Respondent did not need Dr. Dachman's permission to record this counseling session for the same reasons outlined in Count III. Dr. Dachman was ethically prohibited from repeating any communications from the counseling sessions, pursuant to the old 750 ILCS 5/607.6(d) statute, which Dr. Dachman did not understand despite Respondent's attempts to explain it to him.

29. Respondent knowingly and intentionally used the recording device for the purpose of recording all or part of the counseling session.

Answer: Respondent admits to the allegation contained in paragraph 29.

30. On March 14, 2020, 720 ILCS 5/14-2(a)(2) defined the offense of eavesdropping, in pertinent part, as knowingly and intentionally using an eavesdropping device in a surreptitious manner for the purpose of recording any part of a private conversation to which he is a party unless he does so with the consent of all parties to the conversation. The statute defines an "eavesdropping device" as any device capable of being used to record an oral conversation. 720 ILCS 5/14-1(a). Eavesdropping is a Class 4 or a Class 3 felony.

Answer: Respondent lacks information to admit or deny what the law was on March 14, 2020.

- 31. By reason of the conduct described in paragraphs 27-29, above, Respondent has engaged in the following misconduct:
 - a. committing a criminal act, eavesdropping, in violation of 720 ILCS 5/14-2(a)(2), that reflects adversely on the lawyer's honesty, trustworthiness or fitness as a lawyer in other respects, as set forth in paragraphs 27-29, above, in violation of Rule 8.4(b) of the Illinois Rules of Professional Conduct (2010); and
 - b. conduct involving dishonesty, fraud, deceit or misrepresentation, by surreptitiously, and without the knowledge or consent of Dr. Dachman, tape-recording the March 14, 2020 counseling session, as set forth in paragraphs 27-29, above, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

Answer: Respondent denies the allegation contained in paragraph 31. Affirmatively, this recording was entirely lawful and protected, contains admissible evidence, and evidence of the crime of perjury and other civil violations against Respondent and his children. Just like Count III with Dr. Palen, this counseling session was privileged under 750 ILCS 5/607.6(d) until it was repealed on August 13, 2021. The corrupt and incompetent court officers intentionally ordered counseling with two different counselors, Dr. Palen and Dr. Dachman, who were statutorily and ethically barred from speaking about the counseling session, despite Judge Carr allegedly expecting a report. This was a severe act of malpractice, particularly by Steve Wasko, the alleged Guardian *ad Litem*.

ALLEGATIONS COMMON TO COUNTS VI-VII

32. Respondent and Erika Bush ("Erika") were married in 2008 and are the parents of two children. Their son, J.B., was born in 2011, and their daughter, A.B., was born in 2015.

Answer: Respondent admits the allegation contained in paragraph 32.

33. On February 21, 2017, Erika filed a petition for dissolution of marriage in the Circuit Court of Cook County. The case was docketed as case number 2017D230075, *In re Marriage of Erika Bush, Petitioner and Edwin F. Bush*, Respondent. Case number 2017D230075 remains pending.

Answer: Respondent admits the allegation contained in paragraph 33.

34. Attorney Steve Wasko ("Steve") has been the court-appointed guardian *ad litem* in case number 2017D230075 since June of 2018.

Answer: Respondent admits that Steve Wasko was nominally appointed the guardian *ad litem*, but failed to perform his basic duties, which is his reputation amongst the Chicago bar according to respected attorneys such as Russell Reid, Joy Feinberg, Carlton Marcyan, and Jennifer Marshall – to name a few.

35. The Administrator filed the original disciplinary complaint against Respondent on August 5, 2021.

Answer: Respondent admits the allegation contained in paragraph 36.

36. Respondent was served with the complaint on August 6, 2021.

Answer: Respondent admits the allegation contained in paragraph 36. On August 7, 2021, Respondent saw his primary care provider for abdominal pain and bloating, who ordered an emergency CT scan. On August 10, 2021, Respondent was diagnosed with stage four pancreatic cancer.

COUNT VI

(Making a statement with no substantial purpose other than to embarrass, delay or burden a third person in the course of pending litigation and that is prejudicial to the administration of justice – August 24, 2021)

37. On August 24, 2021 at 3:12 p.m., Respondent used his cell phone to call Steve's adult daughter, Christine Hamlin ("Christine") on her cell phone. Respondent claimed to know Steve and immediately yelled "your dad is a piece of shit mother-fucker" before hanging up.

Answer: Respondent was given a phone number in Colorado by another individual investigating Steve Wasko. Respondent called this phone number to see if this information was accurate on or about August 24, 2021 at 3:12 p.m. Respondent denies he stated "your dad is a piece of shit mother-fucker" categorically or anything similar. Respondent stated to Ms. Hamlin that her father profiteers off of children and parents by stringing out custody litigation, and that his entire family should be ashamed of themselves. This was two weeks after Respondent's cancer diagnosis, and Steve Wasko was doing nothing – which is business as usual.

38. Christine was disturbed and frightened by the call.

Answer: Respondent lacks personal information to admit or deny the allegation contained in paragraph 38. Respondent hung up after relaying his disgust.

39. Respondent's actions on August 24, 2021, referenced in paragraph 37, above, served no purpose other than to embarrass, delay, or burden Steve and Christine.

Answer: Respondent denies the allegation contained in paragraph 39. Respondent was two weeks into a terminal cancer diagnosis and was appalled that he had no contact with his children for no lawful basis, as held by the appellate court in December, 2019. Steve Wasko's performance since June 7, 2018, has ranged from grossly neglectful to intentionally stoking conflict and willfully profiteering off both Erika Bush and Respondent. That is a sad common characteristic of Chicago area domestic relations attorneys, and Mr. Wasko did this in concert with Evan Mammas and Caidi Vanderporten. When Respondent hired Todd Feiwell to be his counsel in February, 2019, Mr. Feiwell told Respondent that Steve Wasko approached him, and

said he wanted to do Mr. Feiwell a favor in the "Bush case" because Mr. Feiwell agreed to give Steve Wasko a continuance in another case. It did not make Respondent feel better that he and his children were being bartered the whole time in a horse-trading game by career family law attorneys.

40. By reason of the conduct described in paragraph 37, above, Respondent has engaged in the following misconduct:

a. in representing a client, using means that have no substantial purpose other than to embarrass, delay, or burden a third person, by conduct including, but not limited to, telephoning Steve's daughter, Christine Hamlin, and yelling "your dad is a piece of shit mother-fucker", as set forth in paragraph 37, above, in violation of Rule 4.4(a) of the Illinois Rules of Professional Conduct (2010); and

b. conduct that is prejudicial to the administration of justice by conduct including, but not limited to, telephoning Steve's daughter, Christine Hamlin, and yelling "your dad is a piece of shit mother-fucker", as set forth in paragraph 37, above, in violation of Rule 8.4(d) of the Illinois Rules of Professional Conduct (2010).

Answer: Respondent denies the allegations contained in paragraph 40. Moreover, Respondent was not representing a client, he was representing himself.

COUNT VII

(Making statements with no substantial purpose other than to embarrass, delay or burden a third person in the course of pending litigation and that are prejudicial to the administration of justice

— September 3, 2021)

41. In June of 2021, Cook County Associate Judge John T. Carr, the judge overseeing case number 2017D230075, took medical leave.

Answer: Respondent admits the allegation contained in Paragraph 41, and notes that Judge Carr went on medical leave on approximately June 21, 2021, with a brain tumor. The Cook County Domestic Relations Division has concealed the reason for his absence, in part to avoid concerns if the tumor impacted Judge Carr's frontal lobe and for how long, which could have impacted his prior rulings. On March 11, 2021, Judge Carr could not remember what happened in his courtroom two days prior. Six months later, there is no permanent replacement for Judge Carr.

42. At all times relevant to this count, Cook County Circuit Judge Grace G. Dickler acted as the Presiding Judge of the Domestic Relations Division, Calendar 1. As Presiding Judge, Judge Dickler had responsibility for obtaining coverage for Judge Carr's courtroom while he was out on leave.

Answer: Respondent admits that Judge Dickler serves as the Presiding Judge of the Domestic Relations Division, and Calendar 1, which is her individual calendar. Respondent otherwise lacks complete information of her administrative or supervisory duties, as reflected in numerous administrative orders or county rules. Numerous judges, including Judge Dickler, stood in for Calendar 24. Respondent personally appeared before Judges Timothy Murphy, Robert Johnson, Debra Walker, Andrea Schleifer, as well as Judge Dickler on Calendar 24, including on behalf of two other clients.

43. On September 3, 2021, at 12:27 p.m., Respondent sent an email to Judge Dickler, court employees Terry Bright ("Terry") and Kaye Mason ("Kaye"), Steve and Erika. The email stated:

"It has now been almost 3 years since I have seen my children. You corrupt incompetent fucking bastards.

I never did anything to any of my children EVER. FUCK YOU!!!! I am going to the media.

You have breached the appellate order for almost 2 years, abused me and my children. Burn in hell!!!!!

No regards, Edwin F. Bush" (Emphasis in original)

Answer: Respondent admits to the allegation contained in Paragraph 43, and was 3.5 weeks into a terminal pancreatic cancer diagnosis. Respondent signed this e-mail not as an attorney, but as a very disgusted and offended father. On August 17, 2021, Respondent informed Judge Robert Johnson of his diagnosis through a status call through Zoom. Judge Johnson scheduled a hearing, with an undetermined judge, for September 27, 2021 – forty days later. After the proceeding on August 17, 2021, Respondent e-mailed the court staff that was not acceptable, given Respondent's possibly very short life span. Respondent signed this e-mail as an attorney, and copied Judge Dickler as well. There was no ARDC referral on August 17, 2021. Seventeen days later, Respondent had simply had it.

Respondent had been e-mailing Judge Dickler since April 27, 2020, requesting assistance in the enforcement of the appellate order and other supervisory, as well as law enforcement concerns. *See* Group Exhibit A. Respondent never received a response, which prompted Respondent to seek a Rule 383 Supervisory Order, with Judge Dickler as the Respondent. *See Bush v. Dickler* (No. 126305), filed August 24, 2020.

With regard to Respondent "going to the media," he in fact already spoke to a Chicago Tribune reporter, who recently wrote a story about the Rebecca Firlit story. Ms. Firlit lost custody of her son because she did not have a Covid-19 antibody shot, in a *sua sponte* order by Judge James Shapiro with no motion pending. This story made international news, causing Judge Shapiro to reverse his order and recuse himself. Considering the appellate order was being broken, Respondent and others similarly situated came to the conclusion the only help was the media, after watching the media firestorm in the Firlit case.

44. On September 3, 2021, at 2:03 p.m., Terry sent an email to Respondent, asking him to please remove Judge Dickler and Kaye from his emails regarding his case.

Answer: Respondent admits to the allegation contained in Paragraph 44. Kaye Mason was Judge Robert Johnson's coordinator, and there was no reason for her to be included in communications by e-mail. On the other hand, Judge Dickler was Presiding Judge.

45. On September 3, 2021 at 2:14 p.m., Respondent replied by email to Terry's email and included Judge Dickler, Steve, Erika and Ed Bush (Respondent's father) as additional recipients. The email stated:

"I will remove Kaye. I can't even get an answer who is filling in for Judge Carr the month of September? I am not waiting any more. The incompetence of this division is beyond repair. I will make ALL you dirtbags famous." (Emphasis in original)

Answer: Respondent admits to the allegation contained in Paragraph 45. Respondent represented two other clients on Calendar 24, and witnessed hearings get canceled because of recusals or sudden unavailability of the assigned judge. Respondent was concerned that after waiting 40 days for a hearing, it would not occur. Respondent did not sign this e-mail as an attorney, and his very angry remarks are protected speech as a father.

46. Respondent's statements in the September 3, 2021 emails, referenced in paragraphs 43 and 45, above, served no purpose other than to embarrass, delay, or burden Judge Dickler, Terry, Kaye, Steve and Erika.

Answer: Respondent denies the allegation contained in Paragraph 46. Respondent was diagnosed with terminal stage four pancreatic cancer for 3.5 weeks, and the Cook County Domestic Relations Division was violating his and his children's rights to familial association for three years. Respondent wanted to see his children immediately before his possible swift demise. It is absolutely sickeningly insensitive and offensive any attorney or organization would suggest otherwise.

47. By reason of the conduct described in paragraphs 43 and 45, above, Respondent has engaged in the following misconduct:

a. in representing a client, using means that have no substantial purpose other than to embarrass, delay, or burden a third person, by conduct including, but not limited to, stating "FUCK YOU!!!!" and "burn in hell!!!" to Judge Dickler, Terry, Kaye, Steve and Erika, and calling Terry, Judge Dickler, Steve and Erika "dirtbags", as set forth in paragraphs 43 and 45, above, in violation of Rule 4.4(a) of the Illinois Rules of Professional Conduct (2010); and

b. conduct that is prejudicial to the administration of justice by conduct including, but not limited to, stating "FUCK YOU!!!!" and "burn in hell!!!" to Judge Dickler, Terry, Kaye, Steve and Erika, and calling Terry, Judge Dickler, Steve

and Erika "dirtbags", as set forth in paragraphs 43 and 45, above, in violation of Rule 8.4(d) of the Illinois Rules of Professional Conduct (2010).

Answer: Respondent denies the allegation contained in paragraph 47. Moreover, Respondent was not representing a client, he was representing himself, and asserts a privilege to commit malpractice against himself.

Judge Dickler ended up hearing Respondent's motion for a temporary parenting schedule on September 27, 2021, and October 4, 2021, and entered further orders finally granting parenting time with J.B. and A.B. On October 13, 2021, after hearing the evidence, Judge Dickler stated she does not believe "for a second" that Respondent would ever harm his children. Albeit making necessarily regrettable statements, Respondent does not believe he committed malpractice against himself. Judge Dickler and Respondent moved beyond this dispute, but the Administrator has not.

WHEREFORE, Respondent requests that this matter be dismissed in its entirety.

RESPONDENT'S DISCLOSURE PURSUANT TO COMMISSION RULE 231

- 1. On November 4, 2021, the Illinois Supreme Court issued an order suspending Respondent's license under Rule 774. The Administrator knew Respondent was hospitalized and incapacitated, and not properly served with a rule to show cause order, while battling Stage 4 pancreatic cancer, yet pursued this order.
- 2. Respondent currently holds no other professional licenses other than his license to practice law.

RESPECTFULLY SUBMITED:

EDWIN F. BUSH

Edwin F. Bush III. - No. 61448 8974 N. Western Avenue Suite #114 Des Plaines, IL 60016 (202) 487-8238

Ted.bush@comcast.net

Exhibit A

ted.bush@comcast.net

From: James Macchitelli <jimmymacclaw@gmail.com>

Sent:Friday, September 17, 2021 2:19 PMTo:ted.bush; mgerhardtlaw@gmail.comSubject:Re: Quick electronic introduction

Did you attempt to have Grace Dickler (Cook County, IL) added as a Defendant in your case? Adding Cook County and / or Grace Dickler is on my agenda in Hadzi-Tanovic's case. The Federal complaint was filed in June 2020 and Pasulka's ARDC complaint was filed or released July 2020. Aneta still has not seen her children. Judge refuses to recuse himself. Appellate Court is taking its time. And, the dad just moved his children to DuPage County and changed schools with no notice or court approval. I asked Grace Dickler for assistance as our judge refuses to recuse himself. Dickler told me she can do nothing and told me mMy relief if any must come from Appellate Court or Judicial Inquiry Board.

Obviously Grace Dickler is involved in establishing and maintaining a corrupt Cook County Family Law System and obviously Dickler is approving of the fraud. This needs to be addressed by a Federal Court or by millions of protestors. We have to get the word out more effectively.

James J. Macchitelli Attorney at Law 1051 Perimeter Drive, Suite 400 Schaumburg, Illinois 60173 847-414-4532 jimmymacclaw@gmail.com

On Fri, Sep 17, 2021 at 1:10 PM ted.bush < ted.bush@comcast.net> wrote:

I moved to have grace dickler added as a defendant. The state didn't agree. Shocker

------ Original message -----From: mgerhardtlaw@gmail.com
Date: 9/17/21 12:54 PM (GMT-06:00)
To: 'lames Macchitelli' < iimmymacclar

Sent from my Galaxy

To: 'James Macchitelli' < "ited.bush" < a href="mailto:ted.bush@comcast.net">ted.bush@comcast.net>

Subject: Quick electronic introduction

You both are in the fed courts. And are both having conversations with the ARDC.

I'll leave at that; and let you share/compare notes as you see fit.

Mick

Michael D. Gerhardt

Cell: 312-593-5100

THIS ELECTRONIC MESSAGE IS INTENDED FOR THE PERSON TO WHOM IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. If you are neither the intended recipient nor responsible for delivering the message to the intended recipient, note that any dissemination, distribution or copying of this communication is prohibited. If you have received this communication in error, please notify the sender immediately. Thank you.

CIRCULAR 230 NOTICE: In order to comply with requirements imposed by the Internal Revenue Service, this statement is included in all outgoing e-mails: (a) any U.S. federal tax advice contained in this communication is not intended and cannot be used for the purpose of avoiding tax-related penalties, and (b) no one, without our prior written consent, may use any advice contained in this transmission in promoting, marketing, or recommending any entity, investment plan, or arrangement to another taxpayer.

From: Ted Bush <ted.bush@comcast.net>
Sent: Monday, April 27, 2020 10:02 AM

To: 'grace.dickler@cookcountyil.gov'; 'timothy.murphy@cookcountyil.gov'

Subject: FW: 2017 D 230075 (IRMO Bush)/7th Circuit No. 20-1212 (J.B. et. al. v. Woodard et. al.)

Attachments: 7th Circuit appellant brief filed 20-1212.pdf

Dear Judges Dickler and Murphy,

You are copied on this letter. Before I won my appeal, I gave Judge Carr a copy of my appellant brief and he said he would throw it in the trash. I thought I would copy you on this letter, so perhaps somebody will be aware of what is occurring the Seventh Circuit Court of Appeals – because I believe I will win this case, just like I did in the state appellate court. Judge Murphy was aware of what occurred, and prompted his comment on May 21, 2019 while he was reviewing an SOJ I filed. I am strongly urging that this division start supervising its own, as Judge Murphy indicated was not occurring.

Judge Carr is on the record December 21, 2019 stating he will disregard the mandate of the appellate court. That is disqualifying and according to case law, he has no authority to issue any substantive orders. For the sake of the reputation of the domestic relations division, he should be removed before the 7th Circuit issues its ruling later this year.

Regards, Edwin F. Bush Attorney at Law Des Plaines, IL 202-487-8238

From: Ted Bush <ted.bush@comcast.net>
Sent: Sunday, April 26, 2020 12:30 AM

To: 'terry.bright@cookcountyil.gov' <terry.bright@cookcountyil.gov>

Cc: 'Caidi Vanderporten' <cmvanderporten@mammasgoldberg.com>; 'swasko@waskolaw.com'

<swasko@waskolaw.com>; 'Evan Mammas' <emammas@mammasgoldberg.com>

Subject: 2017 D 230075 (IRMO Bush)/7th Circuit No. 20-1212 (J.B. et. al. v. Woodard et. al.)

