

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

In the Matter of:

KATHERINE A. PATERNO,
Respondent,
No. 6256503.

Commission No. 2024PR00010

AMENDED ANSWER TO COMPLAINT AND AFFIRMATIVE DEFENSES

Katherine A. Kardasz Paterno, Respondent, through Paterno Law Offices, LLC, amends her answer and affirmative defenses filed by her former attorney in this matter, as follows:

DISCLOSURE PURSUANT TO COMMISSION RULE 231

- a. Respondent is licensed before the U.S. District Court for the Northern District of Illinois and her license has never been subject to discipline.
- b. Respondent maintains a real estate license that has never been subject to discipline.

COUNT I

1. At all times alleged in this complaint, Respondent was a sole practitioner and the sole owner of a law firm styled as Paterno Law Office, LLC, which was located in Burr Ridge, and which concentrated its practice in real estate and employment matters. Respondent was also a licensed notary.

ANSWER: Admitted excepting that Respondent's law firm's concentration was a general practice.

2. [1] On or about October 1, 2006, Respondent's father Phillip Kardasz ("Phillip") executed a final will and documents establishing a living trust. [2] The final will was entitled "Last Will of Phillip G. Kardasz" (Phillip's Will"). [3] Phillip's Will provided that upon his death, all of his property would be distributed to his living trust. [4] The living trust was titled the "Phillip G. Kardasz Living Trust, dated October 1, 2006." [5] Phillip subsequently amended the Trust on August 5, 2008 and on August 27, 2011 (collectively, "Phillip's Trust"). [6] Phillip's

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Trust named Phillip's wife Betty Kay Kardasz ("Kay") or an individual named Robert Siemers as sole trustee of the Phillip's Trust upon his death.

AMENDED ANSWER: Admitted that Phillip Kardasz executed his final estate documents on Oct. 1, 2006 that included a living trust titled the "Phillip G. Kardasz Living Trust, dated Oct. 1, 2006" ("Trust"), **his Declaration of Trust Ownership, dated Oct. 1, 2006, (that provided the mechanism to move mistitled assets into his trust regardless of how titled or from what funds purchased, including jointly held, and his pour-over will entitled the "Last Will and Testament of "Phillip G. Kardasz" ("Will") and that Phillip Kardasz amended and restated his Trust, including on Aug. 5, 2008 and on Aug. 27, 2011, on Oct. 15, 2015, retyped on Aug. 1, 2018, because Phillip Kardasz changed his descendant beneficiary distribution and as such was amended in Betty Kay Kardasz's Trust since Article 7 in both their trusts pertained to to each spouse's 50% interest in 723 67th Place and how each autonomously decided which of his or her descendants were to receive a share. Further state, that the retyping of the 205 restatement and amendments was discovered during litigation in the related DuPage Case No. 20MR923 due to Counter-Defendant Betty Kay [Day] Kardasz's tampering with Phillip Kardasz's and her trusts. As for [2], Phillip Kardasz's Will speaks for itself and further state that Attorney William Slate's Aug. 15, 2006 letter to Phillip Kardasz specifically states that it was prepared to avoid probate by its initial funding provision and Phillip Kardasz's Declaration of Trust Ownership making probate unnecessary. Respondent further states that Phillip Kardasz's trust was fully funded, restated several times, provided no common trust (Article 10) between him and Counter-Defendant (as did hers prior to her secret**

revocation) and all assets were in Phillip's Trust (or thought to be based on the fraudulent misrepresentations of Counter-Defendant), and that assets found to be were mis-titled by Counter-Defendant's fraud as outlined in the Third Amended Counterclaims and Third Party Complaint, Phillip Kardasz's Declaration of Trust Ownership provided the mechanism to move that asset into his trust as was attempted several times in the related DuPage Case No. 20MR923, and always contested by Counter-Defendant. The remaining allegations and last sentence of paragraph 2 are denied. In further answering, Respondent's father Phillip Kardasz always had Respondent as a named co-trustee and her husband Joseph Paterno as his successor trustee up to and including September 2006; Counter-Defendant's undue influence and fraudulent concealment cause Philip Kardasz to change his co-trustee from Respondent to Counter-Defendant's brother Robert Siemers, and from Joseph Paterno to Counter-Defendant Betty Kay [Day] Kardasz's son Steven Day as successor of Phillip Kardasz's Trust until 2015 when Phillip Kardasz restated and amended his trust, retyped in 2018 due to Betty Kay [Day] Kardasz's theft of and tampering of the trusts. Phillip Kardasz reinstated Respondent as a co-trustee with Counter-Defendant to ensure checks and balances that the Counter-Defendant removed by inserting her brother and son. The reinstatement of Respondent as a co-trustee in 2015 caused Counter-Defendant to steal the 2015 Amendments, replacing them with the 2008 restatement and amendments that should have been destroyed according to Slate Law's stated policies. William Slate retired in 2009 when he amended Phillip's and Counter-Defendant's

respective trusts that involved Article 7 in 2011. William Slate/Slate Law Offices refused to produce Phillip Kardasz's file pursuant to a subpoena. No conflict of interest or waiver was ever signed nor dual representation consented to.

3. On September 12, 2017, Phillip and Kay caused to be recorded a quitclaim deed in trust in which they conveyed and quitclaimed a fifty-percent interest in their home located at 723 W. 67th place in Willowbrook ("the house") to Phillip's Trust. Phillip and Kay conveyed the remaining fifty-percent interest in the house in equal one-third shares to Kay's children Steven Day, Michael [sic] Day, and R. Patrick Day. The deed provided Kay with a life estate in the property, which permitted her the use of the property and any rents, revenues, or profits generated by the property for the term of her natural life.

