

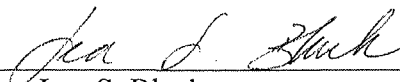
BEFORE THE HEARING BOARD  
OF THE  
ILLINOIS ATTORNEY REGISTRATION  
AND  
DISCIPLINARY COMMISSION

In the Matter of: )  
)  
KENNETH KARL DITKOWSKY, )  
) Commission No. 2012PR00014  
Attorney-Respondent, )  
)  
No. 642754. )

NOTICE OF FILING

✓ TO: Kenneth Karl Ditkowsky  
Attorney-Respondent  
5940 West Touhy Avenue, Suite 230  
Niles, IL 60714

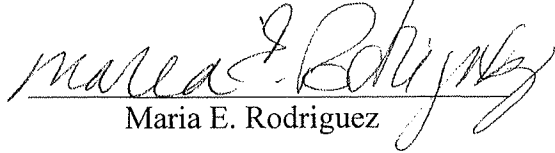
PLEASE TAKE NOTICE that on July 23, 2012, I will file the Administrator's MOTION TO BAR GLORIA SYKES FROM BEING CALLED AS WITNESS AT HEARING, a copy of which is attached, by causing the original and four copies to be delivered to the Clerk of the Attorney Registration and Disciplinary Commission in Chicago, Illinois.

  
\_\_\_\_\_  
Lea S. Black

Lea S. Black  
Wendy J. Muchman  
Counsel for the Administrator  
One Prudential Plaza  
130 East Randolph Drive, Suite 1500  
Chicago, IL 60601  
Telephone: (312) 565-2600

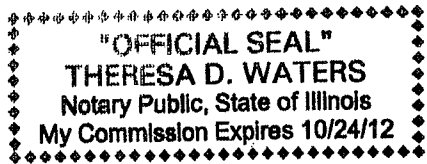
**PROOF OF SERVICE**

I, Maria E. Rodriguez, on oath state that I served a copy of a Notice of Filing, and Administrator's MOTION TO GLORIA SYKES FROM BEING CALLED AS WITNESS AT HEARING, on the individual at the address shown on the reverse side by regular mail, proper postage prepaid, by causing the same to be deposited in the U.S. Mailbox located at 130 East Randolph, Chicago, Illinois, 60601 on July 23, 2012 on or before 5:00 p.m.

  
Maria E. Rodriguez

Subscribed and sworn to  
before me on this 23<sup>rd</sup> day  
of July, 2012.

  
NOTARY PUBLIC



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

In the Matter of: )  
)  
KENNETH KARL DITKOWSKY, )  
) Commission No. 2012PR00014  
Attorney-Respondent, )  
)  
No. 642754. )

MOTION TO BAR GLORIA SYKES FROM BEING CALLED  
AS WITNESS AT HEARING

Jerome Larkin, Administrator of the Attorney Registration and Disciplinary Commission, by his attorneys, Lea S. Black and Wendy J. Muchman, pursuant to Supreme Court Rules 253 and 275, moves that the Hearing Board enter an order barring Respondent from presenting Gloria Sykes as witness at hearing in this matter. In support, the Administrator states:

1. On April 19, 2012, Respondent filed his disclosure of names of potential witnesses pursuant to Commission Rule 253 listing Gloria Sykes as one of his witnesses.
2. By way of letters dated May 7, 2012, June 5, 2012, and June 15, 2012, counsel for the Administrator sought dates from Respondent that were mutually convenient to him and the two witnesses he stated he would be calling at hearing, Gloria Sykes and Scott Evans, to appear for depositions.
3. On June 18, 2012, Respondent sent counsel for the Administrator a letter stating that he would prefer the dates July 2 or July 5, 2012. On June 18, 2012, Gloria Sykes also sent Counsel for the Administrator a letter stating that she was aware that her deposition would be scheduled for July 2 or July 5, 2012, and she did not state that she had a conflict with either date.