Terry et. al., hope you are doing well. Please forward this on. Best regards, Edwin F. Bush, Attorney at Law.

The Honorable John T. Carr The Daley Center 50 W. Washington, Room 1608 Chicago, Illinois 60602

cc: The Honorable Grace G. Dickler

cc: Every Domestic Relations Division Judge in Cook County

Dear Judge Carr,

It has now been over 5 months since you were reversed by the First District Appellate Court (1-19-1467) for holding an *ex parte* custody trial and breaking 750 ILCS 5/602.7 and 750 ILCS 5/401(b) in the process.

Since I have not seen my children since October 2018, I have been regularly working with various offices of the White House on the Covid-19 response, including Dr. Peter Navarro's office extensively. I have also met with Vice President Pence, four United States Senators, about a dozen U.S. Congresspersons, dozens of manufacturing executives, senior union leaders and worked with several national reporters. I succeeded in opening the only idle latex glove manufacturing plant in country, and ramping up production for PPE by the members of the manufacturing association I work for.

These businessmen and women are losing millions of dollars right now and paying people not to work. I know what an emergency looks like.

I filed an emergency motion to establish a parenting schedule after the appellate court vacated the custody judgment, and it was denied as not an emergency by Judge Baptiste several weeks ago. That is unfortunate. Adding salt to the wound, I just had an emergency motion granted in Lake County on Friday on behalf of one of my pro bono clients, who is also being wrongly deprived of access of his children.

So while we are all mostly idle, I thought I would send you a courtesy copy of the appellate brief I filed in the 7th Circuit Court of Appeals on Thursday. I am pleased to inform you that the 7th Circuit granted my motion to represent my children – which would make me the only one representing these children right now, as your buddy Steve Wasko has done absolutely nothing but string this case out and profiteer (which is his reputation across the domestic relations bar). Steve informed me he would be withdrawing, and that is a very good thing.

On May 21, 2018, Judge Timothy Murphy stated from the bench nobody is supervising DCFS, either internally or within the domestic relations division. As is usual in Illinois, the warnings of wise and distinguished voices are almost universally ignored until it is too late. Perhaps Justice Abe Fortas said it best in 1967, "Under our Constitution, the condition of being a boy does not justify a kangaroo court." *In re Gault*, 387, U.S. 1, 28 (1967) (cited on page 31 in the attached brief). According to Judge Murphy, that is apparently not a concern for most of the division.

Thanks to you, the Seventh Circuit is going to be reviewing whether the Younger abstention doctrine applies to privately initiated civil domestic relations proceedings. As the attached brief indicates, it plainly does not. *See* quotation from Judge Posner (ret.) on page 21, *quoting Lynk v. LaPorte Superior Court No. 2*, 789 F.2d 554, 558 (7th Cir. 1986).

That means that when you and your colleagues fail to follow basic constitutional safeguards, plaintiffs will be able to go straight into federal court and sue your employer – the State of Illinois. This is something your colleagues, as well as every domestic relations judge in Illinois, Wisconsin and Indiana will be able to thank you for (and likely the entire country).

Hope you are enjoying your time off, and I hope you enjoy reading this brief – although I am not sure you will because you have never read a single one of my pleadings. I have my fingers crossed for Chief Judge Wood and a few new Trump appointees. Wish me luck!

Regards, Edwin F. Bush Attorney at Law Des Plaines, IL 202-487-8238

From: Ted Bush <ted.bush@comcast.net>
Sent: Wednesday, July 8, 2020 10:35 AM

To: 'grace.dickler@cookcountyil.gov'; 'jcarr@johntcarr.com'; 'Terry Bright (Chief Judge's Office)';

'patricia.kelly@cookcountyil.gov'

Cc: 'Kristen'; 'Evan Mammas'; 'Caidi Vanderporten'; 'Erika Bush'; 'Steve Wasko'

Subject: Proper Presentment For Substitution of Judge For Cause, 2017 D 230075

Attachments: ScreenCapture_2020-7-8 09.59.07.mp4; NOP- SOJ Carr4 filed.pdf; substitution of judge for cause

carr4 filed.pdf; IRMO Bush entry of order.docx

Dear Judges Dickler and Carr,

I am so utterly fed up with the law not being followed in this division. Attached is a two minute video of a proper presentment of a verified substitution of judge for cause petition, in which I am getting purposely stonewalled.

The procedure in 735 ILCS 5/2-1001(a)(3) in this division is for a Judge to lose all jurisdiction upon a proper presentment of a SOJ for cause petition. *In re Estate of Wilson*, 238 Ill. 2d 519 (Ill. 2010). A transfer order must be issued, sending the matter to Chief Judge Dickler, who then assigns the petition to be heard by another judge in the division.

I do not have to present the petition at a scheduled hearing, especially after which Judge Carr gave us no dates at all on June 23, 2020, after I properly presented a motion to establish a parenting schedule. Attached is a draft order to transfer this matter to the presiding judge and I expect it to be signed BY SOMEBODY. I have been waiting six months since the appellate court vacated the custody judgment in this case, and this division's handling of this matter is an utter disgrace.

Get your act together and start following the law!!! Believe me there is a whole shitload of people watching this, including appellate justices in two districts.

Regards Edwin F. Bush Attorney at Law Des Plaines, IL 202-487-8238

From: Ted Bush <ted.bush@comcast.net>
Sent: Wednesday, July 8, 2020 5:38 PM

To: 'Terry Bright (Chief Judge's Office)'; 'Lauren Wynne (Chief Judge's Office)'; 'Grace Dickler (Judiciary)';

'jcarr@johntcarr.com'

Cc: 'kristenkelpsch@yahoo.com'; 'emammas@mammasgoldberg.com';

'cmvanderporten@mammasgoldberg.com'; 'erika25bush@gmail.com'; 'swasko@waskolaw.com';

'mgerhardtlaw@gmail.com'

Subject: RE: Substitution of Judge 2017 D 230075

Where are the dates Terry???? I have a very simple solution. Judge Carr should recuse himself from this case, of which he mismanaged horribly, abused two innocent children, and found by the appellate court to have broken two laws. The SOJ petition speaks for itself. Better yet he resign.

From: Terry Bright (Chief Judge's Office) <terry.bright@cookcountyil.gov>

Sent: Wednesday, July 8, 2020 5:23 PM

To: Lauren Wynne (Chief Judge's Office) <Lauren. Wynne@cookcountyil.gov>; Grace Dickler (Judiciary)

<grace.dickler@cookcountyil.gov>; jcarr@johntcarr.com; Ted Bush <ted.bush@comcast.net>

Cc: kristenkelpsch@yahoo.com; emammas@mammasgoldberg.com; cmvanderporten@mammasgoldberg.com;

erika25bush@gmail.com; swasko@waskolaw.com; mgerhardtlaw@gmail.com

Subject: Re: Substitution of Judge 2017 D 230075

PLEASE DO NOT INCLUDE JUDGE CARR ON ANY EMAILS AT ALL!! LAST TIME ASKING!!!!

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From: Ted Bush < ted.bush@comcast.net>
Sent: Wednesday, July 8, 2020 5:17:09 PM

To: Lauren Wynne (Chief Judge's Office) < Lauren. Wynne@cookcountyil.gov >; Grace Dickler (Judiciary)

<grace.dickler@cookcountyil.gov>; jcarr@johntcarr.com <jcarr@johntcarr.com>; Terry Bright (Chief Judge's Office)

<terry.bright@cookcountyil.gov>

Cc: kristenkelpsch@yahoo.com <kristenkelpsch@yahoo.com>; emammas@mammasgoldberg.com

<emammas@mammasgoldberg.com>; cmvanderporten@mammasgoldberg.com

<cmvanderporten@mammasgoldberg.com>; erika25bush@gmail.com <erika25bush@gmail.com>;

swasko@waskolaw.com <swasko@waskolaw.com>; mgerhardtlaw@gmail.com <mgerhardtlaw@gmail.com>

Subject: RE: Substitution of Judge 2017 D 230075

External Message Disclaimer

This message originated from an external source. Please use proper judgment and caution when opening attachments, clicking links, or responding to this email.

Lauren et al,

Thank you for your correspondence. I am not attempting to have ex parte communication with anyone. You will notice that all parties, including counsel, were copied in my correspondence. Attorneys write letters to the courts all the

time. It is ex parte if the other side is not notified of the correspondence, and certainly not if they are included in the correspondence.

I am writing to inform you that one of the associate judges is not following the procedure to issue a transfer order to your office. He has been breaking the law for almost two years, without any supervision. That evidence happens to reside on video, which is in your possession. The petition was properly presented, and Judge Carr is violating binding precedent of the Illinois Supreme Court by trying to retain jurisdiction over a petition he has no jurisdiction over.

As an attorney, I am writing to inform you that Order 2020 D21 is an unconstitutionally overbroad time place and manner restriction of the First Amendment, and violates due process rights to a record on appeal – and the drafters of that order should have known better (and probably do). I happen to be familiar with this, as I am the counsel who brought 2-20-0344, which is currently pending before the Second District Appellate Court as we speak (accepted today), challenging a similar rule in Lake County (attached).

I also happen to have a screenshot of Chief Judge Evans improperly citing the wrong rule on Cook County's website (68(A)(8) sic) that I referred to in the appeal, in which he is unlawfully attempting to bind the entire population to an injunctive order they were never served with. Rule 46(d)(3) does not apply as Cook County does not have an electronic recording system, unlike counties like DuPage.

The rot starts at the top. Your division needs to get its act together and start following the law instead of breaking it. Nobody is supervising these judges!!!!

I want the transfer order signed immediately!! If I need to come in and speak to someone, fine!

Regards,

Ted

P.S., I am not going away until that order is signed.

From: Lauren Wynne (Chief Judge's Office) <Lauren. Wynne@cookcountyil.gov>

Sent: Wednesday, July 8, 2020 4:02 PM To: Ted Bush <ted.bush@comcast.net>

Cc: kristenkelpsch@yahoo.com; emammas@mammasgoldberg.com; cmvanderporten@mammasgoldberg.com;

erika25bush@gmail.com; swasko@waskolaw.com
Subject: Substitution of Judge 2017 D 230075

Dear Mr. Bush.

Thank you for your recent correspondence with Presiding Judge Grace Dickler and Judge John Carr of the Domestic Relations Division of the Circuit Court of Cook County dated July 8, 2020.

Please be advised that out of court written or oral communications to the judges of the Circuit Court of Cook County regarding pending matters are known as *ex parte* communications, and pursuant to the Illinois Supreme Court and the Illinois Code of Judicial Conduct, judges are not permitted to engage in these types of communications.

I understand you have concerns regarding your Substitution of Judge petition. In order to properly bring a Substitution of Judge petition, a party must file it with the Clerk of the Circuit Court's Office, give notice to the other party, and submit the petition to the Judge to whom the substitution is being applied. Substitution of Judge petitions cannot be submitted directly to the Presiding Judge's Office. Once the petition has been properly submitted, the Judge then forwards the petition to our office to be heard by a different judge in the Division.

In response to the COVID-19 pandemic, our Division entered a series of Administrative Orders that govern the submission of petitions and motions. These orders can be found under the Domestic Relations heading here: http://www.cookcountycourt.org/HOME.aspx.

In addition, I want to make you aware, especially as an attorney, that the recording of court proceedings is prohibited by the Illinois Supreme Court and by the Domestic Relations Division of the Circuit Court of Cook County. *See* Ill. Sup. Ct. R. 46(d)(3); Ill. Sup. Ct. R. 63(a)(8); Supreme Court Remote Court Proceedings Guidance Document; Domestic Relations Division Administrative Order 2020 D 21.

Lastly, please note that, as an employee of the judiciary, I am not permitted to give litigants and attorneys legal advice. Consequently, I cannot comment on the accuracy of your attachments and whether anything needs to be updated.

Thank you,

Lauren B. Wynne

Domestic Relations Division Attorney

Circuit Court of Cook County Richard J. Daley Center 50 W. Washington, 1901D Chicago, IL 60602

Tel: (312) 603-5281 Fax: (312) 603-6453

From: Ted Bush <ted.bush@comcast.net>
Sent: Thursday, July 9, 2020 1:07 PM

To: 'Terry Bright (Chief Judge's Office)'; 'Lauren Wynne (Chief Judge's Office)'; 'Grace Dickler (Judiciary)';

'nairee.hagopian@cookcountyil.gov'

Cc: 'kristenkelpsch@yahoo.com'; 'emammas@mammasgoldberg.com';

'cmvanderporten@mammasgoldberg.com'; 'swasko@waskolaw.com'

Subject: Day 2 -- No Transfer Order Entered in 2017 D 230075

Attachments: IRMO Bush entry of order.docx; ScreenCapture_2020-7-8 09.59.07.mp4

We are now in Day 2, in which both Judge Carr and Judge Dickler have been given video evidence of a proper presentment of a SOJ petition on July 8, 2020, and no transfer order entered. Moreover, there have been no dates offered (in which Judge Carr is barred by binding Illinois Supreme Court precedent to hear a SOJ petition).

A circuit judge does not have discretion not to issue a transfer order after proper presentment of a verified SOJ for cause petition. This matter must be deemed transferred and assigned to another judge for scheduling its consideration.

Regards, Edwin F. Bush Attorney at Law Des Plaines, IL 20204878238

From: Ted Bush <ted.bush@comcast.net> Sent: Wednesday, July 8, 2020 5:38 PM

To: 'Terry Bright (Chief Judge's Office)' <terry.bright@cookcountyil.gov>; 'Lauren Wynne (Chief Judge's Office)'

<Lauren.Wynne@cookcountyil.gov>; 'Grace Dickler (Judiciary)' <grace.dickler@cookcountyil.gov>; 'jcarr@johntcarr.com'
<jcarr@johntcarr.com>

Cc: 'kristenkelpsch@yahoo.com' <kristenkelpsch@yahoo.com>; 'emammas@mammasgoldberg.com'

<emammas@mammasgoldberg.com>; 'cmvanderporten@mammasgoldberg.com'

<cmvanderporten@mammasgoldberg.com>; 'erika25bush@gmail.com' <erika25bush@gmail.com>;

'swasko@waskolaw.com' <swasko@waskolaw.com>; 'mgerhardtlaw@gmail.com' <mgerhardtlaw@gmail.com>

Subject: RE: Substitution of Judge 2017 D 230075

Where are the dates Terry???? I have a very simple solution. Judge Carr should recuse himself from this case, of which he mismanaged horribly, abused two innocent children, and found by the appellate court to have broken two laws. The SOJ petition speaks for itself. Better yet he resign.

From: Terry Bright (Chief Judge's Office) < terry.bright@cookcountyil.gov>

Sent: Wednesday, July 8, 2020 5:23 PM

To: Lauren Wynne (Chief Judge's Office) <Lauren.Wynne@cookcountyil.gov>; Grace Dickler (Judiciary)

<grace.dickler@cookcountyil.gov>; jcarr@johntcarr.com; Ted Bush <ted.bush@comcast.net>

Cc: kristenkelpsch@yahoo.com; emammas@mammasgoldberg.com; cmvanderporten@mammasgoldberg.com;

erika25bush@gmail.com; swasko@waskolaw.com; mgerhardtlaw@gmail.com

Subject: Re: Substitution of Judge 2017 D 230075

PLEASE DO NOT INCLUDE JUDGE CARR ON ANY EMAILS AT ALL!! LAST TIME ASKING!!!!

Get Outlook for Android

From: Ted Bush <ted.bush@comcast.net>
Sent: Friday, July 10, 2020 2:33 PM

To: 'Terry Bright (Chief Judge's Office)'; 'Lauren Wynne (Chief Judge's Office)'; 'Grace Dickler (Judiciary)';

'nairee.hagopian@cookcountyil.gov'

Cc: 'kristenkelpsch@yahoo.com'; 'emammas@mammasgoldberg.com';

'cmvanderporten@mammasgoldberg.com'; 'karl.simpson@cookcountyil.gov';

'swasko@waskolaw.com'; 'william.boyd@cookcountyil.gov'

Subject: Day 3 -- No Transfer Order Entered in 2017 D 230075

Attachments: ScreenCapture_2020-7-8 09.59.07.mp4; IRMO Bush entry of order.docx; substitution of judge for

cause carr4 filed.pdf

Hi all,

I went to the Daley Center today, and saw that almost nobody is working there. Except for Judge Boyd, who was nice enough to speak to me twice. I informed Judge Boyd that nobody is working on the 19th floor. Judge Boyd suggested I contact Terry Bright again. So I am.

It is now Day 3 since a transfer order has not been issued in the case of 2017 D 230075. This is the second time in 2 weeks no order was entered after properly appearing before Judge Carr. This is not acceptable. Forgive me for thinking the resistance for transferring this SOJ petition under 735 ILCS 5/2-1001(a)(3) is it will be granted under any standard. It has been almost 7 months since the judgment in this case was reversed by the appellate court.

Regards, Edwin F. Bush Attorney at Law Des Plaines, IL 202-487-8238

From: Ted Bush <ted.bush@comcast.net>
Sent: Thursday, July 9, 2020 1:07 PM

To: 'Terry Bright (Chief Judge's Office)' <terry.bright@cookcountyil.gov>; 'Lauren Wynne (Chief Judge's Office)'

<Lauren.Wynne@cookcountyil.gov>; 'Grace Dickler (Judiciary)' <grace.dickler@cookcountyil.gov>;

'nairee.hagopian@cookcountyil.gov' <nairee.hagopian@cookcountyil.gov>

Cc: 'kristenkelpsch@yahoo.com' <kristenkelpsch@yahoo.com'; 'emammas@mammasgoldberg.com'

<emammas@mammasgoldberg.com>; 'cmvanderporten@mammasgoldberg.com'

<cmvanderporten@mammasgoldberg.com>; 'swasko@waskolaw.com' <swasko@waskolaw.com>

Subject: Day 2 -- No Transfer Order Entered in 2017 D 230075

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A circuit judge does not have discretion not to issue a transfer order after proper presentment of a verified SOJ for cause petition. This matter must be deemed transferred and assigned to another judge for scheduling its consideration.

Regards, Edwin F. Bush

From: ted.bush <ted.bush@comcast.net>
Sent: Sunday, July 12, 2020 7:48 AM

cmvanderporten@mammasgoldberg.com; swasko@waskolaw.com; erika25bush@gmail.com;

terry.bright@cookcountyil.gov

Subject: Re: Day 3 -- No Transfer Order Entered in 2017 D 230075

Attachments: Untitled attachment 01778.txt; Untitled attachment 01781.txt; Untitled attachment 01784.html;

Untitled attachment 01787.txt

Lauren,

Thank you very much. As I also explained prior, citing to the O'Brien and Wilson Illinois Supreme Court cases, I filed an SOJ petition on July 6th with notice. I presented it on July 8th (proceeding recorded).

Everything in paragraph 1 of your email I did. Everything in paragraph 2 of your email Judge Carr didnt do. And he is doing in on purpose. You will understand why if you read the file-stamped petirion, which I had sent prior.