AMENDED ANSWER: Denied that Respondent's father Phillip Kardasz caused the quitclaim deed, executed Aug. 24, 2017, to be recorded or that he conveyed any interest in the house to anyone via the September 12, 2017 quitclaim deed, **dated Aug. 24, 2017**, that purported to give a 50% interest in the **723 67th Place** to Kay and her descendants, **on the condition and if Phillip died first**; Phillip Kardasz did not sign the deed. Admitted that Kay caused the quitclaim deed to be recorded **through her then Attorney Kathryn Clancy**. In further answering, **in the underlying DuPage Case No. 20MR923, the deed, dated Aug. 24, 2017, was submitted for examination** years later in 2021 and determined by a **forensic** handwriting expert that Phillip's signature was forged by Kay. The deed was prepared, notarized and recorded by Kay's attorney, Kathryn Clancy, ~~but the attorney's~~ whose billing records and Oct. 15, 2017 letter to Kay ~~only do not reflect any meeting between the attorney and Phillip~~ **prove up that Phillip Kardasz's signature is a forgery and that Attorney Clancy never met Phillip.**

Attorney Clancy then became a Third Party Defendant in the underlying DuPage Case No. 20MR923 when she executed a false affidavit to help Counter-Defendant secure Phillip Kardasz's trust's 50% interest in 723 67th Place, to be, and was attached to Kay's attorneys' respective motions to dismiss. Attorney Clancy could not produce Phillip Kardasz's driver's license. Further state that Kay's current attorneys in the underlying related DuPage Case No. 20MR923, became named Third Party Defendants with Attorney Clancy, when they too perpetrated a fraud on the court, the Respondent, Phillip Kardasz's Trust and the Kardasz beneficiaries to aid Kay's fraud and forgery of the deed dated Aug. 24, 2024. First Attorney Gary Hollander, who intentionally, fraudulently materially misrepresented Attorney Clancy's false affidavit, (dated April 5, 2022 attached to his August 2022 filing), (later copied by Attorney David Feldman in 2023) to help Counter-Defendant secure Phillip Kardasz's Trust's 50% interest in 723 67th Place; then Complainant Attorney Karen Mills became a third party defendant as the result of her actions including but not limited to her July 14, 2022 submission to the court stating the deed, dated Dec. 15, 2017 is NOT a forgery in order to aid Betty Kay Kardasz's fraudulent conversion of Phillip Kardasz's trust's 50% interest in 723 67th Place. Third Party Defendant Attorney Mills needed the deed dated Dec. 15, 2017 to be valid in order for Kay to still claim Phillip Kardasz's trust's 50% interest for herself and her descendants, several

of whom are Third Party Defendants, including Robert Patrick Day and Steven Day, who signed a deed dated Dec. 15, 2017 and represented that Micheal Day had signed the deed. The deed, dated Aug. 24, 2017, transfers Phillip Kardasz's trust's 50% interest to Counter-Defendant if Phillip Kardasz died first. Phillip died first because Kay, without authority was allowed to sign the AMITA hospice contract on June 29, 2020. Further state: Phillip Kardasz had gone to his dialysis treatment and upon returning home to 723 67th Place was ambushed by the AMITA hospice professionals, arranged by Counter-Defendant with no authority and no power of attorney was operative. Phillip Kardasz had rejected Counter-Defendant's pressure to go off dialysis since Counter-Defendant received notice of hers and her sons' company's \$3 million ERISA pension withdraw liability on March 1, 2017, leading to the hiring of Attorney Clancy (8/24/17 forged deed and 4/5/ false affidavit). For over 1,000 days up to June 29, 2020, Phillip Kardasz had rejected Kay's repeated requests to go off dialysis, and after 180 days of saying no to AMITA hospice's sales pitches, including 3 times in the month of June 2020 (including June 29, 2020). Phillip Kardasz's daughter, the Respondent, present on June 29, 2020, heard Phillip Kardasz reject AMITA hospice and Counter-Defendant's pressure, repeatedly, with expletives. Then without authority, Counter-Defendant was allowed to execute the AMITA Hospice contract in secret on June 29, 2020, or else Phillip Kardasz's and the Respondent's signatures would appear

on the AMITA hospice contract if Phillip Kardasz suddenly changed his mind. Phillip's and Respondent's signatures do not appear, only Counter-Defendant's. Counter-Defendant's forgeries only bear fruit if Phillip Kardasz died first; otherwise the forged deed, dated Aug. 24, 2017 would be fruitless. Counter-Defendant's forgery of the Aug. 24, 2017 deed required Phillip Kardasz to die first in order to secure his Trust's 50% interest in 723 67th Place proving premeditation. Deny any and all remaining allegations. See Respondent's Third Amended Counterclaims and Third Party Complaint, adopted and incorporated here by reference.

4. On or about July 5, 2020, Phillip died. Following Phillip's death, Respondent's relationship with Kay became acrimonious, and included Respondent alleging in court papers she filed in the Circuit Court of DuPage County that Kay had killed Phillip.

AMENDED ANSWER: ~~The first sentence of paragraph 4 is admitted.~~ Admitted that Respondent's relationship with Kay became acrimonious after September 1, 2020 for numerous reasons including but not limited to Kay's **attempt to sell Phillip Kardasz's collection of 140+ weapons, illegally using Dave Ratkovich who had no Federal firearms license on Aug. 1, 2020, the (now 5-year) delay** in the administration of Respondent's father's estate through the present (**proving the motive of Counter-Defendant and her attorneys**), the improper selling/**conversion** of her father's trust property, *including from her childhood* and later discovered apparent **proven** forgeries of Phillip's signature, including on the September 12, 2017 quitclaim deed, dated **Aug. 24, 2017**). Additionally, on June 29, 2020, Kay without authority, and against Phillip Kardasz's stated direction that day, (**and as he stated for**

the 4 years prior), to continue with his life-sustaining dialysis treatments (that he had gone to that morning), executed the hospice contract forcing a fully competent, conscious Phillip Kardasz into hospice and off dialysis which was the proximate cause of Phillip's death. Further state not sure what filings the Complaint is referencing but state that it is Counter-Defendant's Attorney Karen Mills material misrepresentation of documents prepared for litigation that was included in Count III of the Amended Verified Motion for Declaratory Relief that mischaracterized/ misstated the statements contained in the document and further state it is Attorney Karen Mills who first stated that "Kay killed Phillip" (true statement), and that "Kay murdered Phillip", and was done by Attorney Mills to incite and did incite prejudice, which is the same reason it is included here. Notwithstanding that the Administrator's inclusion in the Complaint makes Phillip Kardasz death and surrounding circumstances and the fraud and forgery by including the deed dated Aug. 24, 2017, relevant to this case, including the fraud of the Counter-Defendant, her relations (Third Party Defendant Days and her attorneys' fraud as stated herein and in the Third Amended Counter Claims and Third Party Complaint. Alternatively, if the Administrator is referring to the Third Amend Counterclaims and Third Party Complaint and various filings in the related DuPage Case No 20MR923 by Respondent once she pieced together what Counter-Defendant did and her fraud and forgery, Respondent realized that she had been the target of her stepmother all along proven up by the documents Respondent discovered during the course of litigation. Further admit that the Third Amended Counterclaims and Third Party Complaint, adopted and incorporated here by reference, include statutory Counterclaims against Counter-Defendant Betty Kay [Day] Kardasz for