4. Based upon the letters described in paragraph 3, above, Counsel for the Administrator filed a notice of deposition on June 26, 2012 for Gloria Sykes to appear for her deposition on July 5, 2012 at 10:00 a.m. and assigned the subpoena compelling her appearance to an investigator to be personally served upon her. On June 27, 2012, Ms. Sykes sent Counsel for the Administrator a letter stating that she was aware that her deposition had been scheduled but that she had not yet received the subpoena. After arranging a date and time to be served with Senior Investigator Jack Kelly, Ms. Sykes was personally served with the subpoena on June 29, 2012.

5. Later that day, counsel for the Administrator received a phone call from Ms. Sykes, who asked “what kind of idiot schedules a deposition for the day after the Fourth of July?” Counsel for the Administrator reminded Ms. Sykes that she had sent a letter regarding her knowledge that her deposition would be on July 2 or July 5, to which Ms. Sykes replied that her plans had since changed, and that she would be going out of town for the holiday. Counsel for the Administrator said that she would continue the subpoena compelling her appearance if Ms. Sykes provided documentation of her travel plans; however, Ms. Sykes refused to provide proof of her plans. Ms. Sykes then added that she would cancel her travel plans, but that her “companion healing dog” had to accompany her to the deposition. When counsel for the Administrator tried to explain that she would need to check the Prudential Building’s policy regarding animals before granting her that permission, Ms. Sykes hung up.

6. After checking with the Prudential Building, and discussing the matter with the Administrator, it was determined that Ms. Sykes would not be permitted to bring her dog into the Prudential Building unless it was a service dog trained to assist people with visual or hearing

impairments. This was communicated to both Ms. Sykes and Respondent, and Ms. Sykes was asked to provide documentation showing that her dog was a service dog.

7. On June 29, 2012, Ms. Sykes left a voice message for the Administrator which was forwarded to Counsel for the Administrator, stating that she had had plans to travel for the Fourth of July since February 2012 and telling the Administrator that Counsel for the Administrator would not accommodate her schedule. Ms. Sykes' statement that she had plans to travel for the Fourth of July since February 2012 is inconsistent with her statement that she had made plans between the time she wrote her letter acknowledging July 2 or July 5 as deposition dates and the time she was served with the subpoena.

8. On July 2, 2012, Ms. Sykes faxed another letter to Counsel for the Administrator stating that she had had plans to travel over the Fourth of July holiday since February 2012.

9. On July 2, 2012, because Ms. Sykes still had not provided documentation that her dog was a certified service dog, counsel for the Administrator informed Respondent, by way of facsimile, that she would be willing to take Ms. Sykes' deposition on July 5, 2012 at a neutral location into which she would be permitted to bring her dog.

10. On July 5, 2012, Ms. Sykes did not appear for her deposition in this matter.

11. On July 11, 2012, after received a voice message from Ms. Sykes, Counsel for the Administrator sent a letter to Respondent attempting to reschedule Ms. Sykes' deposition. In efforts to accommodate Ms. Sykes, Counsel for the Administrator agreed to depose Ms. Sykes at a neutral location where Ms. Sykes would be permitted to bring her dog.

12. On Thursday, July 12, 2012, Ms. Sykes notified counsel for the Administrator by letter that she was available to be deposed on July 27, 2012, and that she had reserved a room at the Holiday Inn and Suites in downtown Chicago for the deposition. Ms. Sykes' letter is

attached as Exhibit 1. Counsel for the Administrator was out of the office on Friday, July 13, 2012.

13. After discussing the matter with the Administrator, Counsel for the Administrator sent Respondent and Ms. Sykes letters on Monday, July 16, 2012, stating that she could conduct the deposition in a conference room at the Holiday Inn, or in a law office conference room, but not in a hotel room. Those letters are attached as Exhibit 2.