I am sure Justices Delort, Hoffman and Rochford didnt expect to spend so much time on this case to have their order openly disobeyed by Judge Carr. We will find out tomorrow morning at 10:00 am if the transfer order is not signed by then.

Regards, Ted

Sent from my Verizon, Samsung Galaxy smartphone

From: Ted Bush <ted.bush@comcast.net>
Sent: Sunday, July 12, 2020 6:28 PM

To: 'Terry Bright (Chief Judge's Office)'; 'Vasquez, Janet'; 'Déborah Tshimena'; 'Steve Wasko'; 'Caidi

Vanderporten'; 'Evan Mammas'; 'Lauren Wynne (Chief Judge's Office)'; 'Grace Dickler (Judiciary)';

'Grayson Jackson'; 'nairee.hagopian@cookcountyil.gov'

Subject: RE: [FWD: CARR ZOOM LINK]

HEARING ON WHAT? JUDGE CARR LACKS AUTHORITY TO ENTER ANY SUBSTANTIVE ORDERS ON ANYTHING. WHAT MATTERS ARE SET FOR CONSIDERATION?

LET ME GUESS, HE IS GOING TO BREAK THE LAW AND ISSUE ANOTHER SUA SPONTE ORDER LIKE HE DID ON NOVEMBER 30, 2018, AND IN COUNTLESS OTHER CASES BEFORE HIM.

JUDGE CARR SHOULD EITHER #1) RECUSE HIMSELF, #2) RESIGN, #3) SIGN THE TRANSFER ORDER, #4) ALL OF THE PREVIOUS 3.

Regards,

Ted

P.S. Dear Externs, now that you see how family court operates, I strongly suggest you drop out of law school and get as far away from the Daley Center as possible. Because the Cook County Domestic Relations Division doesn't follow the law. It is a jungle of lawlessness, profiteering, child abuse and corruption.

From: Terry Bright (Chief Judge's Office) <terry.bright@cookcountyil.gov>

Sent: Sunday, July 12, 2020 5:31 PM

To: Vasquez, Janet <jvasquez1@kentlaw.iit.edu>; Déborah Tshimena <deborahtshimena@yahoo.com>; Ted Bush

<ted.bush@comcast.net>; Steve Wasko <swasko@waskolaw.com>; Caidi Vanderporten

<cmvanderporten@mammasgoldberg.com>; Evan Mammas <emammas@mammasgoldberg.com>

Subject: Fwd: [FWD: CARR ZOOM LINK]

RE BUSH

Judge Carr along with his externs are sending you the zoom link for your hearing set for tomorrow @ 1:00

Get Outlook for Android

From: John Carr < <u>icarr@johntcarr.com</u>> Sent: Saturday, June 6, 2020 5:33:57 PM

To: Terry Bright (Chief Judge's Office) < terry.bright@cookcountyil.gov>

Subject: Fwd: [FWD: CARR ZOOM LINK]

External Message Disclaimer

This message originated from an external source. Please use proper judgment and caution when opening attachments, clicking links, or responding to this email.

Sent from my iPhone

Begin forwarded message:

From: JCARR@johntcarr.com

Date: June 5, 2020 at 9:52:23 AM CDT

To: "jcarr@johntcarr.com" <jcarr@johntcarr.com>

Subject: [FWD: CARR ZOOM LINK]

------ Original Message -------Subject: CARR ZOOM LINK From: <<u>jcarr@johntcarr.com</u>> Date: Fri, June 05, 2020 7:51 am

To: "Terry (Chief" < terry.bright@cookcountyil.gov>

https://us02web.zoom.us/j/88163142868?pwd=M1BqQnBqVW50d3QwT1q4SIFITTh

<u>LZz09</u> password: carr

From: Ted Bush <ted.bush@comcast.net>
Sent: Monday, July 13, 2020 10:22 AM

To: 'Terry Bright (Chief Judge's Office)'; 'Vasquez, Janet'; 'Déborah Tshimena'; 'Steve Wasko'; 'Caidi

Vanderporten'; 'Evan Mammas'; 'Lauren Wynne (Chief Judge's Office)'; 'Grace Dickler (Judiciary)';

'Grayson Jackson'; 'nairee.hagopian@cookcountyil.gov'; 'kristenkelpsch@yahoo.com'

Subject: RE: [FWD: CARR ZOOM LINK]

There has been no order entered in this case scheduling a matter for hearing at 1:00 p.m. today. I wanted a hearing on my emergency motion to establish a parenting schedule, which was presented on June 23, 2020 – and no order was entered after that date. On July 6, 2020, I filed an SOJ petition for cause. There is nothing that can be heard right now. What in the hell is going on. What is the hearing on??? When is someone going to come in and make Judge John Carr follow the law???

Regards, Edwin F. Bush Attorney at Law Des Plaines, IL 202-487-8238

From: Ted Bush <ted.bush@comcast.net>
Sent: Sunday, July 12, 2020 6:28 PM

To: 'Terry Bright (Chief Judge's Office)' <terry.bright@cookcountyil.gov>; 'Vasquez, Janet' <jvasquez1@kentlaw.iit.edu>; 'Déborah Tshimena' <deborahtshimena@yahoo.com>; 'Steve Wasko' <swasko@waskolaw.com>; 'Caidi Vanderporten' <cmvanderporten@mammasgoldberg.com>; 'Evan Mammas' <emammas@mammasgoldberg.com>; 'Lauren Wynne (Chief Judge's Office)' <Lauren.Wynne@cookcountyil.gov>; 'Grace Dickler (Judiciary)' <grace.dickler@cookcountyil.gov>; 'Grayson Jackson' <jgrayson378@gmail.com>; 'nairee.hagopian@cookcountyil.gov'

<nairee.hagopian@cookcountyil.gov>
Subject: RE: [FWD: CARR ZOOM LINK]

HEARING ON WHAT? JUDGE CARR LACKS AUTHORITY TO ENTER ANY SUBSTANTIVE ORDERS ON ANYTHING. WHAT MATTERS ARE SET FOR CONSIDERATION?

LET ME GUESS, HE IS GOING TO BREAK THE LAW AND ISSUE ANOTHER SUA SPONTE ORDER LIKE HE DID ON NOVEMBER 30, 2018, AND IN COUNTLESS OTHER CASES BEFORE HIM.

JUDGE CARR SHOULD EITHER #1) RECUSE HIMSELF, #2) RESIGN, #3) SIGN THE TRANSFER ORDER, #4) ALL OF THE PREVIOUS 3.

Regards, Ted

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From: Terry Bright (Chief Judge's Office) < terry.bright@cookcountyil.gov>

Sent: Sunday, July 12, 2020 5:31 PM

To: Vasquez, Janet <<u>jvasquez1@kentlaw.iit.edu</u>>; Déborah Tshimena <<u>deborahtshimena@yahoo.com</u>>; Ted Bush

<ted.bush@comcast.net>; Steve Wasko <swasko@waskolaw.com>; Caidi Vanderporten

<cmvanderporten@mammasgoldberg.com>; Evan Mammas <emammas@mammasgoldberg.com>

Subject: Fwd: [FWD: CARR ZOOM LINK]

RE BUSH

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Get Outlook for Android

From: John Carr < <u>icarr@johntcarr.com</u>> Sent: Saturday, June 6, 2020 5:33:57 PM

To: Terry Bright (Chief Judge's Office) < terry.bright@cookcountyil.gov>

Subject: Fwd: [FWD: CARR ZOOM LINK]

External Message Disclaimer

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From: JCARR@johntcarr.com

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Subject: [FWD: CARR ZOOM LINK]

------ Original Message -------Subject: CARR ZOOM LINK From: <<u>jcarr@johntcarr.com</u>> Date: Fri, June 05, 2020 7:51 am

To: "Terry (Chief" < terry.bright@cookcountyil.gov>

https://us02web.zoom.us/j/88163142868?pwd=M1BqQnBqVW50d3QwT1g4SIFITTh

<u>LZz09</u> password: carr

From: Ted Bush <ted.bush@comcast.net>
Sent: Monday, July 13, 2020 10:59 AM

To: 'Terry Bright (Chief Judge's Office)'; 'Lauren Wynne (Chief Judge's Office)'; 'Grace Dickler (Judiciary)';

'nairee.hagopian@cookcountyil.gov'; 'Griffis, Carson'

Cc: 'kristenkelpsch@yahoo.com'; 'emammas@mammasgoldberg.com';

'cmvanderporten@mammasgoldberg.com'; 'swasko@waskolaw.com'

Subject: Day 4 -- No Transfer Order Entered in 2017 D 230075

Attachments: 7th Circuit appellant brief filed 20-1212.pdf; substitution of judge for cause carr4 filed.pdf; IRMO

Bush entry of order.docx

Hi everyone,

I wanted to introduce you to Carson Griffis of the Illinois Attorney General's Office. Carson has the unenviable job of attempting to clean up the mess exacerbated by Judge Carr and this division continually violating the laws and public policy of the State of Illinois, as well as the Illinois and United States Constitutions.

Carson has to file an appellee brief in J.B. v. Woodard (7th Cir. No. 20-1212) by July 27th, in which the 7th Circuit Court of Appeals is considering the applicability of the Younger abstention doctrine to privately-initiated domestic relations suits. This case would make it far easier to sue state actors in federal court without having to exhaust state-level remedies. It would also make it much easier to file class action suits regarding matters arising from domestic relations courts, and to challenge unconstitutional state laws and practices.

I am sure Carson would be benefitted from having the resources of the greatest legal minds of the Cook County Domestic Relations Division, and I hope sincerely you can help him file his brief. Attached is the appellant brief he has to reply to.

Secondly, if I were representing state actors as defendants, I would be very concerned about Judge Carr openly thumbing his nose at the requirement of the appellate court to hold an impartial fair hearing, and claiming what the unlawful acts he already committed were "right" (see page 8 of petition). When this case is remanded back to the United States District Court, the personal liability facing the three state actor Defendants in J.B. v. Woodard will be only greater. There are de facto parties to the case, and another reason why Judge Carr should recuse himself.

Regards, Edwin F. Bush Attorney at Law Des Plaines, IL 202-487-8238

From: Ted Bush <ted.bush@comcast.net>

Sent: Friday, July 10, 2020 2:33 PM

To: 'Terry Bright (Chief Judge's Office)' <terry.bright@cookcountyil.gov>; 'Lauren Wynne (Chief Judge's Office)'

<Lauren.Wynne@cookcountyil.gov>; 'Grace Dickler (Judiciary)' <grace.dickler@cookcountyil.gov>;

'nairee.hagopian@cookcountyil.gov' <nairee.hagopian@cookcountyil.gov>

Cc: 'kristenkelpsch@yahoo.com' <kristenkelpsch@yahoo.com'; 'emammas@mammasgoldberg.com'

<emammas@mammasgoldberg.com>; 'cmvanderporten@mammasgoldberg.com'

<cmvanderporten@mammasgoldberg.com>; 'karl.simpson@cookcountyil.gov' <karl.simpson@cookcountyil.gov>;

'swasko@waskolaw.com' <swasko@waskolaw.com>; 'william.boyd@cookcountyil.gov'

From: Ted Bush <ted.bush@comcast.net>

Sent: Monday, July 13, 2020 11:51 AM

To: 'Griffis, Carson'; 'Terry Bright (Chief Judge's Office)'; 'Lauren Wynne (Chief Judge's Office)'; 'Grace Dickler (Judiciary)'; 'nairee.hagopian@cookcountyil.gov'

Cc: 'kristenkelpsch@yahoo.com'; 'emammas@mammasgoldberg.com';

'cmvanderporten@mammasgoldberg.com'; 'swasko@waskolaw.com'

Subject: RE: Day 4 -- No Transfer Order Entered in 2017 D 230075

Carson,

Your clients continue to face damages for Counts II and III of the J.B. v. Woodard complaint, under the 42 USC 1983 causation doctrine. As I stated before, if I were in your shoes, I would be very concerned the same judge is continuing to expose your clients to further liability, ignoring a binding appellate court decision and openly prejudging an appellate court-ordered hearing on remand. They are de facto parties to this case (not de jure) by virtue of theirs and Judge Carr's actions interjecting themselves into a private domestic relations suit without a prior court order under 20 ILCS 505/5(t).

It was Judge Carr himself who said on November 30, 2018, in shirking his role to oversee DCFS: "If you think DCFS broke their rules, take it up with DCFS."

I did, and this is an ongoing conflict of interest.

Regards, Ted

From: Griffis, Carson < CGriffis@atg.state.il.us>

Sent: Monday, July 13, 2020 11:35 AM

To: Ted Bush <ted.bush@comcast.net>; 'Terry Bright (Chief Judge's Office)' <terry.bright@cookcountyil.gov>; 'Lauren

Wynne (Chief Judge's Office)' <Lauren.Wynne@cookcountyil.gov>; 'Grace Dickler (Judiciary)'

<grace.dickler@cookcountyil.gov>; nairee.hagopian@cookcountyil.gov

Cc: kristenkelpsch@yahoo.com; emammas@mammasgoldberg.com; cmvanderporten@mammasgoldberg.com;

swasko@waskolaw.com

Subject: Re: Day 4 -- No Transfer Order Entered in 2017 D 230075

Ted,

As I have explained before, I represent the State defendants only in *J.B. v. Woodard*, No. 20-1212, in the Seventh Circuit. I do not represent any parties in the Domestic Relations Division.

Best,

Carson R. Griffis
Assistant Attorney General
Civil Appeals Division
Office of the Illinois Attorney General
100 West Randolph Street, 12th Floor
Chicago, Illinois 60601
(312) 814-2575
cgriffis@atg.state.il.us

From: Ted Bush < ted.bush@comcast.net > Sent: Monday, July 13, 2020 10:59 AM

To: 'Terry Bright (Chief Judge's Office)'; 'Lauren Wynne (Chief Judge's Office)'; 'Grace Dickler (Judiciary)';

nairee.hagopian@cookcountyil.gov; Griffis, Carson

 $\textbf{Cc:} \ \underline{kristenkelpsch@yahoo.com}; \ \underline{emammas@mammasgoldberg.com}; \ \underline{cmvanderporten@mammasgoldberg.com}; \\$

swasko@waskolaw.com

Subject: Day 4 -- No Transfer Order Entered in 2017 D 230075

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Regards, Edwin F. Bush Attorney at Law Des Plaines, IL 202-487-8238

From: Ted Bush < ted.bush@comcast.net >

Sent: Friday, July 10, 2020 2:33 PM

To: 'Terry Bright (Chief Judge's Office)' < terry.bright@cookcountyil.gov >; 'Lauren Wynne (Chief Judge's Office)'

<Lauren.Wynne@cookcountyil.gov>; 'Grace Dickler (Judiciary)' <grace.dickler@cookcountyil.gov>;

'nairee.hagopian@cookcountyil.gov' <nairee.hagopian@cookcountyil.gov>

Cc: 'kristenkelpsch@yahoo.com' < kristenkelpsch@yahoo.com'>; 'emammas@mammasgoldberg.com'

<emammas@mammasgoldberg.com>; 'cmvanderporten@mammasgoldberg.com'

From: Ted Bush <ted.bush@comcast.net>
Sent: Monday, July 20, 2020 12:22 PM

To: 'Griffis, Carson'; 'Lauren Wynne (Chief Judge's Office)'; 'Grace Dickler (Judiciary)'

Subject: FW: 20-1212 J. B., et al v. Tiffany Woodard, et al "Response"

Attachments: 7th circuit response to extension of time3 filed.pdf

All, this was filed today. I sincerely hope the Domestic Relations Division and State Attorney General's Office work together and bring forth its best arguments on the applicability of the Younger abstention doctrine to privately-initiated domestic relations suits.

Regards, Edwin F. Bush Attorney at Law Des Plaines, IL 202-487-8238

From: CA07_CMECFMail@ca7.uscourts.gov <CA07_CMECFMail@ca7.uscourts.gov>

Sent: Monday, July 20, 2020 12:15 PM

To: ted.bush@comcast.net

Subject: 20-1212 J. B., et al v. Tiffany Woodard, et al "Response"

NOTE TO PUBLIC ACCESS USERS Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing.

Seventh Circuit Court of Appeals

Notice of Docket Activity

The following transaction was entered on 07/20/2020 at 12:14:53 PM CDT and filed on 07/20/2020

Case Name: J. B., et al v. Tiffany Woodard, et al

Case Number: 20-1212

Document(s): Document(s)

Docket Text:

Filed Response by Appellants A. B., J. B. and Edwin Bush, III to Defendant-Appellee's 3rd motion for extension of time. [24][7094687] [20-1212] (Bush, Edwin)

Notice will be electronically mailed to:

Mr. Carson Griffis, Attorney Mr. Edwin Bush, III, Attorney The following document(s) are associated with this transaction:

Document Description: Response

Original Filename: 7th circuit response to extension of time3 combined.pdf

Electronic Document Stamp:

[STAMP acecfStamp_ID=1105395651 [Date=07/20/2020] [FileNumber=7094687-0]

55c3f43d54265c218fe04e44bef7]]

From: Ted Bush <ted.bush@comcast.net>
Sent: Friday, July 31, 2020 3:33 PM

To: 'nairee.hagopian@cookcountyil.gov'; 'Lauren Wynne (Chief Judge's Office)'; 'Grace Dickler (Judiciary)'

Cc: 'emammas@mammasgoldberg.com'; 'swasko@waskolaw.com'

Subject: RE: IRMO BUSH 17D 230075 Decision

Hello folks,

Just respectfully reminding that there has not been a transfer order entered yet. I suppose you may be asking why the Rule 63(D) procedures were not used in this case by Judge Rivera. If so, we have something in common.

Regards, Edwin F. Bush Attorney at Law Des Plaines, IL 202-487-8238

D. Remittal of Disqualification.

A judge disqualified by the terms of Section 3C may disclose on the record the basis of the judge's disqualification and may ask the parties and their lawyers to consider, out of the presence of the judge, whether to waive disqualification. If following disclosure of any basis for disqualification other than personal bias or prejudice concerning a party, the parties and lawyers, without participation by the judge, all agree that the judge should not be disqualified, and the judge is then willing to participate, the judge may participate in the proceeding. This agreement shall be incorporated in the record of the proceeding.

From: Ted Bush <ted.bush@comcast.net> Sent: Thursday, July 30, 2020 4:29 PM

To: 'nairee.hagopian@cookcountyil.gov' <nairee.hagopian@cookcountyil.gov>; 'Lauren Wynne (Chief Judge's Office)'

<Lauren.Wynne@cookcountyil.gov>

Cc: 'emammas@mammasgoldberg.com' <emammas@mammasgoldberg.com>; 'swasko@waskolaw.com'

<swasko@waskolaw.com>

Subject: FW: IRMO BUSH 17D 230075 Decision

Importance: High

There was no order entered by Judge Rivera. We had a hearing two weeks ago. Attached is her recusal order. Two more weeks these children were abused.

I have attached the offending e-mail, and asked Judge Rivera's clerk they be included in her order. The string speaks for itself.

I await the next transfer order. I would suggest Judge Dickler hear this at this point.