Illinois Wrongful Death Act, 740 ILCS 180, *et seq.* and the Financial Exploitation of an Elderly Person or a Person with a Disability, 720 ILCS 5/17-56, *et seq.* along with claims for fraudulent misrepresentations, fraudulent concealment, conversion, breach of fiduciary duty. Further state: because Phillip Kardasz death is incorporated in the Complaint, and Counter-Defendant's forging of the 8/24/17 Deed requires Phillip Kardasz to die first in order for Counter-Defendant's forgery to profit, the Counterclaims against Counter-Defendant are relevant, which include counts pursuant to the Illinois Wrongful Death Act, 740 ILCS 180, *et seq.* (Count I) and the Financial Exploitation of an Elderly Person or a Person with a Disability, 720 ILCS 5/17-56, *et seq.* (Count II). In 2017, Counter-Defendant began pressuring Respondent's father Phillip Kardasz to go off his life-sustaining dialysis treatments after Counter-Defendant received a \$3 million ERISA pension withdraw liability for hers and her sons (Steven and Robert Patrick Days') company on March 1, 2017, and hired Attorney Kathryn Clancy, who prepared notarized and recorded the 8/24/17 Deed. (See Third Amended Counterclaims and Third-Party Complaint, adopted and incorporated herein by reference). In Dec. 2019, when Respondent, Counter-Defendant, and Phillip Kardasz were told that Phillip could live another nine (9) years with his regular dialysis treatment, Counter-Defendant (who was 4 years older and had cancer) solicited AMITA St. Thomas Hospice's ("AMITA Hospice", later d/b/a AdventistHealth) help to persuade Phillip to go off his dialysis treatments. No power of attorney has ever been active and therefor Counter-Defendant was without authority. (Relating to the death of Phillip Kardasz, fraud and the 8/24/17 and 12/15/17 Deeds referenced in the Complaint). For 6 months AMITA Hospice approach Phillip Kardasz at the unauthorized solicitation of

Counter-Defendant, which Phillip Kardasz always rejected, with expletives, from Dec. 2019 through and including the June 29, 2020 meeting arranged again by Counter-Defendant, without authority while Phillip Kardasz was at his dialysis treatment. Phillip Kardasz died first because Counter-Defendant, without authority and by no operation of any power of attorney, was allowed to execute the AMITA hospice contract, on June 29, 2020, which Respondent learned when Attorney Karen Mills attached Phillip Kardasz's records from AMITA St. Thomas Hospice that also proved that (a) Phillip Kardasz had repeatedly rejected AMITA Hospice's sales pitches since Dec. 2019, that Phillip Kardasz went to his dialysis treatment on the morning of June 29, 2020 while Counter-Defendant and an AMITA representative (Joanne Donoghue), summoned several other AMITA professionals to ambush Phillip Kardasz upon arriving home; (b) Counter-Defendant had no authority to sign the AMITA hospice contract on June 29, 2020, that Phillip Kardasz was fully competent on June 29, 2020 and stated he was not going off dialysis and did not want AMITA services, in the presence of Respondent and others, and (c) Respondent present at the meeting on June 29, 2020 with her father Phillip Kardasz were able to sign the contract if Phillip Kardasz had changed his mind, but Counter-Defendant's signature is the only one on the hospice contract and (d) If Phillip Kardasz changed his mind, and with his daughter, the Respondent, present on June 29, 2020, logic dictates their signatures would have been secured—but neither signed the June 29, 2020 AMITA Hospice contract, only the Counter-Defendant's signature appears. Deny any and all remaining allegations.

5. On August 3, 2020, Respondent caused to be recorded a quit claim deed in trust pertaining to Phillip's and Kay's house, described in paragraph two, above, with the DuPage County Recorder. Respondent paid the filing fee for the recordation of the deed with check

number 0600, drawn on her law firm bank account maintained at US Bank, and with an account number ending in 6855. The DuPage County Recorder accepted the deed for recordation, and assigned document number R2020-083277 to the deed. The deed listed as grantors Kay's sons Steven Day, Michael [sic] Day, and R. Patrick Day, who were grantees in the September 12, 2017 deed, described in paragraph three, above, and Kay's Trust as grantee.

AMENDED ANSWER: Admitted that on August 3, 2020, less than a month after Phillip's death and her brother Gregory Kardasz dying, Counter-Defendant **came over next door to Respondent's home and while Respondent, family and friends were getting ready to go to see Respondent's dying brother, asked if they could stop at DuPage, with Kay causing a quit claim deed to be recorded by giving Respondent the documents in her control and custody and directing Respondent to record a deed purporting to be the Dec. 15, 2017 deed (paragraph 6) be recorded and file Phillip's 2006 Will under which Respondent is a named personal representative. Respondent does not know if that is the deed she was asked to notarize on Dec. 15, 2017 because she did not review it and accordingly denies it is the deed presented for notarization by Counter-Defendant and her sons Robert Patrick Day and Steven Day on Dec. 15, 2017. Respondent further states that while she remembers filing her father Phillip Kardasz's 2006 Will, she does not remember recording the deed and accordingly denies the same. Respondent believes she does not recall recording any deed on Aug. 3, 2020, because she was dropped at the clerk's office to file Phillip Kardasz's 2006 Will, while the others drove to the recorder's office in the interest of time. The recorded deed, dated Dec. 15, 2017, went back to Counter-Defendant at 723 67th Place, not Paterno Law Offices LLC, and spelled Micheal Day's name wrong as in all Attorney Clancy's documents**

prepared for Counter-Defendant, including her new estate documents that secretly revoked her prior reciprocal Slate Law estate documents, removed Phillip Kardasz as a trustee and as a beneficiary, which all documents were produced to the Administrator. At the time, Respondent and Kay still maintained a good relationship based on Kay's relationship with Kay as her step-mother for over 30 years with Respondent taking Counter-Defendant to all doctor's appointments, surgeries, running errands, etc. (not her sons) and Respondent loved and trusted Kay (Counter-Defendant) as did Respondent's father Phillip Kardasz. Additionally, Kay's (Counter-Defendant's) sons, Steven Day, Micheal Day, and Robert Patrick Day ("Patrick"), are not beneficiaries under Phillip's Trust nor to Phillip's 50% interest in 723 67th Place. Denied that Respondent recorded the deed dated Dec. 15, 2017; deny that is the deed Respondent notarized on Dec. 15, 2017. Denied that Phillip Kardasz signed the deed or that his 50% interest was not in his Trust. Further denied each and every remaining allegation and demand that the Administrator, through the Complainant Attorney (Third Party Defendant Karen Mills, who represents Counter-Defendant and her relations including Third Party Defendants Robert Patrick Day, Steven Day, Timothy Day (Micheal Day's son) and Shannon Day Quinn), produce the deed dated Dec. 15, 2017 that was returned to Counter-Defendant so that it can be forensically examined. Further state Attorney Mills represents Timothy Day in the multi-million dollar lawsuits relating to the deed, dated Dec. 15, 2017, which is outlined in the underlying DuPage Case No. 20MR923 in the Third Amended Counterclaims and Third Party Complaint, adopted and

incorporated herein, in which Tim Day is fraudulently misrepresenting and concealing ownership in the two companies involved. Deny any and all remaining allegations.