14. On July 16, 2012, Respondent sent a letter to counsel for the Administrator acknowledging the concerns regarding going to a hotel room and stating that his secretary would relay those concerns to Ms. Sykes. That letter is attached as exhibit 3

15. On July 20, 2012, Ms. Sykes called the Commission and left a message stating that she had not heard back from counsel for the Administrator regarding July 12, 2012 letter. Therefore, Counsel for the Administrator faxed her a copy of the letter that had been mailed to her on July 16, 2012.

16. On July 20, 2012, after Counsel for the Administrator faxed the letter to Ms. Sykes, Ms. Sykes called the Administrator and informed his secretary that she had reserved a suite at the Holiday Inn and Suites and that there was a door separating the bedroom so that there would be no concern that she would “sexually assault Ms. Black.” Ms. Sykes also left a message on the Administrator’s voicemail falsely stating that Counsel for the Administrator had waited two weeks after she reserved the Holiday Inn to raise an objection to the location (But see Ms. Sykes’ letter dated Thursday, July 12, 2012 and Counsel for the Administrator’s response dated two business days later on Monday, July 16, 2012 contained in exhibits 1 and 2). Ms. Sykes also stated in her voice message that she had reserved a suite and that she would not get a conference room.

17. Counsel for the Administrator has made more than enough effort to accommodate Ms. Sykes' demands regarding the date of her deposition and her insistence that she bring her dog.

18. For reasons related to safety the Commission will not permit Counsel for the Administrator to depose Ms. Sykes in a private hotel room. Because Ms. Sykes is not amenable to having her deposition taken in a conference room, the Administrator will be unable to take Ms. Sykes' deposition.

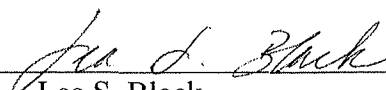
19. The Administrator will be prejudiced if Respondent is allowed to present the testimony of Gloria Sykes given that she has not been cooperative regarding the scheduling of her deposition.

20. A proposed order is attached.

WHEREFORE, the Administrator requests that the Hearing Board enter an order barring Respondent from presenting Gloria Sykes as a witness at the hearing in this matter.

Respectfully submitted,

Jerome Larkin, Administrator  
Attorney Registration and  
Disciplinary Commission

By:   
Lea S. Black

Lea S. Black  
Wendy J. Muchman  
Counsel for the Administrator  
One Prudential Plaza  
130 East Randolph Drive, Suite 1500  
Chicago, Illinois 60601  
Telephone: (312) 565-2600

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

In the Matter of: )  
 )  
 KENNETH KARL DITKOWSKY, )  
 ) Commission No. 2012PR00014  
 Attorney-Respondent, )  
 )  
 No. 642754. )

ORDER

On the Administrator's Motion to bar the Respondent from presenting Gloria Sykes as a witness at hearing:

It is hereby ordered that:

The Administrator's Motion is ALLOWED/DENIED. Respondent is barred from presenting Gloria Sykes as witnesses at the hearing in this matter.

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Jeffrey S. Torosian, Chair  
Hearing Panel

Date Entered: \_\_\_\_\_

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From the Desk of *Gloria Jean Sykes*

July 12, 2012

Ms. Lea Black  
C/O ARDC Chicago

RE: Kenneth Karl Ditkowsky  
Commission No. 2012PR00014

Confirmation of 27 July 2012 Deposition  
At Holiday Inn & Suites Chicago and  
Freedom of Information Request

Dear Lea Black,

I just received an email from attorney Kenneth Ditkowsky reporting that he and you have come up with a few more dates, giving me the opportunity to appear at a place of my choice and participate in a deposition so, among other things, I can create a record of the truths surrounding the wrongful and lawless guardianship of my mother, Mary G. Sykes – and prayerfully save her life! I will schedule the 27<sup>th</sup> July 2012 and have between 10 am and 1 pm blocked off for this deposition. I have booked a room at the Holiday Inn and Suites in Downtown Chicago: it will make for a neutral and safe area for this deposition. I've already given Ken the address. I need to know who will be in attendance and will have coffee, tea, water, and even some fruit available, as I am certain the ARDC would have also provided at least coffee, tea, or water! That said, please provide me a list of names so I can put at the front desk: I will only allow people who I have their names first as to prevent any ambushes and/or harassment by people who have, in the past repeatedly attempted to bully, harass, intimidate and even physically harm me in order to silence me. Unless I hear back from you that this date and time is **not** convenient to you and your colleagues at the ARDC by tomorrow, 13 July 2012, then it will be inked into my schedule. Freedom of speech, rights of privacy, due process, et al, are the glories of American democracy, yet, like democracy – making the law actually work requires real effort both inside and outside of government.