From: Kristen < kristenkelpsch@yahoo.com > Sent: Wednesday, July 29, 2020 5:06 PM

To: DRDivOrders Cal41 < DRDivOrdersCal41@cookcountycourt.com >; Elizabeth.Loredo-Rivera@cookcountyil.gov

Cc: ted.bush@comcast.net; Steve Wasko <swasko@waskolaw.com>; emammas@mammasgoldberg.com

Subject: Re: 2017 D 230075 IRMO Bush Substitution Petition & Exhibits

Hello Judge Rivera,

My name is Kristen Kelpsch, I'm Ted Bush's girlfriend and was the person included in the previous email, as I asked him this morning if he heard anything about the substitution of judge. With all due respect, I believe I'm a party in this case, as I have spoken to and emailed Steve Wasko, the child rep numerous times, including a 40 min phone conversation back in 2019, and he didn't report what I had to say. In addition, Judge Carr acted in the same manner as he ignored my written affidavit and also didn't want to speak to me when I appeared at court in 2019.

I'm a special education teacher, I have a Masters Degree in Special Education and I have been teaching for 20 years. I have two daughters, Cora (11) and McKenna(9) who miss Julian and Allesandra deeply and know what's happened in this heartbreaking situation is very, very wrong. Ted is a wonderful father and needs to be with his children immediately. I am hopeful that this nightmare will be rectified very soon.

Thank you for your time,

Kristen Kelpsch

From: ted.bush < ted.bush@comcast.net > Sent: Wednesday, July 29, 2020 12:48 PM

To: DRDivOrders Cal41 < DRDivOrdersCal41@cookcountycourt.com>

Cc: emammas@mammasgoldberg.com; cmvanderporten@mammasgoldberg.com; swasko@waskolaw.com

Subject: RE: FW: 2017 D 230075 IRMO Bush Substitution Petition & Exhibits

All: Please see string. I was inquiring what I believed to be ministerial/administrative in nature and not any substantive ex parte communication.

Sent from my Verizon, Samsung Galaxy smartphone

From: DRDivOrders Cal41 < <u>DRDivOrdersCal41@cookcountycourt.com</u>>

Sent: Wednesday, July 29, 2020 12:27 PM

To: ted.bush@comcast.net **Cc:** kristenkelpsch@yahoo.com

Subject: FW: 2017 D 230075 IRMO Bush Substitution Petition & Exhibits

Hi Counsel,

Please refer to the previous email from Judge Rivera. Please follow the steps indicated.

Kind Regards,

Marie Nicholas (Court Clerk)
Domestic Relations – Calendar 41
Richard J Daley Center

50 W. Washington St. Rm: 1908

From: Elizabeth Loredo-Rivera (Judiciary) Sent: Wednesday, July 29, 2020 12:10 PM

To: DRDivOrders Cal41 < <u>DRDivOrdersCal41@cookcountycourt.com</u>> **Subject:** Re: 2017 D 230075 IRMO Bush Substitution Petition & Exhibits

Marie, Edwin Bush is an attorney but he's pro se on his own case. And he wrote to you but did NOT include the other side. I don't know who he cc'd in his email to you, but that person as far as I know is NOT a party to the case. Please tell him the following:

NO MESSAGES WILL BE RESPONDED TO IF THEY DO NOT INCLUDE ALL PARTIES TO A CASE.

NO MESSAGES CAN INCLUDE NON-PARTIES.

PLEASE INCLUDE ALL PARTIES ON YOUR CASE AND PLEASE DELETE NON-PARTIES FROM YOUR EMAIL, INCLUDING ANY BCC'S THAT INCLUDE NON-PARTIES. THANK YOU

JUDGE ELIZABETH LOREDO RIVERA

Circuit Court of Cook County, Illinois Calendar 41, Courtroom 1908 Richard J. Daley Center 50 W. Washington Chicago, Illinois 60602

From: DRDivOrders Cal41 < <u>DRDivOrdersCal41@cookcountycourt.com</u>>

Sent: Wednesday, July 29, 2020 11:58 AM

To: Elizabeth Loredo-Rivera (Judiciary) < Elizabeth.Loredo-Rivera@cookcountyil.gov>

Subject: FW: 2017 D 230075 IRMO Bush Substitution Petition & Exhibits

HI Judge Rivera,

Question in prior email from Counsel Edwin F. Bush.

Marie

From: Ted Bush [mailto:ted.bush@comcast.net]
Sent: Wednesday, July 29, 2020 10:46 AM

To: DRDivOrders Cal41 < DRDivOrders Cal41@cookcountycourt.com>

Cc: kristenkelpsch@yahoo.com

Subject: FW: 2017 D 230075 IRMO Bush Substitution Petition & Exhibits

External Message Disclaimer

This message originated from an external source. Please use proper judgment and caution when opening attachments, clicking links, or responding to this email.

Dear Clerk for Judge Rivera,

I was wondering when we may expect a ruling on the Carr SOJ Petition by Judge Rivera. I do not mean to bother or to push anyone.

Regards, Edwin F. Bush Attorney at Law From: Maria Marich (Chief Judge's Office) < maria.marich@cookcountyil.gov >

Sent: Wednesday, July 29, 2020 7:04 AM **To:** Ted Bush <ted.bush@comcast.net>

Subject: Re: 2017 D 230075 IRMO Bush Substitution Petition & Exhibits

Good morning, Please send all correspondence for Judge Loredo Rivera Calendar 41 to DRDivOrdersCal41@cookcountycourt.com

Thank you,

Maria Marich

Office of the Chief Judge Court Coordinator for Judge Edward Arce 50 W. Washington Chicago, Illinois 60602 Phone (312)603-4823

E-Mail maria.marich@cookcountyil.gov

From: Ted Bush < ted.bush@comcast.net > Sent: Tuesday, July 28, 2020 3:37 PM

To: Maria Marich (Chief Judge's Office) < maria.marich@cookcountyil.gov **Subject:** RE: 2017 D 230075 IRMO Bush Substitution Petition & Exhibits

External Message Disclaimer

This message originated from an external source. Please use proper judgment and caution when opening attachments, clicking links, or responding to this email.

Maria,

I don't mean to bother anyone, but do you know when we might expect a decision on the Judge Carr SOJ Petition before Judge Rivera?

Regards, Edwin F. Bush Attorney at Law

From: Maria Marich (Chief Judge's Office) <maria.marich@cookcountyil.gov>

Sent: Wednesday, July 15, 2020 8:55 AM

To: Elizabeth Loredo-Rivera (Judiciary) < Elizabeth.Loredo-Rivera@cookcountyil.gov>

Cc: Ted Bush <ted.bush@comcast.net>; swasko@waskolaw.com; emammas@mammasgoldberg.com;

cmvanderporten@mammasgoldberg.com

Subject: Fw: 2017 D 230075 IRMO Bush Substitution Petition & Exhibits

Your email has been forwarded to Judge Loredo-Rivera

Thank you,

Maria Marich

Office of the Chief Judge Court Coordinator for Judge Edward Arce 50 W. Washington Chicago, Illinois 60602 Phone (312)603-4823

E-Mail maria.marich@cookcountyil.gov

From: Ted Bush < ted.bush@comcast.net Sent: Wednesday, July 15, 2020 8:44 AM

To: Maria Marich (Chief Judge's Office) < maria.marich@cookcountyil.gov >

Cc: swasko@waskolaw.com>; emammas@mammasgoldberg.com

<emammas@mammasgoldberg.com>; cmvanderporten@mammasgoldberg.com

<cmvanderporten@mammasgoldberg.com>

Subject: 2017 D 230075 IRMO Bush Substitution Petition & Exhibits

External Message Disclaimer

This message originated from an external source. Please use proper judgment and caution when opening attachments, clicking links, or responding to this email.

Maria,

We have a scheduled presentment at 11:00 a.m. before Judge Rivera. Attached are the file-stamped documents.

Regards, Edwin F. Bush Attorney at Law Des Plaines, IL 2024878238

From: DRDivOrders Cal41 < DRDivOrders Cal41@cookcountycourt.com>

Sent: Thursday, July 30, 2020 3:18 PM

To: cmvanderporten@mammasgoldberg.com; ted.bush@comcast.net
cc:emammas@mammasgoldberg.com; swasko@waskolaw.com

Subject: RE: IRMO BUSH 17D 230075 Decision

All Parties:

Attached you will find the Order from Judge Rivera in regards to the case above.

Kind Regards,

Marie Nicholas Calendar 41, Room 1908 Domestic Relations Division

From: Ted Bush <ted.bush@comcast.net>
Sent: Sunday, August 2, 2020 8:27 AM

To: 'Grace Dickler (Judiciary)'; 'nairee.hagopian@cookcountyil.gov'; 'Lauren Wynne (Chief Judge's Office)';

'swasko@waskolaw.com'; 'emammas@mammasgoldberg.com';

'cmvanderporten@mammasgoldberg.com'

Subject: Re-NOEM/Motion Filed For Presentment August 4, 2020 Before Presiding Judge Dickler 9:15 a.m. NOEM -- to establish a temporary parenting schedule2 Dickler.pdf; IRMO Bush teacher and social

worker combined.pdf; emergency motion to establish parenting schedule combined filed.pdf

All,

I filed the attached this morning, and certainly am willing to work with your schedules. I hope to present this August 4, 2020 before Judge Dickler, as she has jurisdiction over this case at this time.

Regards, Edwin F. Bush Attorney at Law Des Plaines, IL 202-487-8238

From: Ted Bush <ted.bush@comcast.net>
Sent: Friday, August 7, 2020 12:03 PM

To: 'Grace Dickler (Judiciary)'; 'Lauren Wynne (Chief Judge's Office)'; 'Nairee Hagopian (Chief Judge's

Office)'

Cc: 'Renfroe, Scott'

Subject: David Pasulka Denies He Is Suspended And Is Still Billing For GAL Services **Attachments:** pasulka email denying suspension.pdf; Pasulka Invoice redacted.pdf

Dear Honorable Grace Dickler and Staff,

As an officer of the court and a licensed attorney, I have a duty under Rule 8.3(b) to disclose information I have received about the David Pasulka suspension as a GAL, that he is not complying with the suspension and denying he is suspended.

I was sent a document by a party to a case before Judge Scannicchio, who witnessed David Pasulka inappropriately touch in a sexual manner who he/she believes to be one of the Jane Doe's in Judge Scannicchio's courtroom a few years ago, before she arrived to the bench that morning. He/she reported it at that moment to his/her former counsel, Mr. David Goldstein at that very moment and recorded the date and time.

On August 5th, 2020, David Pasulka denied in writing that he had been suspended as a GAL, in violation of Rule 8.4(c). See attached e-mail string, which I have redacted at their request for their protection. In addition, David Pasulka is continuing to bill clients for "services" rendered as a GAL after the effective date of his suspension – in this case on July 27, 2020.

In a billing dispute several years back, in which the party alleged Mr. Pasulka to be overbilling, Mr. Pasulka threatened the party that he would lose custody of hi/hers children if he brought the complaint to Judge Scannichhio. David Pasulka claimed that he talked to Judge Scannicchio about this, and she was "aware of the situation" and he/she would not prevail in a fee dispute.

In addition, I was told by another party before Judge Robert Johnson that David Pasulka offered to have her attorney, James Macchitelli, approved as a GAL in exchange for Mr. Macchitelli withdrawing as her counsel and forcing the woman to go to trial *pro se* in 2017. Mr. Macchitelli did not take that offer, honorably, and is still her counsel.

Regards, Edwin F. Bush Attorney at Law Des Plaines, IL 202-487-8238

```
----Original Message-----
From: REDACTED < REDACTED>
Sent: Wednesday, August 5, 2020 5:30 PM
To: David Pasulka < David Pasulka@pasulkalaw.com >
Subject: Re: Pasulka & Associates Invoice
I did not wanted to say in group so sending you this in response to your statement of "wrongfully
accused" Once in the court room while we were waiting for the judge, I personally witness your action
with your assistant. I documented the date and time and informed my attorney. So please do question
my integrity again.
Regards,
REDACTED
> On Aug 5, 2020, at 3:26 PM, David Pasulka < DavidPasulka@pasulkalaw.com > wrote:
> No I am not. Please read my email below.
> -----Original Message-----
> From: REDACTED < REDACTED>
> Sent: Wednesday, August 05, 2020 2:38 PM
> To: David Pasulka < DavidPasulka@pasulkalaw.com>; REDACTED
> < REDACTED>
> Cc: REDACTED
> Subject: RE: Pasulka & Associates Invoice
> David,
> Are you telling me that you are still my Boys GAL? Below is the public notice from Judge Grace G.
Dickler in case you missed it.
> Due to the serious allegations contained in the ARDC complaint filed against David Pasulka on July 13,
2020, I am suspending Mr. Pasulkas' inclusion on the Child Representative and Court Approved
Mediators lists. I am further suspending his participation in any other Court Committee to which he has
been appointed in the Domestic Relations Division of the Circuit Court of Cook County.
> Sincerely
> Grace G. Dickler
> Your fees were adjusted but you still have the ownership to provide the explanation on the items on
your billings and amount of time it took to do
> your tasks as stated.
> Finally, on question of integrity, only time will tell but in the meantime STOP the overbillings please
and do not ever come near my children again.
> REDACTED
```

> -----Original Message-----

> From: David Pasulka < David Pasulka@pasulkalaw.com>

> Sent: Wednesday, August 5, 2020 2:10 PM

```
> To: REDACTED; REDACTED; REDACTED
> Cc: REDACTED; REDACTED
> Subject: RE: Pasulka & Associates Invoice
> Just in case you forgot, on April 28, 2020, my fees were adjudicated by judge ScannicchiO as was my
rate. This was effective through March 31, 2020.
> I have not been suspended, only wrongfully accused. You trying to take advantage of the situation is
disingenuous at best.
> -----Original Message-----
> From: REDACTED < REDACTED>
> Sent: Wednesday, August 05, 2020 9:32 AM
> To: REDACTED < REDACTED; REDACTED
> Cc: REDACTED; REDACTED; David Pasulka
> < <u>DavidPasulka@pasulkalaw.com</u>>
> Subject: RE: Pasulka & Associates Invoice
> Lisa
> I will review all the bills again and comeback with questions and concerns and will require very details
explanation as I am going back to inception again in light of new developments.
> Mr. Pasulka has been suspended effective July 21 (when he was informed) and he should not be
working on anything relating my sons or the case. He is also not allowed to have any communication
with my sons or relating to this matter. I take personal offense to the attached invoice that he is still
working on our case beyond his suspension date.
>
> Stay tuned.
> REDACTED
> ----Original Message-----
> From: Lisa Rusnak < Lisa Rusnak @pasulkalaw.com >
> Sent: Wednesday, August 5, 2020 9:21 AM
> To: REDACTED
> Cc: REDACTED; REDACTED;
> REDACTED
> Subject: Pasulka & Associates Invoice
> For your convenience, your bill is attached to this message.
> Please review the attached bill and submit your payment.
> Thank you.
> Note: The attached bill is in PDF file format. Adobe Acrobat Reader is
> necessary to view this file. If you do not have Adobe Acrobat Reader
> installed, please download the free reader from the Adobe website
```

Pasulka & Associates, PC 70 West Madison Street Suite 2222 Chicago, IL 60602 (312)236-9150

REDACTED Children Mom: REDACTED Dad: REDACTED

August 05, 2020

In Reference To: Reappointed Guardian Ad Litem on REDACTED

File # REDACTED-DPP GAL

Professional Services

		Hrs/Rate	Amount
7/9/2020 DPP	REDACTED	0.20 425.00/hr	85.00
VM	REDACTED	0.20 250.00/hr	NO CHARGE
DPP	REDACTED	0.50 425.00/hr	212.50
VM	REDACTED	0.50 250.00/hr	NO CHARGE
DPP	REDACTED	0.30 425.00/hr	127.50
VM	REDACTED	0.30 250.00/hr	NO CHARGE
DPP	REDACTED	0.20 425.00/hr	85.00

REDACTED Children Page 2

			Hrs/Rate	Amount
7/9/2020	VM	REDACTED	0.20 250.00/hr	NO CHARGE
7/10/2020	DPP	REDACTED	0.50 425.00/hr	212.50
	VM	REDACTED	0.10 250.00/hr	NO CHARGE
	DPP	REDACTED	0.10 425.00/hr	42.50
7/19/2020	DPP	REDACTED	0.50 425.00/hr	212.50
	DPP	REDACTED	0.25 425.00/hr	106.25
	DPP	REDACTED	0.50 425.00/hr	212.50
7/20/2020	DPP	REDACTED	0.20 425.00/hr	85.00
	VM	REDACTED	0.20 250.00/hr	NO CHARGE
7/21/2020	DPP	REDACTED	0.20 425.00/hr	85.00
7/27/2020	DPP	Receive and review email correspondence between REDACTED and REDACTED regarding disagreement on the agreed order. I reviewed the order	0.20 425.00/hr	85.00
	For pr	rofessional services rendered	5.15	\$1,551.25
	Previo	ous balance		\$12,528.62
7/27/2020	Payme	ent - from REDACTED		(\$1,286.55)
	Total	payments and adjustments		(\$1,286.55)
	Balan	ce due		\$12,793.32

WE ACCEPT ALL MAJOR CREDIT CARDS

(TOTAL "NO CHARGE" 0.01 hrs. = \$375.00)

REDACTED Children Page 3

From: Ted Bush <ted.bush@comcast.net>
Sent: Tuesday, August 11, 2020 12:52 PM

To: 'Grace Dickler (Judiciary)'; 'Nairee Hagopian (Chief Judge's Office)'; 'Lauren Wynne (Chief Judge's

Office)'

Cc: 'Steve Wasko'; 'Evan Mammas'; 'Caidi Vanderporten'; 'Kristen'
Subject: IRMO Bush - File-Stamped NOEM, Request for Investigation

Attachments: NOEM -- to establish a temporary parenting schedule5 Dickler filed.pdf

Dear Judge Dickler and staff,

Attached is a file-stamped NOEM for an emergency motion for hearing, and a non-emergency motion to be presented to you tomorrow morning. I request dial-in information, a reassignment order or a recusal order.

In addition, I am requesting an investigation from your office into allegations of the e-mail from Caidi Vanderporten, dated December 4, 2019. On March 23, 2018, Lake Toback DiDomenico was heard on their motion for reconsideration to withdraw as my counsel. They wanted a trial retainer and Judge Bernstein refused to allow them to withdraw, and their motion for reconsideration was heard before Judge Debra Walker. Judge Walker read the transcript of Judge Bernstein from their first hearing on their motion to withdraw earlier that month, and she raised the issue of Judge Bernstein being disqualified due to the comments she made. Judge Walker told me, as a litigant about to be prose, that I had the ability to file an SOJ for cause.

If opposing counsel is claiming that I was retaliated against for filing a petition another judge in this division suggested I file, that is outrageous. Everyone knows there is a culture of retaliation that you have allowed to develop in this division, and these counsel seem aware of information that was certainly not available to me. They were not even in this case at the time. Michael DiDomenico and Gia Conti, then of Lake Toback, told me explicitly judges retaliate for filing SOJ's, and given Judge Carr's record, it sure looks like it.