6. Respondent recorded the quitclaim deed in trust with the DuPage County Recorder on August 3, 2020, the deed purported to be executed nearly three years earlier, on December 15, 2017. The deed stated that Respondent's law office prepared the deed, and Respondent, as notary, notarized the signatures of the grantors on the deed, who were Kay's sons R. Patrick Day, Steven Day, and Michael [sic] Day, and the signature of Kay, whose trust was the grantee on the deed. Respondent's signature, the date of December 15, 2017, and Respondent's notary stamp appeared immediately below a paragraph on the last page of the deed that stated as follows:

I, the undersigned, a Notary Public in and for said County, in the state aforesaid state, do hereby certify that Steven A. Day, R. Patrick Day, and Michael [sic] Day, sons of Betty K. Kardasz are personally known to me to be the same person whose name is subscribed in the forgoing instrument, appeared before me this day in person and acknowledged that each individual signed said instrument as his free and voluntary act for the uses and purposes therein set further.

AMENDED ANSWER: Admitted that Counter-Defendant Kay caused a deed dated Dec. 15, 2017 to be recorded but deny that Respondent recorded the deed or that it is the deed that Respondent notarized on Dec. 15, 2017, including the language referenced above, and as stated in her answer to paragraph 5, incorporated herein by reference, but admit the deed was recorded at the direction of Counter-Defendant Kay. As to the language of the deed, the document serves as the best evidence thereof, but deny that Respondent read the deed, or that the recorded deed is the same as the deed Respondent notarized on Dec. 15, 2017; deny Respondent would have drafted notary language that would have included language "sons of Betty K. Kardasz are personally known to me to be the same person whose name is subscribed in the forgoing instrument, appeared before me this day in person and acknowledged that each individual signed said instrument as his free and

voluntary act for the uses and purposes therein set further...”; and that Respondent or Paterno Law Offices, LLC prepared the December 15, 2017 deed, with the deed being returned to **Counter-Defendant Kay at 723 67th Place**, not Paterno Law Offices, LLC **and that Micheal Day’s name is misspelled in the deed as it is in all of the documents prepared for Counter-Defendant by her then Attorney Kathryn Clancy, a named Third Party Defendant in the underlying DuPage Case No. 20MR923 for her fraud relating to the 8/24/17 Deed to help Counter-Defendant secure Phillip Kardasz’s Trust’s 50% interest by signing a false affidavit as detailed in the Third Amended Counterclaims and Third Party Complaint, adopted and incorporated herein. Demand made through the Administrator that Counter-Defendant, represented by Complainant (Third Party Defendant) Attorney Mills, who the recorded deed, dated 12/15/17, was returned to, produce the deed for forensic examination but the same was refused.** In further answering, on December 15, 2017, **Counter-Defendant Kay and her sons, (Third Party Defendants Steven and Robert Patrick Day), brought a the already prepared deed to Respondent’s house next door and requested that she notarize it. Micheal’s purported signature already appeared on the deed, and Kay, Steven and Patrick represented to Respondent that they had seen Micheal sign the deed before he died. Respondent reviewed Micheal’s signature only that Respondent was familiar with, and Steven and Patrick signed the deed in Respondent’s presence before notarizing. At the time, Respondent trusted the representations of Counter-Defendant Kay, Steven, and Robert Patrick Day that Micheal Day had signed the deed based on the close and familial relationship between Respondent, Kay and her step-brothers for over 30 years and that the signature looked like Micheal Day’s which -** ~~Additionally,~~ Respondent was familiar with and Micheal’s signature and, at the time, it appeared

to Respondent to be Micheal's signature since she had notarized it before when she witnessed him sign. **Had Respondent known about the deed dated, Aug. 24, 2017, that is proven forged by Counter-Defendant, proven up by Attorney Clancy's billing and letter dated Oct. 5, 2017, Respondent would have known Counter-Defendant and her sons, Steven and Robert Patrick Day were lying and would not have notarized the deed. Respondent filed a contempt petition against Kay's and the Days' Attorneys Karen Mills and Gary Hollander for their fraud on the court, Phillip Kardasz's trust and the Kardasz's beneficiaries concerning the deed dated Dec. 15, 2017 and the Aug. 24, 2017 deeds, with them becoming Third Party Defendants in the related DuPage Case 20MR923.** The quit claim deed, dated Dec. 15, 2017, benefitted **Counter-Defendant Kay and her descendant children (the Days) – not Respondent as found by the Administrator's expert–** as it changed Kay's 50% interest in 723 67th Place from Kay's three sons back to Kay's new 2017 **same-named trust that was prepared by Attorney Kathryn Clancy that disinherited Phillip Kardasz and removed him as a trustee. The deed dated Aug. 24, 2017, fraudulently transferred Phillip Kardasz's trust's 50% interest in 723 67th Place to Counter-Defendant and the Days if Phillip Kardasz died first. Phillip Kardasz died first because Counter-Defendant wrongfully and with premeditation killed him by forcing him off dialysis against his will and stated direction on June 29, 2020, as stated in the Third Amended Counter-Claims and Third Party Complaint, adopted and incorporated herein.** By that time, Micheal's son, Third Party Defendant Tim Day, had potential liability in relation to a multi-million dollar personal injury lawsuit filed days before involving **Timothy Day's negligent management of an employee** who caused a car accident on November 15, 2017, that killed 4 people. **Counter-Defendant Kay and**

her sons, who had moved assets to hide from a \$3 million ERISA pension withdraw liability, then had an interest in protecting their assets from the pending judgment against Tim Day. Timothy Day fraudulently misrepresented his ownership in the companies involved (which commonly knowledge in the family) and is represented by Attorney Karen Mills in those cases in LaSalle and Cook Counties.