Judge Bernstein recused herself on March 26, 2018, the morning the SOJ petition was presented. She refused to ever hold a hearing she was required to under 750 ILCS 5/602.10(b), entered sua sponte orders in violation of Suriano v. Lafeber (2008, in which she was the trial judge in that case as well), made prejudicial comments, earned her well-deserved reputation of being bipolar, and made my children cry repeatedly.

Regards, Edwin F. Bush Attorney at Law Des Plaines, IL 202-487-8238

From: Caidi Vanderporten <cmvanderporten@mammasgoldberg.com>

Sent: Wednesday, December 4, 2019 12:04 PM

To: 'Ted Bush' <ted.bush@comcast.net>; Evan Mammas <emammas@mammasgoldberg.com>

Subject: RE: Bush

Give me a break. I actually cannot roll my eyes hard enough at how sad this email is. You rip off your own children.. since March 2018 to be exact.

From: Ted Bush [mailto:ted.bush@comcast.net]
Sent: Wednesday, December 04, 2019 11:59 AM
To: Caidi Vanderporten; Evan Mammas; 'Steve Wasko'

Subject: RE: Bush

Caidi,

I met with Mike Pence in Wisconsin on the 24th of October. I went to the White House to meet with the National Economic counsel and director of OPL on November 4th. Just to clarify your misunderstanding. I also went to the White House in March and July, met with the USTR, Secretary of Commerce and several Congressmen and Senators. I have a real job, I already told you where I work and you took notes. I don't rip off children and break the law for a living, like you.

Regards, Ted

From: Caidi Vanderporten < cmvanderporten@mammasgoldberg.com>

Sent: Wednesday, December 4, 2019 11:14 AM

To: 'ted.bush' <ted.bush@comcast.net>; Evan Mammas <emammas@mammasgoldberg.com>; 'Steve Wasko'

<swasko@waskolaw.com>

Cc: 'Erika Bush' < erika25bush@gmail.com>

Subject: RE: Bush

How do you even find the time for all these appeals, what with your fancy job flying back and forth to the white house to meet with Mike Pence?

Order is attached.

From: ted.bush [mailto:ted.bush@comcast.net]
Sent: Wednesday, December 04, 2019 8:29 AM

To: Evan Mammas; 'Steve Wasko'

Cc: Caidi Vanderporten **Subject:** RE: Bush

Well...well...there is a motion for reconsideration you were served with and odyssey says you opened on November 27, 2019 at 2:41 p.m. Your reply, if you choose to follow their local rules, is due tomorrow. Have fun with that one Evan. As Judge Carr would say, you may need to spend some time at the law library.

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: Evan Mammas < emammas@mammasgoldberg.com>

Date: 12/4/19 8:09 AM (GMT-06:00)

To: "'ted.bush'" <ted.bush@comcast.net>, 'Steve Wasko' <swasko@waskolaw.com>

Cc: Caidi Vanderporten < cmvanderporten @mammasgoldberg.com >

Subject: RE: Bush

Well . . . well . . . your motion to stay was denied . .

Evan James Mammas, Esq.

Mammas | Goldberg

Attorneys at Law

211 West Wacker Drive

Suite 1100

Chicago, Illinois 60606

Phone: (312) 630-1111

E-mail address:

emammas@mammasgoldberg.com

Service of Notice:

notice@mammasgoldberg.com

Website:

http://www.mammasgoldberg.com

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Please consider the environment before printing this email.

From: ted.bush <ted.bush@comcast.net>

Sent: Wednesday, December 4, 2019 8:03 AM

To: Evan Mammas <emammas@mammasgoldberg.com>; 'Steve Wasko' <swasko@waskolaw.com>

Cc: Caidi Vanderporten < cmvanderporten@mammasgoldberg.com>

Subject: RE: Bush

Erika Bush is not in compliance of Dr. Dachman's protocol. Besides refusing to schedule lesser than every three weeks, your client brought in a notebook to the November 22, 2019 meeting and wrote down every one of his questions, against his express wishes. She refused to release confidentiality and made false paranoid allegations against Dr. Dachman himself, causing Dr. Dachman to cancel the meeting after 10 minutes.

I will not be at court and I will file a motion to strike this motion if you do not voluntarily withdraw it, which I
believe you have a duty to do. If you want to continue to the 20th that is fine. The circuit court lacks
jurisdiction as the matter is currently being litigated in the appellate court. In addition, the court failed to make
a finding of ability to pay and stated in open court you did not meet your burden of production. (You'll see in
the next appeal).

Regards
Ted
Sent from my Verizon, Samsung Galaxy smartphone
Original message
From: Evan Mammas < emammas@mammasgoldberg.com >
Date: 12/4/19 7:21 AM (GMT-06:00)
To: 'Steve Wasko' < <u>swasko@waskolaw.com</u> >, Ted Bush < <u>ted.bush@comcast.net</u> >
Cc: Caidi Vanderporten < cmvanderporten@mammasgoldberg.com >
Subject: RE: Bush
GOOD LUCK TO YOU STEVE
There are no child related matters (except for rule on support) which is noticed for today

I trust that Ted will request time to respond and the matter will be put over to December 20^{th} at 2:00 p.m. as that is the date already on Judge Carr's docket

Again . . god luck today

Evan James Mammas, Esq.

Mammas | Goldberg

Attorneys at Law

211 West Wacker Drive

Suite 1100

Chicago, Illinois 60606

Phone: (312) 630-1111

E-mail address:

emammas@mammasgoldberg.com

Service of Notice:

notice@mammasgoldberg.com

Website:

http://www.mammasgoldberg.com

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Please consider the environment before printing this email.

From: Steve Wasko <swasko@waskolaw.com> Sent: Wednesday, December 4, 2019 7:16 AM

To: Evan Mammas <emammas@mammasgoldberg.com>; Ted Bush <ted.bush@comcast.net>

Subject:

Counsel. I will not be present this morning as I have a surgical procedure.

Please ensure that the parties and children comply with any and all of the protocol requirements of Dr. Dachman so that parenting issues can move forward.

Thank you.

From: Ted Bush <ted.bush@comcast.net>
Sent: Friday, August 14, 2020 10:56 AM

To: 'Evan Mammas'; 'Grace Dickler (Judiciary)'; 'Nairee Hagopian (Chief Judge's Office)'; 'Lauren Wynne

(Chief Judge's Office)'; 'Steve Wasko'; 'Caidi Vanderporten'

Subject: IRMO Bush 2017 D2 30075 NOEM/NOM August 18, 2020 at 9:15 a.m.

Attachments: NOEM -- to establish a temporary parenting schedule6 Dickler combined.pdf; IRMO Bush teacher

and social worker combined filed.pdf; emergency motion to establish parenting schedule combined

filed.pdf

Please see attached NOEM which I just filed, which is being presented for the 6th time. If there is not action taken, I will file for a Rule 381/383 order or writ early next week. I have also attached as an exhibit the communication by Dr. John Palen calling the court and its officers instruments in child abuse.

Regards, Edwin F. Bush Attorney at Law Des Plaines, IL 202-487-8238

From: Ted Bush <ted.bush@comcast.net>
Sent: Monday, August 24, 2020 9:58 AM

To: grace.dickler@cookcountyil.gov; nairee.hagopian@cookcountyil.gov;

lauren.wynne@cookcountyil.gov

Cc: Steve Wasko; cmvanderporten@mammasgoldberg.com; kristenkelpsch@yahoo.com;

emammas@mammasgoldberg.com

Subject: Notification of Service -- Bush v. Dickler Supreme Court Emergency Motion For Supervisory Order

(No. 126305)

Attachments: Bush v. Dickler motion for supervisory order dickler combined filed.pdf

Nairee & Lauren,

Please indicate receipt of the filed Emergency Motion for Supervisory Order, Bush v. Dickler (No. 126305) by kindly replying to me. The Supreme Court clerk accepted it today.

Regards, Edwin F. Bush Attorney at Law Des Plaines, IL 202-487-8238

From: Ted Bush <ted.bush@comcast.net>
Sent: Tuesday, August 25, 2020 8:15 AM

To: 'grace.dickler@cookcountyil.gov'; 'nairee.hagopian@cookcountyil.gov';

'lauren.wynne@cookcountyil.gov'

Cc: 'Steve Wasko'; 'cmvanderporten@mammasgoldberg.com'; 'kristenkelpsch@yahoo.com';

'emammas@mammasgoldberg.com'

Subject: RE: Notification of Service -- Bush v. Dickler Supreme Court Emergency Motion For Supervisory

Order (No. 126305)

Nairee and/or Lauren,

I have not received confirmation of receipt of the Emergency Motion for Supervisory Order filed with the Illinois Supreme Court (No. 126305), Bush v. Dickler. Since your offices are closed, I cannot serve a paper copy on you. Could you please confirm receipt of service?

Also, I wanted to advise you about the 4th story by CBS 2 on David Pasulka, which ran on August 18th. https://chicago.cbslocal.com/2020/08/18/only-on-2-audio-and-video-document-drunken-driving-arrest-of-attorney-david-pasulka-who-also-faces-sexual-assault-claims/?fbclid=IwAR0qap0liH4q2moRM9W52fRYj-mhai7EfpSRBNNqhn-TQ9fGVwArnKJ7Sz0

Yesterday, Illinois Fathers For Equality (ILFFE) issued the attached press release indicating their concerns about the GAL/CR program, relating to a non-emergency motion I would also like to present before Judge Dickler. ILFFE President Chad Loudermilk's contact is loudermilkc84@gmail.com and I believe his phone is 618-707-5424 in case you wish to contact ILFFE about their experiences with the GAL/CR program.

https://www.facebook.com/ILFathersforEquality/

*** FOR IMMEDIATE RELEASE ***

With the recent news regarding Cook County Guardian Ad Litem/Child Representative (GAL/CR) Selection Committee Chairman, attorney David Pasulka's alleged behavior of sexual assaults, offering of favorable custody recommendations in exchange for sexual favors, and his multiple DUIs., it is with no surprise to anyone involved in Illinois family court reform, these behaviors and bribes have been occurring for years.

ILFFE has heard these stories numerous times over the years and have watched many try to expose these issues only to be ignored and dismissed, if not outright retaliated against.

The Attorney Registration and Disciplinary Committee's (ARDC) complaint of Chairman Pasulka highlights systemic problems within the family court arena – all driven by greed and power.

Unfortunately, In our experience, Chairman Pasulka's behavior is not unusual, nor is it unusual for many other members on the list of approved GALs/CRs.

Furthermore, we are well aware that these problems have been well-known within the legal community for many years but ignored or covered-up by those in power.

It is obvious there is no practical solution to changing this festering culture of criminal behavior, cronyism, patronage, and cover-up, other than to start with a clean slate.

It is with this that we DEMAND:

- -David Pasulka be Permanently suspended of all committees he chairs or currently sits on.
- Criminal and legislative investigations of all GAL/CR programs;
- -Dissolution of the GAL/CR Selection Committee;
- -Purge of the list of approved GALs/CRs and all currently approved GALs/CRs must reapply;
- -Oversight Committee for any future GAL/CR program;

-Review of all cases involving David Pasulka

We note that nearly all affected by the above demands have actively opposed and sabotaged family law reforms which would have removed the adversarial nature of divorce and the subsequent harm to children of divorce and divorcing parents. But instead, these people were advocating for a position that enriched them financially, and for Mr. Pasulka sexually.

Regards, Edwin F. Bush Attorney at Law Des Plaines, IL 202-487-8238

From: Ted Bush <ted.bush@comcast.net> Sent: Monday, August 24, 2020 9:58 AM

To: grace.dickler@cookcountyil.gov; nairee.hagopian@cookcountyil.gov; lauren.wynne@cookcountyil.gov

Cc: Steve Wasko <swasko@waskolaw.com>; cmvanderporten@mammasgoldberg.com; kristenkelpsch@yahoo.com; emammas@mammasgoldberg.com

Subject: Notification of Service -- Bush v. Dickler Supreme Court Emergency Motion For Supervisory Order (No. 126305)

Nairee & Lauren,

Please indicate receipt of the filed Emergency Motion for Supervisory Order, Bush v. Dickler (No. 126305) by kindly replying to me. The Supreme Court clerk accepted it today.

Regards, Edwin F. Bush Attorney at Law Des Plaines, IL 202-487-8238

From: ted.bush@comcast.net

Sent: Sunday, November 15, 2020 9:35 AM

To: 'terry.bright@cookcountyil.gov'; 'grace.dickler@cookcountyil.gov';

'Lauren.Wynne@cookcountyil.gov'; 'nairee.hagopian@cookcountyil.gov'; 'jcarr@johntcarr.com';

'cgriffis@atg.state.il.us'

Cc: 'cmvanderporten@mammasgoldberg.com'; 'emammas@mammasgoldberg.com';

'swasko@waskolaw.com'; 'erika25bush@gmail.com'

Subject: Caidi Vanderporten's 10/16/20 Robing Room Review of Judge Carr/Notification of Service

Attachments: 2 A.B. v. Carr complaint.pdf; 5 A.B. v. Carr Notice of Emergency Motion filed.pdf; 3 A.B. v. Carr motion

for preliminary injunction filed.pdf; 4 A.B. v. Carr memorandum in support of preliminary injunction filed.pdf; 4 A.B. v. Carr memorandum in support of preliminary injunction filed Ex G.pdf; 4 A.B. v. Carr memorandum in support of preliminary injunction filed Ex F.pdf; 4 A.B. v. Carr memorandum in support of preliminary injunction filed Ex D.pdf; 4 A.B. v. Carr memorandum in support of preliminary injunction filed Ex C.pdf; 4 A.B. v. Carr memorandum in support of preliminary injunction filed Ex C.pdf; 4 A.B. v. Carr memorandum in support of preliminary injunction filed Ex B.pdf; 4 A.B. v. Carr

memorandum in support of preliminary injunction filed Ex A.pdf

Caidi,

I was interested to see your review of Judge Carr on October 16, 2020 – three days after he *sua sponte* vacated the October 8, 2020 scheduling order in its entirety, hauling everyone into court on October 13, 2020 – and cancelling your scheduled motions. I had no problem with him vacating the October 8, 2020 order. Considering we finally agree on something, how about we get a transfer order.

Alternatively, we can wait until Friday when we appear before Judge Gary Feinerman of the Northern District of Illinois at 9:15 a.m. Judge Feinerman already screened my motion as an emergency, and promptly gave us the 11/20/20 date. I guess getting your motions heard depends on whether you are in federal or state court.

Regards, Edwin F. Bush Attorney at Law Des Plaines, IL 202-487-8238

Civil Litigation - Private

Comment #: IL3761

Rating:2.4 ☆☆☆☆☆☆☆☆☆☆

Comments:

Judge Carr is wildly erratic and frequently overturns his own orders. He has zero patience and refuses to hear motions or pleadings in a timely manner. If you have him I would file a substitution as quickly as possible.

View Detail Send e-mail to this poster 10/16/2020 5:02:21 PM

http://www.therobingroom.com/illinois/Judge.aspx?ID=4653#89935

http://www.therobingroom.com/illinois/JudgeDetail.aspx?id=4653&ratingid=89935

Hon. John Thomas Carr

Associate Judge Circuit Court Cook County Cook Judicial Circuit

RATE A JUDGE

Attorney Average Rating: 2.1 - 9 rating(s) Non-Attorney Average Rating: 1.0 - 12 rating(s)

General Rating Criteria

General	rung criteria
* Temp.	Temperament (1=Awful,10=Excellent)
* Sch.	Scholarship (1=Awful,10=Excellent)
* Indu.	Industriousness (1=Not at all industrious,10=Highly industrious)
* Comp.	Ability to Handle Complex Litigation (1=Awful,10=Excellent)
* Punct.	Punctuality (1=Chronically Late,10=Always on Time)
* Ab-Pr.	General Ability to Handle Pre-Trial Matters (1=Not all Able, 10=Extremely Able)
* Ab-Tr.	General Ability as a Trial Judge (1=Not all Able, 10=Extremely Able)
Flex	Flexibility In Scheduling (1=Completely Inflexible,10=Very Flexible)

Criminal Case Rating Criteria (if applicable)

	0 \ 11 /						
* Ev-Cr.	Evenhandedness in Criminal Litigation (1=Demonstrates Bias,10=Entirely Evenhanded)						
Bail	General Inclination Regarding Bail (1=Pro-Defense,10=Pro-Government)						
Plea	Involvement in Plea Discussions (1=Not at all Involved, 10=Very Involved)						
IncPr.	General Inclination in Criminal Cases Pretrial Stage (1=Proprosecution,10=Pro-defense)						
IncTr.	General Inclination in Criminal Cases Trial Stage (1=Proprosecution,10=Pro-defense)						
IncS.	General Inclination in Criminal Cases Sentencing Stage (1=Proposecution,10=Pro-defense)						

Civil Case Rating Criteria (if applicable)

* Ev-Cv.	Evenhandedness in Civil Litigation (1=Not at all Evenhanded,10=Entirely Evenhanded)
Settle	Involvement in Settlement Discussions (1=Not at all Involved,10=Very Involved)
Inc.	General Inclination (1=Pro-defendant, 10=Pro-plaintiff)

General Rating Criteria

Evaluator	ID	Date	*Temp.	*Sch.	*Indu.	*Comp.	*Punct.	*Ab- Pr.	*Ab- Tr.	Flex
Civil Litigation - Private	89935	10/16/2020	1	3	1	1	10	1	1	1
Criminal Defense Lawyer	89495	09/24/2020	3		1	1	3	1	1	1
Criminal Defense Lawyer	88285	07/29/2020	1	1	1	1	1	1	1	1
Civil Litigation - Private	72682	07/17/2019	1	1	1	1		1	1	1
Criminal Defense Lawyer	71827	07/02/2019	1							
Civil Litigation - Private	68639	05/03/2019	1	1	1	1	1	1	1	1
Civil Litigation - Private	57079	06/19/2018	1	1	1	1	1	1	1	1
Civil Litigation - Private	23715	10/15/2013	1	1	1	1	2	1	1	1
Criminal Defense Lawyer	3592	12/04/2008	8	8	7	8	10	10	8	10
Category Average			2.0	2.3	1.8	1.9	4.0	2.1	1.9	2.1

Criminal Case Rating Criteria Civil Case Rating Criteria

	e)	cabl	applio	(if		(if applicable)						
Commen	Average	Inc.	Settle	*Ev- Cv.	ID	Inc S.	Inc Tr.	Inc Pr.	Plea	Bail	*Ev- Cr.	ID
Read Commer	2.4	5	2	1	89935							89935
Read Commer	1.7				89495							89495
	1.0	1	1	1	88285	1	1	1	1	1	1	88285
Read Commer	1.0	1		1	72682							72682
Read Commer	1.0			1	71827							71827
Read Commer	1.0		1	1	68639	1	1	1	1	1	1	68639
Read Commer	1.0				57079							57079
Read Commer	1.1	1	1	1	23715							23715
Read Commer	8.4				3592							3592
	2.1	2.0	1.3	1.0		1.0	1.0	1.0	1.0	1.0	1.0	

From: ted.bush@comcast.net

Sent: Monday, February 8, 2021 4:24 PM **To:** 'grace.dickler@cookcountyil.gov'

Cc: 'Lauren Wynne (Chief Judge's Office)'; 'Erika Bush'; 'Terry Bright';

'timothy.murphy@cookcountyil.gov'; 'nairee.hagopian@cookcountyil.gov'; 'cgriffis@atg.state.il.us';

'Dworkin, Hal'; 'Steve Wasko'

Subject: IRMO Bush, 2017 D 230075, Judge John T. Carr On Video Violating Appellate Court Order

Attachments: Carr and 7th Circuit Edited.mp4

Dear Judge Dickler,

Attached is a video of one of your Associate Judges, John T. Carr, openly violating an order of the Illinois Appellate Court, *In re Marriage of Bush*, 1-19-1467, in which he was ordered on December 13, 2019 to have a hearing on parenting time. The appellate court vacated the parenting time portion of the February 13, 2019 judgment, and remanded for final hearing.

Judge Carr has been in open defiance of this Order for over a year, and it is well documented in the common law record of this case. On December 20, 2019, Judge Carr claimed on the record he believed what he did was right, and still believes it – despite being remanded a week before. His ongoing actions only confirm the evidence of his intent – going back to 2019.

In this video, Judge Carr is contradicted the next day before the Assistant Illinois Attorney General before the Seventh Circuit Court of Appeals during oral argument in J.B. et al. v. Woodard et al. The full oral argument is available on the 7th Circuit's website. http://media.ca7.uscourts.gov/sound/2020/ds.20-1212.20-1212 12 16 2020.mp3. (If you listen to the whole argument, you will note the State conceded the application of the Younger abstention doctrine to private domestic relations civil cases in a question by Judges Diane Wood and Amy St. Eve (meaning I am going to win this case in the 7th Circuit, and it could redefine the nature of these proceedings from a federal jurisdictional perspective)).

I have repeatedly brought this to your attention in August 2020 when I sought to have Judge Carr substituted for cause.

Judge Carr is totally unaccountable and is out of control, routinely violating the procedural and substantive rights of parties on his calendar. This past week, a female reached out to me and provided me video of Judge Carr entering a *sua sponte* order in her case, after violating her procedural and substantive rights for five years. It is hard to imagine a more clear example than violating an order of the Illinois Appellate Court – and being caught by a very high federal court and the Illinois Attorney General's Office.

I implore you to use your supervisory powers and have Judge Carr reassigned, or to immediately schedule a hearing on his reassignment. I am working on another case right now, in which an attorney sought relief from you in 2011 and nothing occurred. The results were catastrophic. Myself and my children should not have to wait a minute longer. Parties should not have to seek supervisory orders from the Illinois Supreme Court or writs of mandamus from federal court in order to have their rights protected from your judges.

I am copying Judge Timothy Murphy, who found procedural error by Judge Carr in a June 5, 2019 written opinion and order in this case. Judge Murphy indicated in his opinion that my relief was properly suited to the appellate court, in which I prevailed. Judge Murphy is about the only serious jurist in your division, who actually cares about due process and constitutional rights of parents. Now that I prevailed in the appellate court and Judge Carr is denying the relief I am entitled to, it is time for Judge Carr to go – preferably removed from the bench entirely. Someone must do something immediately.

Regards, Edwin F. Bush Attorney at Law 202-487-8238

From: ted.bush@comcast.net

Sent: Thursday, July 8, 2021 10:33 AM

To: 'Kimberly Wilson (Chief Judge's Office)'; 'Olga Mazzone'; 'Mary T. Doheny'; 'Grace Dickler (Judiciary)';

'Lauren Wynne (Chief Judge's Office)'; 'UNICO CHICAGO'

Subject: RE: Emergency Motion

I have been following the various communications, many of which I have been copied on.

I do not believe that complaining to the Chief Judge's Office about the fitness of a GAL/CR to sit on the Selection and Training Committee, or to be a court-approved GAL is ex parte communication. They are not a party to the underlying domestic relations case, and their rights as a parent are not being adjudicated by the judge. Nor do I believe that inquiring about the procedures (or lack thereof) to complain about the ethics/competency/performance of a GAL/CR is ex parte communication. Under Rule 906, the Chief Judges administer the GAL/CR competency and qualifications. As far as we can tell, David Pasulka was removed by Judge Dickler after the ARDC investigation and media reports surfaced. By all available information, there is not a formal process, but rather an ad hoc procedure in place in which the Presiding Judge makes decisions about the fitness of a GAL/CR to sit on the committee, or to be on the approved list.

Therefore, I believe it is in my client's rights to communicate to Judge Dickler about the fitness/qualifications of Mary Doheny. That her motion has not yet been entered under AO 13 (we have not received any orders at all) further legitimizes her efforts to make concerns directly to Judge Dickler.

I believe that requesting the Presiding Judge to issue a custody order is ex parte communication. I believe that complaining to the presiding judge that one's procedural and substantive civil rights are being violated by the court and the officers of the court is not ex parte communication, that involves violations of federal law and the supervisory authority of the presiding judge.

Regards, Edwin F. Bush Attorney at Law Des Plaines, IL 202-487-8238

From: Kimberly Wilson (Chief Judge's Office) <Kimberly.Wilson1@cookcountyil.gov>

Sent: Thursday, July 8, 2021 10:05 AM

To: Olga Mazzone <olenkamazzone1@gmail.com>; Mary T. Doheny <mtdoheny@mtdfamilylaw.com>; ted.bush

<ted.bush@comcast.net>; Grace Dickler (Judiciary) <grace.dickler@cookcountyil.gov>

Subject: Re: Emergency Motion

Ms. Mazzone you need to speak with his attorney

From: Olga Mazzone < olenkamazzone1@gmail.com >

Sent: Wednesday, July 7, 2021 5:56 PM

To: Mary T. Doheny <<u>mtdoheny@mtdfamilylaw.com</u>>; ted.bush <<u>ted.bush@comcast.net</u>>; Grace Dickler (Judiciary) <<u>grace.dickler@cookcountyil.gov</u>>; Kimberly Wilson (Chief Judge's Office) <<u>Kimberly.Wilson1@cookcountyil.gov</u>>

Subject: Fwd: Emergency Motion

External Message Disclaimer

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Grace, I need to see my kids. You are a chief judge and if you know the situation and can not control what's going in on court,

Reply to me what should I do?

If you don't you participate in abuse of power, fraud and extortion.

I am expecting a reply and a SOLUTION, NOT YOUR CLERK KICKING ME OUT.

-------Forwarded message -------From: <<u>ted.bush@comcast.net</u>>
Date: Tue, Jul 6, 2021, 12:13
Subject: RE: Emergency Motion

To: Mary T. Doheny < mtdoheny@mtdfamilylaw.com>

Cc: Anthony Mazzone < unicochicago@hotmail.com >, Olga Mazzone < olenkamazzone1@gmail.com >, Jesse Blanco

<jesse4846@yahoo.com>

This is our view Mary. From October 30, 2014 until July 22, 2020 – for almost six years, there was an order of protection in effect, with the children (fraudulently) listed as protected parties, without a set visitation schedule required by 750 ILCS 60/214(b)(7). The record in this case is clear that visitation never occurred because Anthony would refuse to set times for visitation, and neither did you. Furthermore, you took no action to ensure that the law of the State of Illinois was followed (214(b)(7), and the visitation orders entered by the court were obeyed. This resulted in supervisors quitting and my client not seeing her children for months at a time.

On July 23, 2020, the order of protection expired. In order of there to be a restriction, there has to be a motion filed, a hearing, and a finding under 750 ILCS 5/603.10. There is neither of the three in effect. Accordingly, you have participated in violating the law even more severely than what occurred from October 30, 2014 until July 22, 2020.

We do not consent to a restriction. The order appointing Jesse Blanco was an agreement that he would supervise, not that my client agreed to a restriction. She filed a motion back in February 2019 for unrestricted visitation that was never heard. You then drafted an order on February 21, 2019 that my client's motion for unsupervised visitation would not be even heard until she paid you \$2000.

We want a set visitation schedule that includes overnights immediately. We do not want or need a supervisor. As Jesse indicated, the supervised sessions were fine, as were the multiple previous sessions with other supervisors. We believe the children have been concealed from my client, continue to be so, and that constitutes harassment under 750 ILCS 60/103(7).

What you two have perpetrated against my client is a crime of honest services fraud. You have intentionally prolonged this case with no legal basis.

I filed a motion into federal court this morning involving the systemic racketeering that people like you and others have perpetrated for years. I even cited another case in which you were involved in. We do not consent to supervised visitation, and we have more motions/petitions ready to be filed. I think you know where this case is going (see Dirksen federal office building). What you are suggesting is not merely enough, and you know it.

Regards,

Ted

From: Mary T. Doheny < mtdoheny@mtdfamilylaw.com>

Sent: Tuesday, July 6, 2021 11:32 AM
To: ted.bush < ted.bush@comcast.net>

Cc: Anthony Mazzone <unicochicago@hotmail.com>; Olga Mazzone <olenkamazzone1@gmail.com>; Jesse Blanco

<jesse4846@yahoo.com>
Subject: Re: Emergency Motion

Dear Ted:

Thank you.

I was in conversation with Anthony and he suggested a possible tentative parenting time for next Wednesday, July 14 at 4:00 p.m..

I know Olga has been ill, but she has been emailing me repeatedly that she wants parenting time.

Will you let me know if that time works for her? Will Olga be able to have parenting time in her home?

And Jesse, will you let me know if you are available?

Last, I will check for the November order, but do not think I have a copy.

Best	regards,
------	----------

Mary Therese Doheny

Attorney at Law

Law Offices of Wessel & Doheny

1100 Lake Street

Suite 280 A

Oak Park, Illinois 60301

312.558.3000

Fax 312.558.1303

mtdoheny@mtdfamilylaw.com

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On Tue, Jul 6, 2021 at 11:14 AM < ted.bush@comcast.net> wrote:

Great questions Mary.

- 1. Nope, there was none
- 2. Nope
- 3. Allegedly according to Kimberly Wilson's e-mail
- 4. Allegedly according to Kimberly Wilson's and your e-mail

In tribute to the late Donald Rumsfeld, I will ask myself a question: Did I receive this order, or the prior order entered in April?

Nope.

Regards, Ted

From: Mary T. Doheny < mtdoheny@mtdfamilylaw.com>

Sent: Tuesday, July 6, 2021 11:06 AM

To: ted.bush < ted.bush@comcast.net >; Anthony Mazzone < unicochicago@hotmail.com >

Subject: RE: Emergency Motion

Dear Ted:

Did you appear on your latest emergency motion last week?

Did you appear in front of Judge Cocoza?

Did she rule?

Is there an order?

Thank you in advance for your replies.

Best regards,

Mary Therese Doheny Attorney at Law Law Offices of Wessel & Doheny 1100 Lake Street Suite 280 A Oak Park, Illinois 60301

312.558.3000 Fax 312.558.1303

mtdoheny@mtdfamilylaw.com

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From: ted.bush@comcast.net

Sent: Thursday, July 15, 2021 11:19 PM

To: 'Grace Dickler (Judiciary)'; 'Mary T. Doheny'

Cc: 'Terry Bright (Chief Judge's Office)'; 'Kimberly Wilson (Chief Judge's Office)'; 'Anthony Mazzone';

'Olga Mazzone'; 'Lauren Wynne (Chief Judge's Office)'

Subject: RE: IRMO Mazzone 2011 D 007189, 007317 Emergency Motion Filed

For clarification, is the Presiding Judge transferring this case to her calendar, or is she standing in for Judge Carr? Do you want me to draft a transfer order?

We do not consent to having a hearing date 40 days from now being converted to a status date. Mary Doheny did not even give me the courtesy of sending me that proposed order before she blasted it to two coordinators. We filed an emergency motion on March 10, 2021, and there has never been a finding of whether that motion is an emergency.

I am never agreeing to an order that violates my client's civil rights, which is what occurred in this case for almost 7 years. THERE HAS NEVER BEEN A FINDING OF ENDANGERMENT AGAINST MY CLIENT, AND SHE HAS HAD RESTRICTED VISITATION FOR 7 YEARS!!!!!

If you want me to count the number of AGREED orders that were never entered by Judge Carr in the three cases I have him, I will go through and count every one. I am guessing 12-15 at least in one year.

From: Grace Dickler (Judiciary) <grace.dickler@cookcountyil.gov>

Sent: Thursday, July 15, 2021 4:56 PM

To: Mary T. Doheny <mtdoheny@mtdfamilylaw.com>; ted.bush <ted.bush@comcast.net>

Cc: Terry Bright (Chief Judge's Office) <terry.bright@cookcountyil.gov>; Kimberly Wilson (Chief Judge's Office)

<Kimberly.Wilson1@cookcountyil.gov>; Anthony Mazzone <unicochicago@hotmail.com>; Olga Mazzone

<olenkamazzone1@gmail.com>; Lauren Wynne (Chief Judge's Office) <Lauren.Wynne@cookcountyil.gov>

Subject: Re: IRMO Mazzone 2011 D 007189, 007317 Emergency Motion Filed

Ms. Bright, please schedule the case and forward me the order on Monday. I will enter it. I am off tomorrow.

Thank you,

GGD

From: Mary T. Doheny < mtdoheny@mtdfamilylaw.com>

Sent: Thursday, July 15, 2021 4:39 PM **To:** ted.bush < ted.bush@comcast.net>

Cc: Terry Bright (Chief Judge's Office) < terry.bright@cookcountyil.gov; Kimberly Wilson (Chief Judge's Office)

<Kimberly.Wilson1@cookcountyil.gov>; Anthony Mazzone <unicochicago@hotmail.com>; Olga Mazzone

<<u>olenkamazzone1@gmail.com</u>>; Lauren Wynne (Chief Judge's Office) <<u>Lauren.Wynne@cookcountyil.gov</u>>; Grace Dickler

(Judiciary) <grace.dickler@cookcountyil.gov>

Subject: Re: IRMO Mazzone 2011 D 007189, 007317 Emergency Motion Filed

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All:

I tried. By not agreeing to any order or any date, the case is now without any new date. Mr. Bush will not draft or agree to any order.

Best regards,

Mary Therese Doheny Attorney at Law Law Offices of Wessel & Doheny 1100 Lake Street Suite 280 A Oak Park, Illinois 60301

312.558.3000 Fax 312.558.1303

mtdoheny@mtdfamilylaw.com

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On Thu, Jul 15, 2021 at 4:14 PM < ted.bush@comcast.net > wrote:

What????? Of course we do not agree to this. And who in their right mind would send an order out into the ether to no assigned judge, intentionally delaying these proceedings out WEEKS when my client is not seeing or speaking to her son AT ALL, in ongoing violations of court orders.

Mary, you are representing Anthony. You have done this in other cases. This is unethical and absolutely sick!

That you have gotten away with this kind of stuff for years is precisely why this calendar needs someone (anyone) to stop this nonsense.

From: Mary T. Doheny < mtdoheny@mtdfamilylaw.com>

Sent: Thursday, July 15, 2021 4:04 PM
To: ted.bush < ted.bush@comcast.net>

Cc: Terry Bright (Chief Judge's Office) < terry.bright@cookcountyil.gov">terry.bright@cookcountyil.gov; Kimberly Wilson (Chief Judge's Office) < terry.bright@cookcountyil.gov; Anthony Mazzone < terry.bright@cookcountyil.gov; Anthony Mazzone < terry.bright@cookcountyil.gov; Grace terry.bright@cook

Dickler (Judiciary) < grace.dickler@cookcountyil.gov >

Subject: Re: IRMO Mazzone 2011 D 007189, 007317 Emergency Motion Filed

Dear all;

Attached is a proposed order setting matter back on call for the next date provided by Ms. Bright. It is not appropriate to ask for a particular judge and I hope that Judge Carr is ok.

Mr. Bush, attorney for Ms. Mazzone and Mr. Mazzone are copied on this email and their email addresses are in the order.

I do not know whether Mr. Bush will agree, as he wants another particular judge. He is copied this email.

Thank you. Best regards,

Mary Therese Doheny Attorney at Law Law Offices of Wessel & Doheny 1100 Lake Street Suite 280 A Oak Park, Illinois 60301

312.558.3000 Fax 312.558.1303

mtdoheny@mtdfamilylaw.com

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On Thu, Jul 15, 2021 at 12:18 PM <ted.bush@comcast.net> wrote:

Dear Hon. Grace Dickler,

Can you please assign this calendar to Judge Timothy Murphy temporarily? He is perhaps the only one in this division with the fortitude, heart, knowledge of law and skill to clean up the total mess which is Calendar 24.

Regards, Edwin F. Bush Attorney at Law Des Plaines, IL 202-487-8238

From: Terry Bright (Chief Judge's Office) <terry.bright@cookcountyil.gov>

Sent: Thursday, July 15, 2021 11:59 AM

To: ted.bush <ted.bush@comcast.net>; Mary T. Doheny <mtdoheny@mtdfamilylaw.com>

Cc: Kimberly Wilson (Chief Judge's Office) < Kimberly.Wilson1@cookcountyil.gov; unicochicago@hotmail.com; Olga

Mazzone < olenkamazzone1@gmail.com >

Subject: Re: IRMO Mazzone 2011 D 007189, 007317 Emergency Motion Filed

Good afternoon

Judge Carr will be out of the office until further notice and I'm not for sure who will be hearing our call. What should I do?

From: ted.bush < ted.bush@comcast.net > Sent: Wednesday, July 14, 2021 1:14 PM

To: Terry Bright (Chief Judge's Office) < < terry.bright@cookcountyil.gov >; Mary T. Doheny

<mtdoheny@mtdfamilylaw.com>

Cc: Kimberly Wilson (Chief Judge's Office) <Kimberly.Wilson1@cookcountyil.gov>; unicochicago@hotmail.com

<unicochicago@hotmail.com>; Olga Mazzone <olenkamazzone1@gmail.com> Subject: Re: IRMO Mazzone 2011 D 007189, 007317 Emergency Motion Filed

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Will Judge Carr actually read the motions and responses? There is no possible way 30 min is enough to clear through the pending matters.

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Terry Bright (Chief Judge's Office)" < terry.bright@cookcountyil.gov

Date: 7/13/21 3:15 PM (GMT-06:00)

To: "Mary T. Doheny" < mtdoheny@mtdfamilylaw.com>

Cc: ted.bush@comcast.net, "Kimberly Wilson (Chief Judge's Office)" <Kimberly.Wilson1@cookcountyil.gov>,

unicochicago@hotmail.com

Subject: Re: IRMO Mazzone 2011 D 007189, 007317 Emergency Motion Filed

Good afternoon

My first available date is 8/24 at 11:00 for 30 min? If that date works for all I will need you to agreed on the order.

Thank you

From: Mary T. Doheny <mtdoheny@mtdfamilylaw.com>

Sent: Monday, July 12, 2021 11:42 AM

To: Terry Bright (Chief Judge's Office) < terry.bright@cookcountyil.gov>

Cc: <u>ted.bush@comcast.net</u> < <u>ted.bush@comcast.net</u>>; Kimberly Wilson (Chief Judge's Office) < Kimberly.Wilson1@cookcountyil.gov>; unicochicago@hotmail.com < unicochicago@hotmail.com >

Subject: Re: IRMO Mazzone 2011 D 007189, 007317 Emergency Motion Filed

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Terry:

Can we have a date for a hearing? I will draft a simple order.