Further state Counter-Defendant's attorneys fraud on the court and Phillip Kardasz's Trust, and the Kardasz beneficiaries relating to the 12/15/17 and 8/24/17 Deeds are as follows as stated in the Third Amended Counterclaims and Third Party Complaint: Attorneys Karen Mills, Gary Hollander and Kathryn Clancy became Third Party Defendants for aiding and abetting Counter-Defendant's fraud by affirmatively acting and engaging in their own fraud during litigation to help Counter-Defendant secure Phillip Kardasz's Trust's 50% interest in 723 67th Place that fraudulently transferred when Phillip Kardasz died first via the 8/24/17 Deed. The fraud of the attorneys is as follows:

(A) Attorney Kathryn Clancy's perjured affidavit (dated April 5, 2022) concerning the 8/24/17 Deed, prepared for Counter-Defendant's attorneys and attached to Counter-Defendant's separate motions in Aug. 2022, and then in 2023 (by Counter-Defendant's attorney David Feldman) to rebut the forensic examiner's finding that Counter-Defendant forged Phillip Kardasz's signature on the 8/24/17 deed, prepared, notarized and recorded by Attorney Clancy. Phillip Kardasz's signature is proven forged by Counter-Defendant through forensic examination and proven up by Attorney Clancy's billing and 10/5/17 letter to Counter-Defendant only, stating it was nice working with Counter-Defendant and her sons Pat Day and Steven Day (signed a 12/15/17 Deed). Attorney Clancy did not have

Phillip Kardasz's driver's license and did not know Respondent had discovered her billing and 10/5/17 letter to the Counter-Defendant stating it was nice working with the Counter-Defendant and her sons (Robert Patrick Day and Steven Day, 8/24/17 Deed; signed a 12/15/17 Deed). Attorney Clancy's fraud on the court, Phillip Kardasz's Trust, the Respondent, and the Kardasz beneficiaries during litigation resulted in Ms. Clancy becoming a Third-Party Defendant;

(B) Attorney Gary Hollander became a named Third-Party Defendant for his intentional/fraudulent material misrepresentations of Attorney Clancy's Affidavit (dated 4/5/22), to help Counter-Defendant secure Phillip Kardasz's Trust's 50% interest. Attorney Clancy's false statements were not credible—that she went to 723 67th Place to notarize the 8/24/17 Deed (omitting she prepared and recorded the forged 8/24/17 deed) and forgetting that two notaries lived next door (Respondent and Respondent's husband Joseph Paterno) to Phillip Kardasz, so Attorney Hollander changed Ms. Clancy's affidavit in his motion with such detail it is an impossibility it is a mistake. Further, Phillip Kardasz would have called his daughter, the Respondent, from next door before signing any deed, especially one that conveyed his 50% interest to the Counter-Defendant. Attorney Clancy would have had to advise Phillip Kardasz what the effect in signing was or let him know she could not advise because she represented Counter-Defendant (and her sons (Steven and Robert Patrick Day) (12/15/17 Deed), which would have also resulted in Phillip summoning his daughter from next door;

(C) Counter-Defendant's Attorney David Feldman would have also been named as a third-party defendant when he copied the intentional and or fraudulent material

misrepresentations of Attorney Gary Hollander in his motion later filed in 2023 had the Third Amended Complaint not already been filed.

(D) Attorney Karen Mills' submission to the court dated, July 14, 2022, falsely states the 12/15/17 deed is not a forgery when Respondent proved that the prior 8/24/17 Deed is a forgery. Attorney Mills needed the 12/15/17 Deed to now be valid in order for Counter-Defendant and the Days to secure Phillip Kardasz's Trust's 50% interest in 723 67th Place. Respondent immediately filed a contempt petition against Attorneys Mills and Hollander for his actions concerning the 8/24/17 Deed, as outlined in the Counterclaims and Third-Party Complaint.

7. Respondent's statement in the deed she recorded on August 3, 2020, described in paragraph six, above, that R. Patrick Day, Steven Day, and Michael Day appeared before her to sign the deed as witnesses, was false. Michael Day could not have been present to execute the deed on December 15, 2017 because he died on November 13, 2015, over 21 months prior to the date Respondent falsely certified that Michael Day appeared before her to execute the deed.

AMENDED ANSWER: Admitted that the notary language on the deed that Counter-Defendant Kay asked her to be recorded on August 3, 2020 states that was incorrect in that Micheal Day appeared before her in person but deny that is the deed presented for notarization on Dec. 15, 2017, as stated above in paragraph 6 above, adopted and incorporated herein by reference. Further state that Respondent has no way of knowing whether that deed recorded on Aug. 3, 2020 is the deed she notarized on Dec. 15, 2017, and accordingly denies the same and denies she prepared a deed that would include notary language "sons of Betty K. Kardasz are personally known to me to be the same person whose name is subscribed in the forgoing instrument, appeared before me this day in person and acknowledged that each individual signed said instrument as his free and

voluntary act for the uses and purposes therein set further...” Denied that that Respondent prepared or read the deed or that she “falsely certified” that Micheal appeared before her. Additionally, Respondent was only asked to notarize the signatures, witnessing Steven and Patrick sign, and erroneously believed she could notarize the third (Micheal) based on representations by her step-mother **Counter-Defendant** and **Third Party Defendant** step-brothers (Kay, Steven and **Robert** Patrick), and her familiarity with Micheal **Day**’s signature. Respondent made a mistake, was not dishonest and did not have an intent to defraud. **The fraud is Counter-Defendant Kay’s as stated in the Third Amended Counterclaims and Third Party Complaint against Kay, Steven Day, Robert Patrick Day, Timothy Day, Shannon Day Quinn and Third Party Defendants Attorneys Karen Mills, Gary Hollander and Kathryn Clancy, and later David Feldman who represent Counter-Defendant Kay and the Days in the underlying DuPage Case No. 20MR923.**

8. Respondent knew her statement described in paragraph six, above, was false because she personally notarized the purported signatures of the Days when Michael Day was not present before her. Respondent further knew when she recorded the deed on August 3, 2020 that the deed contained a false statement of fact, namely, that Michael Day had appeared before her to execute the deed, when in fact he did not.