Best regards,

Mary Therese Doheny

Attorney at Law

Law Offices of Wessel & Doheny

1100 Lake Street

Suite 280 A

Oak Park, Illinois 60301

312.558.3000

Fax 312.558.1303

mtdoheny@mtdfamilylaw.com

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On Mon, Jul 12, 2021 at 10:28 AM Terry Bright (Chief Judge's Office) < terry.bright@cookcountyil.gov > wrote:

Good morning

When is the hearing on this case?

From: Mary T. Doheny < mtdoheny@mtdfamilylaw.com>

Sent: Monday, June 28, 2021 2:38 PM

To: Terry Bright (Chief Judge's Office) < terry.bright@cookcountyil.gov>

Cc: <u>ted.bush@comcast.net</u> < <u>ted.bush@comcast.net</u>>; Kimberly Wilson (Chief Judge's Office) < <u>Kimberly.Wilson1@cookcountyil.gov</u>>; <u>unicochicago@hotmail.com</u> < <u>unicochicago@hotmail.com</u>>

Subject: Re: IRMO Mazzone 2011 D 007189, 007317 Emergency Motion Filed

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Just checking that our opposition was received. It is attached.

Best regards,

Mary Therese Doheny

Attorney at Law

Law Offices of Wessel & Doheny

1100 Lake Street

Suite 280 A

Oak Park, Illinois 60301

312.558.3000

Fax 312.558.1303

mtdoheny@mtdfamilylaw.com

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On Mon, Jun 28, 2021 at 2:21 PM Terry Bright (Chief Judge's Office) < terry.bright@cookcountyil.gov wrote:

Good afternoon

I need the file stamped copy filed the clerk's office.

Thank you

Get Outlook for Android

From: ted.bush@comcast.net <ted.bush@comcast.net>

Sent: Saturday, June 26, 2021 1:25:43 PM

To: Kimberly Wilson (Chief Judge's Office) < Kimberly. Wilson1@cookcountyil.gov>

Cc: Terry Bright (Chief Judge's Office) < terry.bright@cookcountyil.gov; unicochicago@hotmail.com; 'Mary T. Doheny' < terry.bright@cookcountyil.gov; unicochicago@hotmail.com; 'Mary T. Doheny' < terry.bright@cookcountyil.gov; 'Olga Mazzone'

<olenkamazzone1@gmail.com>

Subject: IRMO Mazzone 2011 D 007189, 007317 Emergency Motion Filed

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Kimberly,

The attached emergency motion was filed today, envelope number 13835326 on Odyssey. This case is on Judge Carr's regular calendar. My understanding is Judge Cocozza is standing in for him until he returns on July 19, 2021. The parties are copied.

Regards,

Edwin F. Bush

Attorney at Law

Des Plaines, IL

202-487-8238

From: ted.bush@comcast.net

Sent: Friday, July 16, 2021 5:03 PM

To: 'Olga Mazzone'; 'Grace Dickler (Judiciary)'; 'Terry Bright (Chief Judge's Office)'

Cc: 'Anthony Mazzone'; 'Mary Doheny'

Subject: RE:

My client is in the hospital for her third surgery for complications arising from a defective breast implant that was removed, arising from a mastectonomy from breast cancer in 2016. She is under a lot of pain and medication. She will refrain from further ex parte communication.

From: Olga Mazzone <olenkamazzone1@gmail.com>

Sent: Friday, July 16, 2021 4:55 PM

To: ted.bush <ted.bush@comcast.net>; Grace Dickler (Judiciary) <grace.dickler@cookcountyil.gov>; Terry Bright (Chief

Judge's Office) <terry.bright@cookcountyil.gov>

Subject:

Just now Mary denied another order you proposed, Grace.

She is been doing it for 7 years now.

You really need to do something about it fast.

Please schedule my emergency motion to see my son first, it's a priority. Not for Mary.

She is not supposed to be a kids attorney, but on a list of serial kids abusers. And she is already.

From: ted.bush@comcast.net

Sent: Saturday, July 17, 2021 11:28 AM

To: 'Grace Dickler (Judiciary)'; 'Terry Bright (Chief Judge's Office)'

Cc: 'Mary Doheny'; 'Anthony Mazzone'; 'Olga Mazzone'; 'Lauren Wynne (Chief Judge's Office)'

Subject: RE: IRMO Mazzone 2011 D 007189, 007317 Emergency Motion Filed

Attachments: mazzone order 071721.docx

Given the limited information available to me, this is my best effort to draft a continuance order. I am presuming a transfer order is not necessary. If so, I will draft one as well.

Regards, Edwin F. Bush Attorney at Law Des Plaines, IL 202-487-8238

From: Grace Dickler (Judiciary) <grace.dickler@cookcountyil.gov>

Sent: Saturday, July 17, 2021 10:36 AM

To: Terry Bright (Chief Judge's Office) < terry.bright@cookcountyil.gov>

Cc: ted.bush@comcast.net; Mary Doheny <mtdoheny@mtdfamilylaw.com>; Anthony Mazzone

<unicochicago@hotmail.com>; Olga Mazzone <olenkamazzone1@gmail.com>; Lauren Wynne (Chief Judge's Office)

<Lauren.Wynne@cookcountyil.gov>

Subject: Re: IRMO Mazzone 2011 D 007189, 007317 Emergency Motion Filed

That is not correct Ms. Bright. The Judge assigned to the calendar will be hearing the case.

Sent from my iPhone

On Jul 16, 2021, at 12:06 PM, Terry Bright (Chief Judge's Office) <terry.bright@cookcountyil.gov> wrote:

Thank you very much for your kind words. Judge Dickler will be hearing this case until Judge Carr return.

From: ted.bush@comcast.net <ted.bush@comcast.net>

Sent: Friday, July 16, 2021 11:00 AM

<terry.bright@cookcountyil.gov>

Cc: 'Anthony Mazzone' <<u>unicochicago@hotmail.com</u>>; 'Olga Mazzone' <<u>Olenkamazzone1@gmail.com</u>>; Lauren Wynne (Chief Judge's Office) <<u>Lauren.Wynne@cookcountyil.gov</u>>; Grace Dickler (Judiciary) <<u>grace.dickler@cookcountyil.gov</u>>

Subject: RE: IRMO Mazzone 2011 D 007189, 007317 Emergency Motion Filed

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Removing Kimberly, per her request. Who is the judge hearing this? I presume it is no longer Judge Cocozza.

And Terry, the poise and the patience you have always exhibited, under perpetually difficult circumstances, I hope has not gone unnoticed amongst your colleagues and supervisors. I do not envy your job.

From: Mary Doheny < mtdoheny@mtdfamilylaw.com>

Sent: Friday, July 16, 2021 10:47 AM

kimberly.wilson1@cookcountyil.gov; Anthony Mazzone <unicochicago@hotmail.com; Olga Mazzone

<<u>Olenkamazzone1@gmail.com</u>>; Lauren Wynne (Chief Judge's Office)

<Lauren.Wynne@cookcountyil.gov>; Grace Dickler (Judiciary) <grace.dickler@cookcountyil.gov>

Subject: Re: IRMO Mazzone 2011 D 007189, 007317 Emergency Motion Filed

I have sent a order and just need to change the date..

Mary Therese Doheny Attorney at Law 1100 Lake Street Suite 280AB Oak Park, IL 60301

(312) 558-3000

On Jul 16, 2021, at 10:27 AM, Terry Bright (Chief Judge's Office) <terry.bright@cookcountyil.gov> wrote:

Good morning

How's 7/29 at 11:30?

From: ted.bush@comcast.net <ted.bush@comcast.net>

Sent: Thursday, July 15, 2021 5:58 PM

To: 'Mary T. Doheny' < mtdoheny@mtdfamilylaw.com>

wynne (Chief Judge's Office) < <u>Lauren. Wynne@cookcountyii.gov</u>>;

(Judiciary) < grace.dickler@cookcountyil.gov >

Subject: RE: IRMO Mazzone 2011 D 007189, 007317 Emergency Motion Filed

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We don't even have a judge. Terry Bright is Judge Carr's coordinator, who allegedly had a stroke. We are being told he is out until further notice. Why would we agree to a time weeks away, with an ongoing clear emergency, when the stand-in judge may have a conflict -- delaying this out even further?? This is child abuse and neglect.

From: Mary T. Doheny < mtdoheny@mtdfamilylaw.com>

Sent: Thursday, July 15, 2021 4:39 PM **To:** ted.bush < ted.bush@comcast.net>

Cc: Terry Bright (Chief Judge's Office) < terry.bright@cookcountyil.gov; Kimberly Wilson (Chief Judge's Office) < terry.bright@cookcountyil.gov; Anthony Mazzone < terry.wilson; Chief Judge's Office) < terry.wilson; Chief Judge's Office) < terry.wilson2; Grace Dickler (Judiciary) < <a h

Subject: Re: IRMO Mazzone 2011 D 007189, 007317 Emergency Motion Filed

All:

I tried. By not agreeing to any order or any date, the case is now without any new date. Mr. Bush will not draft or agree to any order.

Best regards,

Mary Therese Doheny Attorney at Law Law Offices of Wessel & Doheny 1100 Lake Street Suite 280 A Oak Park, Illinois 60301

312.558.3000 Fax 312.558.1303

mtdoheny@mtdfamilylaw.com

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On Thu, Jul 15, 2021 at 4:14 PM < ted.bush@comcast.net> wrote:

What????? Of course we do not agree to this. And who in their right mind would send an order out into the ether to no assigned judge, intentionally delaying these proceedings out WEEKS when my client is not seeing or speaking to her son AT ALL, in ongoing violations of court orders.

Mary, you are representing Anthony. You have done this in other cases. This is unethical and absolutely sick!

That you have gotten away with this kind of stuff for years is precisely why this calendar needs someone (anyone) to stop this nonsense.

From: Mary T. Doheny <mtdoheny@mtdfamilylaw.com>

Sent: Thursday, July 15, 2021 4:04 PM **To:** ted.bush < ted.bush@comcast.net>

Cc: Terry Bright (Chief Judge's Office) < terry.bright@cookcountyil.gov; Kimberly Wilson (Chief Judge's Office) < terry.bright@cookcountyil.gov; Anthony Mazzone < terry.wilson1@cookcountyil.gov; Anthony Mazzone < terry.wilson1@cookcountyil.gov; Grace Dickler (Judiciary) < terry.wilson1@cookcountyil.gov <a href="mailto:terry.wilson1@cookc

Subject: Re: IRMO Mazzone 2011 D 007189, 007317 Emergency Motion Filed

Dear all;

Attached is a proposed order setting matter back on call for the next date provided by Ms. Bright. It is not appropriate to ask for a particular judge and I hope that Judge Carr is ok.

Mr. Bush, attorney for Ms. Mazzone and Mr. Mazzone are copied on this email and their email addresses are in the order.

I do not know whether Mr. Bush will agree, as he wants another particular judge. He is copied this email.

Thank you. Best regards,

Mary Therese Doheny Attorney at Law Law Offices of Wessel & Doheny 1100 Lake Street Suite 280 A Oak Park, Illinois 60301

312.558.3000 Fax 312.558.1303

mtdoheny@mtdfamilylaw.com

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On Thu, Jul 15, 2021 at 12:18 PM < ted.bush@comcast.net > wrote:

Dear Hon. Grace Dickler,

Can you please assign this calendar to Judge Timothy Murphy temporarily? He is perhaps the only one in this division with the fortitude, heart, knowledge of law and skill to clean up the total mess which is Calendar 24.

Regards, Edwin F. Bush Attorney at Law Des Plaines, IL 202-487-8238

From: Terry Bright (Chief Judge's Office) < terry.bright@cookcountyil.gov>

Sent: Thursday, July 15, 2021 11:59 AM

To: ted.bush < ted.bush@comcast.net >; Mary T. Doheny

<mtdoheny@mtdfamilylaw.com>

Cc: Kimberly Wilson (Chief Judge's Office) < kimberly.Wilson1@cookcountyil.gov; unicochicago@hotmail.com; Olga Mazzone olenkamazzone1@gmail.com> Subject: Re: IRMO Mazzone 2011 D 007189, 007317 Emergency Motion Filed

Good afternoon

Judge Carr will be out of the office until further notice and I'm not for sure who will be hearing our call. What should I do?

From: ted.bush < ted.bush@comcast.net > Sent: Wednesday, July 14, 2021 1:14 PM

To: Terry Bright (Chief Judge's Office) < terry.bright@cookcountyil.gov; Mary T. Doheny < terry.bright@cookcountyil.gov; Mary T. Doheny < terry.bright@cookcountyil.gov; Mary T.

Cc: Kimberly Wilson (Chief Judge's Office) < <a href="m

Subject: Re: IRMO Mazzone 2011 D 007189, 007317 Emergency Motion Filed

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Will Judge Carr actually read the motions and responses? There is no possible way 30 min is enough to clear through the pending matters.

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Terry Bright (Chief Judge's Office)" < terry.bright@cookcountyil.gov

Date: 7/13/21 3:15 PM (GMT-06:00)

To: "Mary T. Doheny" < mtdoheny@mtdfamilylaw.com>

Cc: ted.bush@comcast.net, "Kimberly Wilson (Chief Judge's Office)" <Kimberly.Wilson1@cookcountyil.gov>, unicochicago@hotmail.com

Subject: Re: IRMO Mazzone 2011 D 007189, 007317 Emergency Motion Filed

Good afternoon

My first available date is 8/24 at 11:00 for 30 min? If that date works for all I will need you to agreed on the order.

Thank you

From: Mary T. Doheny <mtdoheny@mtdfamilylaw.com>

Sent: Monday, July 12, 2021 11:42 AM

To: Terry Bright (Chief Judge's Office) < terry.bright@cookcountyil.gov>

Cc: ted.bush@comcast.net <ted.bush@comcast.net>; Kimberly Wilson (Chief Judge's

Office) < Kimberly. Wilson 1@cookcountyil.gov>; unicochicago@hotmail.com

<unicochicago@hotmail.com>

Subject: Re: IRMO Mazzone 2011 D 007189, 007317 Emergency Motion Filed

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Terry: Can we have a date for a hearing? I will draft a simple order.

Best regards,

Mary Therese Doheny

Attorney at Law

Law Offices of Wessel & Doheny

1100 Lake Street

Suite 280 A

Oak Park, Illinois 60301

312.558.3000

Fax 312.558.1303

mtdoheny@mtdfamilylaw.com

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On Mon, Jul 12, 2021 at 10:28 AM Terry Bright (Chief Judge's Office) < terry.bright@cookcountyil.gov> wrote:

Good morning

When is the hearing on this case?

From: Mary T. Doheny < mtdoheny@mtdfamilylaw.com>

Sent: Monday, June 28, 2021 2:38 PM

To: Terry Bright (Chief Judge's Office) < terry.bright@cookcountyil.gov>

Cc: ted.bush@comcast.net <ted.bush@comcast.net>; Kimberly Wilson (Chief Judge's

Office) < Kimberly.Wilson1@cookcountyil.gov; unicochicago@hotmail.com

<unicochicago@hotmail.com>

Subject: Re: IRMO Mazzone 2011 D 007189, 007317 Emergency Motion Filed

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Just checking that our opposition was received. It is attached.

Best regards,

Mary Therese Doheny

Attorney at Law

Law Offices of Wessel & Doheny

1100 Lake Street

Suite 280 A

Oak Park, Illinois 60301

312.558.3000

Fax 312.558.1303

mtdoheny@mtdfamilylaw.com

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On Mon, Jun 28, 2021 at 2:21 PM Terry Bright (Chief Judge's Office) terry.bright@cookcountyil.gov> wrote:

Good afternoon

I need the file stamped copy filed the clerk's office.

Thank you

Get Outlook for Android

From: ted.bush@comcast.net>

Sent: Saturday, June 26, 2021 1:25:43 PM

To: Kimberly Wilson (Chief Judge's Office) < Kimberly. Wilson1@cookcountyil.gov>

Cc: Terry Bright (Chief Judge's Office) < terry.bright@cookcountyil.gov; unicochicago@hotmail.com; 'Mary T. Doheny' < mtdoheny@mtdfamilylaw.com; 'Olga Mazzone' < olenkamazzone1@gmail.com>

Subject: IRMO Mazzone 2011 D 007189, 007317 Emergency Motion Filed

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Kimberly,

The attached emergency motion was filed today, envelope number 13835326 on Odyssey. This case is on Judge Carr's regular calendar. My understanding is Judge Cocozza is standing in for him until he returns on July 19, 2021. The parties are copied. Regards,

Edwin F. Bush

Attorney at Law

Des Plaines, IL

202-487-8238

From: ted.bush@comcast.net

Sent: Monday, July 19, 2021 2:40 PM

To: 'Mary T. Doheny'; 'Grace Dickler (Judiciary)'

Cc: 'Terry Bright (Chief Judge's Office)'; 'Anthony Mazzone'; 'Olga Mazzone'

Subject: RE: IRMO Mazzone 2011 D 007189, 007317, Calendar 24- Proposed Order for Entry

Mary, can you please stop attempting to schedule the wrong contempt motion. I have written this to you at least 10 times. The first contempt motion on 10/09/18 was already heard. The SECOND contempt motion, filed on 1/31/19 is what we are setting for hearing. This includes the count that Anthony has failed to submit a financial affidavit since 2013, despite there being pending financial matters for years. Why do you keep doing this? This is bizarre.

From: Mary T. Doheny <mtdoheny@mtdfamilylaw.com>

Sent: Monday, July 19, 2021 9:54 AM

To: Grace Dickler (Judiciary) <grace.dickler@cookcountyil.gov>

Cc: Terry Bright (Chief Judge's Office) < terry.bright@cookcountyil.gov>; Anthony Mazzone

<unicochicago@hotmail.com>; ted.bush <ted.bush@comcast.net>

Subject: IRMO Mazzone 2011 D 007189, 007317, Calendar 24- Proposed Order for Entry

Dear All,

Attached please find the proposed order setting this matter over to July 29, 2021 at 11:30 a.m. I was unclear if this was a hearing or a status date, so I have attached two orders, one for a hearing, and one for status.

Best regards,

Mary Therese Doheny

Attorney at Law

Law Offices of Wessel & Doheny

1100 Lake Street

Suite 280 A

Oak Park, Illinois 60301

312.558.3000

Fax 312.558.1303

mtdoheny@mtdfamilylaw.com

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On Fri, Jul 16, 2021 at 9:02 PM Mary Doheny mtdfamilylaw.com wrote:

Thank you all.. Good night.

Mary Therese Doheny Attorney at Law 1100 Lake Street Suite 280AB Oak Park, IL 60301

(312) 558-3000

On Jul 16, 2021, at 11:00 AM, ted.bush@comcast.net wrote:

Removing Kimberly, per her request. Who is the judge hearing this? I presume it is no longer Judge Cocozza.