AMENDED ANSWER: Respondent’s amended answers to paragraphs 5 through 7 are adopted and incorporated herein by reference. Respondent is without knowledge to know whether the deed recorded on Aug. 3, 2020 is the deed she was asked to notarize on Dec. 15, 2017, and accordingly denies the same and demands the Administrator produce the same through Complainant Attorney Karen Mills, who represents the Counter-Defendant in the related DuPage Case No. 20MR923, for forensic examination and further denies that she would ever draft the language that is in the recorded deed as part of a

notary statement, that “sons of Betty K. Kardasz are personally known to me to be the same person whose name is subscribed in the forgoing instrument, appeared before me this day in person and acknowledged that each individual signed said instrument as his free and voluntary act for the uses and purposes therein set further...”. Admitted that when Respondent notarized the signature of Micheal **Day** at the direction of **Counter-Defendant** Kay and based on the representations of her step-mother and brothers, **Counter-Defendant** Kay, **Robert Patrick Day**, and Steven **Day**, that Micheal **Day** had signed the **pre-prepared** deed **they brought next door to Respondent’s home**, the notary language, which Respondent did not draft, **prepare**, nor read, incorrectly stated that Micheal Day had appeared before her the notary, but **denies that the deed recorded on Aug. 3, 2020 is the deed presented on Dec. 15, 2017, as stated above**. The remaining allegations of paragraph 8 are denied.

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

- a. making a false statement of material fact or law to a third person, by conduct including recording the December 15, 2017 deed with the DuPage County Recorder which falsely stated that Michael [sic] Day had executed the December 15, 2017 deed, in violation of Rule 4.1(a) of the Illinois Rules of Professional Conduct (2010); and
- b. engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including falsely certifying that Michael [sic] Day executed the deed on December 15, 2017, and by recording that deed with the DuPage County Recorder on August 3, 2020 knowing the deed to contain the false statement that Michael [sic] Day appeared before Respondent to execute the deed.

ANSWER: As paragraph 9 alleges conclusions of law, no answer is required. To the extent that any answer is deemed required, the allegations of Paragraph 9 including subparagraphs a & b are denied. In further answering, Respondent is remorseful and regrets that

she relied on the representations stated by **Counter-Defendant Kay, Robert Patrick,** and Steven Day, her stepfamily, in complying with **Counter-Defendant Kay's** request to notarize the a deed on Dec. 15, 2017 and at **Counter-Defendant Kay's** direction **to go to DuPage to** record the December 15, 2017 deed and file Phillip Kardasz's Will on August 3, 2020 **but states that Respondent is without knowledge to know if the deed recorded on Aug. 3, 2020, is in fact the deed she notarized on Dec. 15, 2017 that Counter-Defendant produced on Aug. 3, 2020 with Respondent's father Phillip Kardasz's 2006 Will, and accordingly denies the same. Respondent has consistently stated that while remembering she filled Phillip Kardasz's 2006 Will, she does not recall recording any deed on Aug. 3, 2020 that Counter-Defendant requested/directed be done on the way out to Respondent's dying brother's and accordingly denies the same as stated in her Amended Answer to paragraph 5, adopted and incorporated herein by reference.** Respondent is no longer a notary and is no longer practicing law except in the related ~~relation to the current lawsuit in~~ DuPage Case No. 20MR923 representing herself, her father Phillip Kardasz's Trust, and the Kardasz beneficiaries, now in the fifth year of litigation with Counter-Defendant obstructing any attempt to administer Phillip Kardasz' Trust, the only motive in this case supported by the uncovered fraud during litigation. ~~involving the administration of her father Phillip Kardasz's trust.~~

AMENDED AFFIRMATIVE DEFENSE

AFFIRMATIVE DEFENSE #1 - No Dishonesty; No Intent to Defraud

Respondent did not act with any dishonest or fraudulent intent, but instead mistakenly notarized the document based on the representations of her stepmother Counter-Defendant Betty Kay Day Kardasz and her stepbrothers, Third Party Defendants Steven Day and Robert Patrick Day that their brother/son Micheal Day signed the deed presented by Kay and her sons on Dec. 15, 2017 when they came next door to the Respondents and asked if she could notarize the deed. Kay, Steven and Pat fraudulently withheld the \$3 million ERISA pension withdraw liability, that leading to the hiring of Attorney Kathryn Clancy to move and conceal assets from the Union and the federal government as stated in a Sept. 1, 2020 recording between Respondent and Counter-Defendant that Kay had hired Attorney Kathryn Clancy who redid Counter-Defendant's estate documents, secretly disinheritng Respondent's father Phillip Kardasz and removing him as a trustee and revoking her prior same-named Betty K. Kardasz Trust along with forging the deeds prepared, notarized and recorded by Attorney Kathryn Clancy, including the deed referenced in the Complaint, dated Aug. 24, 2017. Attorney Clancy then perjured herself when she prepared her false affidavit, dated April 5, 2024, to help Counter-Defendant secure Phillip Kardaaz's Trust's 50% interest in 723 67th Place, followed by Counter-Defendant's current attorney's fraud as outlined below and in the related DuPage Case No. 20MR923's Third amended Counterclaims and Third Party Complaint, and on the belief that she could rely on their representations of her family, and based on her familiarity with Micheal Day's signature.

Further state that Respondent is without knowledge to know if the deed presented on Aug. 3, 2020 is the deed she was asked to notarize on Dec. 15, 2017 because Counter-Defendant took and kept custody of the deed and left Respondent's home. The deed presented on Aug. 3, 2020, misspells Micheal Day's name as in all Attorney Clancy's estate documents and forged deeds prepared for Counter-Defendant including the 8/24/17 Deed referenced in the Complaint. Respondent further states she would never draft the notary language that is contained in the deed recorded on Aug. 3, 2020, referencing "Betty K. Kardasz's sons" and naming them all together, and never referred to "Kay" as "Betty K. Kardasz", which is how she is referred to in Attorney Clancy's documents and the title of her trust. Neither Phillip Kardasz nor his trust were involved in Counter-Defendant's moving of assets due to the \$3 million ERISA pension withdraw liability which Counter-Defendant and her sons (Steven and Robert Patrick Day concealed from March 1, 2017 through being served with the lawsuit on June 1, 2020, 28 days before Counter-Defendant executed the AMITA Hospice contract, intending to and was the proximate cause of Phillip Kardasz's death in order for Counter-Defendant to profit by her fraud and forgery, detailed in the Third Amended Counterclaims and Third Party Complaint (adopted and incorporated herein by reference) for claims made under the Illinois Wrongful Death Act, 740 ILCS 180, *et seq.* and the Financial Exploitation of an Elderly Person or a Person with a Disability, 720 ILCS 5/17-56, *et seq.*, and counts for and also claims of fraudulent misrepresentation, fraudulent concealment, conversion, and breach of fiduciary duty/accounting.