And Terry, the poise and the patience you have always exhibited, under perpetually difficult circumstances, I hope has not gone unnoticed amongst your colleagues and supervisors. I do not envy your job.

From: ted.bush@comcast.net

Sent: Wednesday, September 1, 2021 8:37 PM

To: 'Olga Mazzone'; 'UNICO CHICAGO'; 'Grace Dickler (Judiciary)'; 'Lauren Wynne (Chief Judge's Office)'

Cc: 'Mary T. Doheny' **Subject:** RE: Vincenzo

This is unacceptable and I will bring this case to the media (like I did Pasulka), along with the other 10 or so I spent the last 2 years compiling, and a federal lawsuit I have pending on the avalanche of sua sponte custody orders.

Shame on the profession of law for allowing this disgrace and cancer to spread. Shame on you all for turning an industry into abusing children for attorneys fees. You have picked on a registered nurse like a schoolyard bully for over 7 years.

https://www.youtube.com/watch?v=pBVVOEB St0 (9:40 mark)

No regards, Edwin F. Bush Attorney at Law Des Plaines, IL 202-487-8238

From: Olga Mazzone <olenkamazzone1@gmail.com>

Sent: Wednesday, September 1, 2021 6:43 PM

To: UNICO CHICAGO <unicochicago@hotmail.com>; Grace Dickler (Judiciary) <grace.dickler@cookcountyil.gov>

Cc: ted.bush <ted.bush@comcast.net>; Mary T. Doheny <mtdoheny@mtdfamilylaw.com>

Subject: Re: Vincenzo

Rather than helping your client get better in the situation she's been in for years because of HER psychotic behavior-ARE YOU AN MD? WHAT IS THE COURT ORDER?

On Wed, Sep 1, 2021 at 4:38 PM UNICO CHICAGO < unicochicago@hotmail.com> wrote:

No matter how many times you keep preaching your lies, they are still lies. Rather than helping your client get better in the situation she's been in for years because of HER psychotic behavior, you continue to egg her on with bad advice and add fuel to the fire. You should really change your behavior!

Get Outlook for Android

From: ted.bush < ted.bush@comcast.net >

Sent: Wednesday, September 1, 2021 12:32:01 PM

To: Olga Mazzone <olenkamazzone1@gmail.com>; Mary T. Doheny <mtdoheny@mtdfamilylaw.com>;

unicochicago@hotmail.com <unicochicago@hotmail.com >; Grace Dickler (Judiciary) <grace.dickler@cookcountyil.gov >;

Jesse Blanco < jesse 4846@yahoo.com>

Subject: RE: Vincenzo

Mary Doheny and Judge Carr violated Olga's rights on sua sponte orders for years. There is no finding against Olga, yet Mary Doheny causes her civil rights to be violated. Judge Shapiro just did a fabulous job revealing to the world what happens everyday at the Daley Center.

It is time for Judge Dickler to intervene, as it appears only the media gives relief from blatant abuses of procedural and substantive rights. That must change.

My client does not consent to the ongoing racketeering by Mary Doheny.

Sent from my Galaxy

----- Original message -----

From: Olga Mazzone < olenkamazzone1@gmail.com >

Date: 9/1/21 11:51 AM (GMT-06:00)

To: "Mary T. Doheny" <<u>mtdoheny@mtdfamilylaw.com</u>>, "ted.bush" <<u>ted.bush@comcast.net</u>>, <u>unicochicago@hotmail.com</u>, "Grace Dickler (Judiciary)" <<u>grace.dickler@cookcountyil.gov</u>>, Jesse Blanco <<u>jesse4846@yahoo.com</u>>

Subject: Vincenzo

Hi, Jesse, I need a visit with my son , I am available anytime.

Mary despite a court order to give me visitation without supervision ignoring me.

So I only have an option to see my son with you.

Please reply when are you available. And you Mary, need to reply!

--

Thank you, Olga.

From: ted.bush@comcast.net

Sent: Tuesday, August 17, 2021 10:26 AM **To:** 'Nairee Hagopian (Chief Judge's Office)'

Cc: 'Steve Wasko'; 'Grace Dickler (Judiciary)'; 'Timothy Murphy (Judiciary)'; 'Erika Bush'; 'Lauren Wynne

(Chief Judge's Office)'

Subject: RE: IRMO Bush 2017D230075 -- Scheduling Appellate Court Remand That Was Intentionally Violated

By Judge Carr

I want a hearing on the March 23, 2020 motion for a TEMPORARY parenting schedule. The full hearing on parenting time, ordered by the appellate court, will take FAR more than an afternoon. The mandate of the appellate court has been breached badly, and continues to be so.

I just sent you the pleadings.

Everyone knows that Judge Carr was not well for some time. You people better fix this before it blows sky high. It will.

Regards,

Ted

From: Nairee Hagopian (Chief Judge's Office) <nairee.hagopian@cookcountyil.gov>

Sent: Tuesday, August 17, 2021 10:21 AM

To: ted.bush@comcast.net

Cc: 'Steve Wasko' <swasko@waskolaw.com>; Grace Dickler (Judiciary) <grace.dickler@cookcountyil.gov>; Timothy Murphy (Judiciary) <timothy.murphy@cookcountyil.gov>; 'Erika Bush' <erika25bush@gmail.com>; Lauren Wynne (Chief Judge's Office) <Lauren.Wynne@cookcountyil.gov>

Subject: Re: IRMO Bush 2017D230075 -- Scheduling Appellate Court Remand That Was Intentionally Violated By Judge Carr

Dear Mr. Bush:

I am not able to determine whether your motion is an emergency and move up your case sooner. Judge Johnson said that you are to be set for one day trial on September 27, 2021. The trial will be scheduled for 9:00 am. I kindly ask that you please email me the pleadings relating to the issue that will be on trial that date and any responses.

I will be sending you a trial order later today.

Best,

Nairee Hagopian Administrator Domestic Relations Division Richard J. Daley Center 50 W. Washington Street Room 1901 B Chicago, IL 60602 Direct Phone Number - 312-603-3037 From: ted.bush@comcast.net <ted.bush@comcast.net>

Sent: Tuesday, August 17, 2021 10:13 AM

To: Nairee Hagopian (Chief Judge's Office) < nairee.hagopian@cookcountyil.gov >

Cc: 'Steve Wasko' < swasko@waskolaw.com; Grace Dickler (Judiciary) < grace.dickler@cookcountyil.gov; Timothy Murphy (Judiciary) < timothy.murphy@cookcountyil.gov; 'Erika Bush' < erika25bush@gmail.com; Lauren Wynne (Chief

Judge's Office) <Lauren. Wynne@cookcountyil.gov>

Subject: IRMO Bush 2017D230075 -- Scheduling Appellate Court Remand That Was Intentionally Violated By Judge Carr

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Nairee,

We need a date for a hearing on an emergency basis. Judge Johnson indicated 09/27/21, but that is not good enough. I have an appointment with an oncologist in 2 hours for a pancreatic tumor.

On March 23, 2020, during the onset of Covid-19, I filed an emergency motion to establish a temporary parenting schedule AFTER the appellate court vacated the 02/13/19 judgment on 12/13/19. This motion was denied as not an emergency and NEVER heard by Judge Carr. This motion seeks a TEMPORARY schedule before there is a FINAL hearing on parenting time as ordered by the appellate court. The appellate court order has been grossly violated. I want an emergency hearing on a TEMPORARY parenting schedule that I have never gotten – EVER.

I was in federal court before Judge Feinerman on Friday. I am suing Judge Carr in equity for violating the order of the appellate court and violating my family's civil rights. The Assistant Attorney General told Judge Feinerman that Judge Carr is out with a health condition indefinitely. This was recorded. Judge Feinerman is tracking Judge Carr's absence and watching this case. We all know it is a brain tumor and Judge Carr is not coming back, and that Judge Carr was impaired for quite some time. When I stated such to Judge Feinerman, there was no dispute.

Due the size of the file, the following is the link to Exhibit A of the 07/22/21 motion, which is also an exhibit in federal court to a pending motion in *A.B. et al. v. Carr*, 20-cv-6634, ECF 38 Ex. E. This motion includes a PUBLISHED 7th Circuit Court of appeals decision involving Erika Bush lying under oath (see pgs. 3-4).

https://drive.google.com/file/d/1Zril76YdewE7cjb-O8voOKg 3OTd0g4h/view?usp=sharing

In case you are concerned about the security of google drive, see the same video here: https://www.youtube.com/watch?v=nQ9MYSaYpVY&t=5s

Regards, Edwin F. Bush Attorney at Law Des Plaines, IL 202-487-8238

From: ted.bush@comcast.net

Sent: Tuesday, August 17, 2021 11:56 AM

To: 'Erika Bush'; 'Nairee Hagopian (Chief Judge's Office)'

Cc: 'Steve Wasko'; 'Grace Dickler (Judiciary)'; 'Timothy Murphy (Judiciary)'; 'Lauren Wynne (Chief Judge's

Office)'; 'Terry Bright'

Subject: RE: IRMO Bush 2017D230075 -- Scheduling Appellate Court Remand That Was Intentionally Violated

By Judge Carr

Everyone meet Erika Bush, who has been lying and manipulating her way through this for over four years, with corrupt Steve Wasko in tow profiteering all the way.

I want Steve Wasko out of this case immediately. You people need to start training your GAL/CR's. I have seen more honest work on a construction site on the Soprano's. I spoke to a Ph.D. psychologist this morning, among many others, who indicate these people are all hacks and profiteer off of conflict with no actual skill.

I know extortion when I see it, and am 2 for 2 in convincing federal law enforcement. The public corruption unit of the Chicago FBI was just at my place this morning, following up an investigation of one of your own leaders. When I first met them in June, they had the GAL/CR approved list already for some time. Just keep doing nothing. The age of extorting and profiteering off of parents and children is coming to an end.

From: Erika Bush <erika25bush@gmail.com> Sent: Tuesday, August 17, 2021 11:10 AM

To: Nairee Hagopian (Chief Judge's Office) <nairee.hagopian@cookcountyil.gov>

Cc: ted.bush@comcast.net; Steve Wasko <swasko@waskolaw.com>; Grace Dickler (Judiciary)

<grace.dickler@cookcountyil.gov>; Timothy Murphy (Judiciary) <timothy.murphy@cookcountyil.gov>; Lauren Wynne
(Chief Judge's Office) <Lauren.Wynne@cookcountyil.gov>; Terry Bright <terry.bright@cookcountyil.gov>; Kaye Mason
<kaye.mason@cookcountyil.gov>

Subject: Re: IRMO Bush 2017D230075 -- Scheduling Appellate Court Remand That Was Intentionally Violated By Judge Carr

Hello Kate

I need your help. On the call this morning Judge Johnson gave 2 dates early November and late November. Mr Bush yelled at Judge Johnson and demanded an walker date. Sept 27th was given however this date was not consulted with Mr Wasko. I mentioned during the call that I was not able to be there in the 27th because of my work. I am the o my parents who supports my 2 kids. Then Terry came into the call and the Judge said for all parties to agree on a date. Can you please provide other available dates so we can move forward please?

Thank You, Eriks

Sent from my iPhone

On Aug 17, 2021, at 10:52 AM, Nairee Hagopian (Chief Judge's Office) <nairee.hagopian@cookcountyil.gov> wrote:

Dear Ms. Bush:

This is the date that Judge Johnson told all of the parties while on Zoom. I am not able to change the date.

Thank you.

Best,

Nairee Hagopian Administrator Domestic Relations Division Richard J. Daley Center 50 W. Washington Street Room 1901 B Chicago, IL 60602 Direct Phone Number - 312-603-3037 Domestic Relations Division - 312-603-3025

From: Erika Bush < erika25bush@gmail.com>
Sent: Tuesday, August 17, 2021 10:50 AM

To: Nairee Hagopian (Chief Judge's Office) < nairee.hagopian@cookcountyil.gov >

Cc: ted.bush@comcast.net <ted.bush@comcast.net>; Steve Wasko <swasko@waskolaw.com>; Grace

Dickler (Judiciary) < grace.dickler@cookcountyil.gov<">grace.dickler@cookcountyil.gov; Timothy Murphy (Judiciary) < timothy.murphy@cookcountyil.gov; Lauren Wynne (Chief Judge's Office)

<Lauren.Wynne@cookcountyil.gov>

Subject: Re: IRMO Bush 2017D230075 -- Scheduling Appellate Court Remand That Was Intentionally

Violated By Judge Carr

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Hello Nairee

Can we move the date for the following week. I work and I am not able to take off from work that day.

I just want to let you that given the behavior of Mr. Bush addressing the court and everyone involved, he has ordered Mr Bush to pay for a court reporter for every status session and court appearance to have documents in what transpires. Also please let the Judge know that Mr Bush records the zoom meetings then posts them in YouTube. This has been a very critical point with this case. He has been told not to do this yet continues to do this.

Also there is a current order of protection against Edwin(Ted). Do you have copies of those records or do you need me to send them to you.

I am not an attorney so I am not sure how all these things work.

Thank You

Sent from my iPhone

On Aug 17, 2021, at 10:21 AM, Nairee Hagopian (Chief Judge's Office) < nairee.hagopian@cookcountyil.gov > wrote:

Dear Mr. Bush:

I am not able to determine whether your motion is an emergency and move up your case sooner. Judge Johnson said that you are to be set for one day trial on September 27, 2021. The trial will be scheduled for 9:00 am. I kindly ask that you please email me the pleadings relating to the issue that will be on trial that date and any responses.

I will be sending you a trial order later today.

Best,

Nairee Hagopian Administrator Domestic Relations Division Richard J. Daley Center 50 W. Washington Street Room 1901 B Chicago, IL 60602 Direct Phone Number - 312-603-3037 Domestic Relations Division - 312-603-3025

From: ted.bush@comcast.net < ted.bush@comcast.net >

Sent: Tuesday, August 17, 2021 10:13 AM

To: Nairee Hagopian (Chief Judge's Office) < nairee.hagopian@cookcountyil.gov >

Cc: 'Steve Wasko' < <u>swasko@waskolaw.com</u>>; Grace Dickler (Judiciary)

<grace.dickler@cookcountyil.gov>; Timothy Murphy (Judiciary)

<timothy.murphy@cookcountvil.gov>: 'Erika Bush' <erika25bush@gmail.com>: Lauren

Wynne (Chief Judge's Office) < Lauren. Wynne@cookcountyil.gov >

Subject: IRMO Bush 2017D230075 -- Scheduling Appellate Court Remand That Was

Intentionally Violated By Judge Carr

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Nairee,

We need a date for a hearing on an emergency basis. Judge Johnson indicated 09/27/21, but that is not good enough. I have an appointment with an oncologist in 2 hours for a pancreatic tumor.

On March 23, 2020, during the onset of Covid-19, I filed an emergency motion to establish a temporary parenting schedule AFTER the appellate court vacated the 02/13/19 judgment on 12/13/19. This motion was denied as not an emergency and NEVER heard by Judge Carr. This motion seeks a TEMPORARY schedule before there is a FINAL hearing on parenting time as ordered by the appellate court. The appellate court order has been grossly violated. I want an emergency hearing on a TEMPORARY parenting schedule that I have never gotten — EVER.

I was in federal court before Judge Feinerman on Friday. I am suing Judge Carr in equity for violating the order of the appellate court and violating my family's civil rights. The Assistant Attorney General told Judge Feinerman that Judge Carr is out with a health condition indefinitely. This was recorded. Judge Feinerman is tracking Judge Carr's absence and watching this case. We all know it is a brain tumor and Judge Carr is not coming back, and that Judge Carr was impaired for quite some time. When I stated such to Judge Feinerman, there was no dispute.

Due the size of the file, the following is the link to Exhibit A of the 07/22/21 motion, which is also an exhibit in federal court to a pending motion in *A.B. et al. v. Carr*, 20-cv-6634, ECF 38 Ex. E. This motion includes a PUBLISHED 7th Circuit Court of appeals decision involving Erika Bush lying under oath (see pgs. 3-4).

https://drive.google.com/file/d/1Zril76YdewE7cjb-O8voOKg_3OTd0g4h/view?usp=sharing

In case you are concerned about the security of google drive, see the same video here: https://www.youtube.com/watch?v=nQ9MYSaYpVY&t=5s

Regards, Edwin F. Bush Attorney at Law Des Plaines, IL 202-487-8238

From: ted.bush@comcast.net

Sent: Thursday, July 1, 2021 5:19 PM

To: 'Renfroe, Scott'

Cc: 'Andrzejewski, Vicki'; 'Collins, David'

Subject: RE: Vanderporten and Mammas (2020IN00342, 2021IN00860, 2021IN00861, 20201IN00876)

Attachments: Mazzone-Motion To Discharge Doheny combined with exhibits2 filed.pdf

Attached is attachment #11, a motion filed in the IRMO Mazzone case last week. Mary Doheny is now the Chair of the Child Representative Selection and Training Committee in Cook County, replacing David Pasulka. The record of her misconduct, including concealing positive counseling reports and preventing counselors from making recommendations, is extreme.

The day after I filed this, I coincidentally got a call from the Chicago Field Office of the F.B.I. The public corruption division of the Chicago Field Office continues to have the most convictions of any field office in the country. They reviewed this entire document and we spoke about it for 90 minutes last week at their office. They asked me detailed questions, and indicated they have received countless complaints of abuses. They are further reviewed Exhibit A, and had specific questions about it. I was shocked to learn that they were already pursuing these cases, including child representatives manipulating and exerting undue influence on counselors. I couldn't believe it. They seem more interested in the tradecraft of unethical child representatives than the ARDC.

Regards, Edwin F. Bush Attorney at Law Des Plaines, IL 202-487-8238

From: ted.bush@comcast.net <ted.bush@comcast.net>

Sent: Thursday, July 1, 2021 4:57 PM **To:** 'Renfroe, Scott' <srenfroe@iardc.org>

Cc: 'Andrzejewski, Vicki' <vandrzejewski@iardc.org>; 'Collins, David' <DCollins@iardc.org>

Subject: RE: Vanderporten and Mammas (2020IN00342, 2021IN00860, 2021IN00861, 20201IN00876)

Scott,

Your June 8, 2021 e-mail did not indicate whether you re-opened the investigation regarding 2021IN00860 and 2021IN00861. Replying to a closed case would appear to be a fruitless exercise. Nevertheless, I will reply and I apologize for being about a week late. I have been very busy and overwhelmed with my own case and the other clients I represent. I just read Mr. Mammas and Ms. Vanderporten's response, dated, May 7, 2021, for the first time today. I received it on June 8, 2021, after you closed the case and indicated my lack of reply was a factor in its dismissal. You further acknowledged that I never received their response because their response was delivered to the wrong e-mail address "ted.bush@comast.net."

Page 1:

As David Collins is well aware, Steve Wasko made a referral on behalf of Judge Carr, 2020IN00342, which is still open. I never received e-mail notification that this case was opened either, despite getting e-mail notifications from the ARDC before the Covid 19 emergency remote measures being implemented. In prior correspondence with David Collins, I was told that this notification was in fact e-mailed to me. Your June 8, 2021 4:25 p.m. e-mail indicates that there was in fact