AFFIRMATIVE DEFENSE #2 - FRAUD

An investigatory agency has the responsibility to investigate where fraud is discovered in the course of, regardless of whether a request for investigation is filed. The fraud of Counter-

Defendant and her Third Party Defendant attorneys is outlined in the Third Amended Counterclaims and Third Party Complaint, adopted and incorporated herein by reference, summarized as follows regarding the fraud of Counter Defendant Betty Kay {Day] Kardasz and her attorneys (current) Complainant Attorney Third Party Defendant Karen Mills, Attorney Third Party Defendant Gary Hollander and Attorney David Feldman (copying Gary Hollander's fraud in his 2023 motion but the Third Amended Counterclaims and Third Party Complaint were already filed) and Counter-Defendant's former attorney Attorney Third Party Defendant Kathryn Clancy, relating to the allegations contained in the Complaint that references the forged deed dated Aug. 24, 2024, recorded Sept. 17, 2017 ("8/24/17 Deed") and a deed dated Dec. 15, 2017, recorded Aug. 3, 2020 ("12/15/17 Deed") and paragraph 4 of the Complaint citing Phillip Kardasz's death makes the circumstances of his death relevant and is directly related to and the reason for Counter-Defendant's fraud concerning of the 12/15/17 Deed and Counter-Defendant's forgery of the 8/24/17 Deed.

1. Phillip Kardasz death is incorporated in the Complaint, and Counter-Defendant's forging of the 8/24/17 Deed requires Phillip Kardasz to die first in order for Counter-Defendant's forgery to profit, the Counterclaims against Counter-Defendant are relevant, which include counts pursuant to the Illinois Wrongful Death Act, 740 ILCS 180, *et seq.* (Count I) and the Financial Exploitation of an Elderly Person or a Person with a Disability, 720 ILCS 5/17-56, *et seq.* (Count II) and also claims of fraudulent misrepresentation, fraudulent concealment, conversion, and breach of fiduciary duty/accounting.

2. The facts relating to the hiring of Attorney Kathryn Clancy: In 2017, Counter-Defendant began pressuring Respondent's father Phillip Kardasz to go off his life-sustaining

dialysis treatments after Counter-Defendant received a \$3 million ERISA pension withdraw liability for hers and her sons (Steven and Robert Patrick Days') company on March 1, 2017, and hired Attorney Kathryn Clancy, who prepared notarized and recorded the 8/24/17 Deed. (See Third Amended Counterclaims and Third-Party Complaint, adopted and incorporated herein by reference).

3. Circumstances surrounding Phillip Kardasz's death: In Dec. 2019, when Respondent, Counter-Defendant, and Phillip Kardasz were told that Phillip could live another nine (9) years with his regular dialysis treatment, Counter-Defendant (who was 4 years older and had cancer) solicited AMITA St. Thomas Hospice's ("AMITA Hospice", later d/b/a AdventistHealth) help to persuade Phillip to go off his dialysis treatments. No power of attorney has ever been active and therefor Counter-Defendant was without authority. (Relating to the death of Phillip Kardasz, fraud and the 8/24/17 and 12/15/17 Deeds referenced in the Complaint).

- a. For 6 months AMITA Hospice approach Phillip Kardasz at the unauthorized solicitation of Counter-Defendant, which Phillip Kardasz always rejected, with expletives, from Dec. 2019 through and including the June 29, 2020 meeting arranged again by Counter-Defendant, without authority while Phillip Kardasz was at his dialysis treatment.
- b. Phillip Kardasz died first because Counter-Defendant, without authority and by no operation of any power of attorney, was allowed to execute the AMITA hospice contract, on June 29, 2020, which Respondent learned when Attorney Karen Mills

attached Phillip Kardasz's records from AMITA St. Thomas Hospice that also proved that:

- i. Phillip Kardasz had repeatedly rejected AMITA Hospice's sales pitches since Dec. 2019, that Phillip Kardasz went to his dialysis treatment on the morning of June 29, 2020 while Counter-Defendant and an AMITA representative (Joanne Donoghue), summoned several other AMITA professionals to ambush Phillip Kardasz upon arriving home;
- ii. Counter-Defendant had no authority to sign the AMITA hospice contract on June 29, 2020, that Phillip Kardasz was fully competent on June 29, 2020 and stated he was not going off dialysis and did not want AMITA services, in the presence of Respondent and others, and
- iii. Respondent present at the meeting on June 29, 2020 with her father Phillip Kardasz were able to sign the contract if Phillip Kardasz had changed his mind, but Counter-Defendant's signature is the only one on the hospice contract.
- iv. If Phillip Kardasz changed his mind, and with his daughter, the Respondent, present on June 29, 2020, logic dictates their signatures would have been secured—but neither signed the June 29, 2020 AMITA Hospice contract, only the Counter-Defendant's signature appears.

4. Fraud that occurred during litigation relating to the 8/24/17 and 12/15/17 Deeds referenced in the Complaint causing Counter-Defendant's attorneys Attorneys Karen Mills (Complainant), Gary Hollander and Kathryn Clancy to be named as Third Party Defendants for

aiding and abetting Counter-Defendant's fraud by affirmatively acting and engaging in their own fraud during litigation to help Counter-Defendant secure Phillip Kardasz's Trust's 50% interest in 723 67th Place that fraudulently transferred when Phillip Kardasz died first via the 8/24/17 Deed as stated in the related DuPage Case No. 20MR923's Third Amended Counterclaims and Third Party Complaint adopted and incorporated herein by reference, summarized as follows:

- a. Attorney Clancy's perjured affidavit (dated April 5, 2022) concerning the 8/24/17 Deed, prepared for Counter-Defendant's attorneys and attached to Counter-Defendant's separate motions in Aug. 2022 (by Gary Hollander), and then in 2023 (by Counter-Defendant's attorney David Feldman) to rebut the forensic examiner's finding that Counter-Defendant forged Phillip Kardasz's signature on the 8/24/17 deed, prepared, notarized and recorded by Attorney Clancy. Phillip Kardasz's signature is proven forged by Counter-Defendant through forensic examination and proven up by Attorney Clancy's billing and 10/5/17 letter to Counter-Defendant only, stating it was "nice working with [Counter-Defendant] and her sons" Robert Patrick Day and Steven Day (who signed a 12/15/17 Deed). Attorney Clancy did not have Phillip Kardasz's driver's license and did not know Respondent had discovered her billing and 10/5/17 letter to the Counter-Defendant. Attorney Clancy's fraud on the court, Phillip Kardasz's Trust, the Respondent, and the Kardasz beneficiaries during litigation resulted in Ms. Clancy becoming a Third-Party Defendant.
- b. Attorney Hollander became a named Third-Party Defendant for his intentional/fraudulent material misrepresentations of Attorney Clancy's Affidavit (dated 4/5/22), to help Counter-Defendant secure Phillip Kardasz's Trust's 50% interest. Attorney Clancy's

false statements were not credible—that she went to 723 67th Place to notarize the 8/24/17 Deed (omitting she prepared and recorded the forged 8/24/17 deed) and forgetting that two notaries lived next door (Respondent and Respondent’s husband Joseph Paterno) to Phillip Kardasz, so Attorney Hollander changed Ms. Clancy’s affidavit in his motion with such detail it is an impossibility it is a mistake. Further, Phillip Kardasz would have called his daughter, the Respondent, from next door before signing any deed, especially one that conveyed his 50% interest to the Counter-Defendant. Attorney Clancy would have had to tell Phillip Kardasz what the effect in signing was or let him know she could not advise because she represented Counter-Defendant (and her sons (Steven and Robert Patrick Day) (12/15/17 Deed), which would have also resulted in Phillip summoning his daughter from next door.

- c. Counter-Defendant’s Attorney David Feldman would have also been named as a third-party defendant when he copied the intentional and or fraudulent material misrepresentations of Attorney Gary Hollander in his motion later filed in 2023 had the Third Amended Complaint not already been filed.
- d. Attorney Karen Mills’ submission to the court dated, July 14, 2022, falsely states the 12/15/17 deed is not a forgery when Respondent proves that the prior 8/24/17 Deed is a forgery. Attorney Mills needed the 12/15/17 Deed to now be valid in order for Counter-Defendant and the Days to secure Phillip Kardasz’s Trust’s 50% interest in 723 67th Place. Respondent immediately filed a contempt petition against Attorneys Mills and Hollander for his actions concerning the 8/24/17 Deed, as outlined in the Counterclaims and Third-Party Complaint.

5. Counter-Defendant Betty Kay [Day] Kardasz's fraud and premeditated wrongful actions, intending to cause and did and was the proximate cause of Phillip Kardasz death on July 5, 2020, as stated in the Third Amended Counterclaims and Third Party Complaint as follows:

a. In 2017, after receiving the ERISA pension liability letter (Ex. S)², Counter-Defendant (Steven and Robert Patrick Day) hired Attorney Kathryn Clancy to assist in the moving of assets to avoid the pension liability. In addition Attorney Clancy prepared, executed, and recorded two forged Deeds, including the deed dated Aug. 24, 2017, referenced in the Complaint which transferred Phillip Kardasz's Trust's 50% interest in 723 67th Place to Counter-Defendant IF Phillip died first. (Ex. U, W).

b. Upon gathering specimens for an expert analysis of Phillip's signature, it was discovered that Kay's signature can be seen in Phillip's signature on the two 2017 Deeds, including the 8/24/17 deed, which was then submitted for examination. The examiner conclusively found that Counter-Defendant forged Phillip's signature on the Quitclaim Deed in Trust, dated Aug. 24, 2017 and recorded on Sept. 12, 2017 as Doc. #R2017-093780 ("8/24/17 Deed").

c. On Dec. 15, 2017, Counter-Defendant, Steven Day, and Robert Patrick Day came to Respondent's home to have her notarize a deed already prepared concerning 723 67th Place. Counter-Defendant, with the help of her sons concealed information about their intent, meeting with Attorney Clancy and that Clancy had prepared, notarized and recorded the forged 2017 Deeds, including the 8/24/17 Deed that made it impossible that Micheal Day had signed the deed, and they fraudulently misrepresented Micheal Day had signed the deed.

d. The Third Amended Counterclaims and Third Party Complaint states Counter-Defendant's fraudulent misrepresentations and fraudulent concealment all done to ensure that she take all assets going to motive in this case.

e. Counter-Defendant's intentional, premeditated wrongful actions to cause and was the proximate cause of Phillip Kardasz's death is also the motive behind Counter-Defendant and her sons approaching Respondent to notarize a deed, that Counter-Defendant took custody of and then produced a document purporting to be the deed dated Dec. 15, 2017, occurring after consulting with attorneys after Phillip Kardasz' death on July 5, 2020 and presenting on August 3, 2020 after Respondent raised issue with her attempt to sell Phillip Kardasz assault weapons and ammunition illegally.

f. Counter-Defendant perjured herself in the related DuPage Case No. 20MR923 among other dishonest actions proven through photographic evidence, objective documents and an authenticated recording.

AFFIRMATIVE DEFENSE #3 - DISPARATE TREATMENT/DISCIPLINE

The fraud perpetrated by Counter-Defendant's attorneys Karen Mills, Gary Hollander, Katherine Clancy (and later David Feldman) are directly related to the Complaint in this case and in the related DuPage Case No. 20MR923. Respondent's requests for the related discipline cases was denied citing Rule 766 which does not apply as this is a matter of public record and in the interest of justice. In addition, if the Administrator meets her burden that the Respondent acted with an intent to defraud or was dishonest as charged in the Complaint, then the discipline meted out must take into consideration that the attorneys in this and the related case did act with the intent to defraud and were dishonest, not only against Phillip Kardasz's Trust, the Kardasz

beneficiaries and the Respondent, but the courts, and received no discipline. Such brings the courts and the agency into disrepute where one attorney's mistake calculated by the Counter-Defendant to prevent the administration of the Respondent's father Phillip Kardasz's Trust with Counter-Defendant and her relations taking all assets for themselves, including those that predate Counter-Defendant's marriage to Phillip Kardasz, and by admission of the Administrator's own expert, the Respondent gained nothing by the 12/15/17 deed, and has been held up in the DuPage court system now into the fifth year, depleting hers and her husbands life savings, children's education accounts that far exceed any inheritance her children would have received standing in her shoes as delegated years prior, due to the calculated fraud and forgery of Counter-Defendant and her premeditated actions of wrongfully causing the death of Phillip Kardasz when she was told he could live another 9 years in Dec. 2019 causing her to solicit AMITA Hospice to help her force Phillip Kardasz off his dialysis treatment and into hospice so Counter-Defendant could profit by her fraud, as stated in Affirmative Defense #2, adopted and incorporated herein by reference.

WHEREFORE, Respondent Katherine Kardasz Paterno respectfully requests that the Panel Chair grant her leave to file her Amended Answer and Amended Affirmative Defenses and that the Panel dismiss the Complaint with prejudice and for any other relief it deems just.

Respectfully Submitted

/s/Katherine A. Kardasz Paterno
Respondent (#6256503)

Paterno Law Office LLC
7420 County Line Road
Burr Ridge, IL 60527
630 999-3900
attorneypaterno@yahoo.com