On another point, under the Freedom of Information Act (FOIA) I would appreciate if you would send me all of the documents, files, recordings, transcripts, et al, given to you by Adam Stern, Cynthia Farenga, Peter Schmiedel, and Joel Brodsky so I can better understand how the ARDC made its decisions that none of these attorneys were in violations of the Professional Codes of Ethics. These documents are vital resources for me, among other things a journalist and author, to complete one chapters currently titled, "ARDC" These documents provide first-hand, real-time accounts of the events as they unfolded, and I promise to publish without the editorial filter that characterizes secondary sources. Although it is believed that nonpolitical and career staff at the ARDC largely drive your investigative process, it is known that access to information is not wholly insulated from the eb and flow of the political climate. FYI, I did not receive any documentations (or even a letter) as to the ARDC ignoring, or dismissing my complaints, other than the most recent complaint against attorney Deborah Jo Soehlig: the words and phrases in that letter suggest that the ARDC does not care about attorneys such as she lying to the Courts/Judges for her own personal financial gain. (The Barry case suggest otherwise, but \*\*\*) Suffice, I am requesting that the ARDC turn over all of the information provided to them by Adam Stern, Cynthia Farenga, Peter Schmiedel and Joel Brodsky that would give the ARDC cause to 'dismiss', 'reject', 'ignore' or otherwise, empower these attorneys to be more lawless.

Let me give you an example. Adam Stern filed a motion with the Federal Bankruptcy Court stating that Adam Stern did an "investigation" and found that I had 'control of' my mother's 'assets' (bank accounts) and of her 'two homes' and was in the process of disseminating the assets. Therefore, the court has/had jurisdiction over me and Adam Stern is 'immune' from any wrongdoing. The fact is and good evidence will show that Mr. Stern did not do any investigation as he was ordered, and his client (yes, he often called Carolyn Toerpe his client) is the perpetrator. Oh hell, attorney Adam Stern told CBS reporter on camera that I stole over \$500,000 from my

mother, when in fact, it is Toerpe and Stern knows this. Stern and Farenga also told the Court that I 'abused' my mother when even Adam Stern recently told the court that Carolyn Toerpe is the respondent to a petition for an order of protection and it's still pending in the Probate Division. To be clear, Ms. Black, I need all of the information you collected from the above stated attorneys which discredited, demonized, and libeled my good name – and of course, lends to why the ARDC rejected all of my and other people's complaints against Adam Stern, Cynthia Farenga, Peter Schmiedel, Joel Brodsky, and Deborah Jo Soehlig. This information is needed ASAP, please.

The FOIA's expedited processing provision, added in 1996 is intended to help journalists who need to get information quickly for publication and others who have an urgent need for records. Expedited processing is available, I know, where the requester can show 'compelling need' for the information, as defined in the statute. Congress intended expedited processing to be an exceptional option for matters that are truly urgent, and will be processed quickly at the expense of the ARDC. As I am filing complaints against Adam Stern (and probably the other attorneys shortly after) with the United States Bankruptcy Court, Northern Division, Illinois Fraud division on Monday July 16, 2012, this request falls within at least three of the grounds for expedited processing:

**“If failure to obtain the requested records expeditiously poses an imminent threat to the life or physical safety of an individual.”**

**“If failure to get the requested records in an expedited fashion will result in the loss of substantial due process rights of any person.”**

**“If the request involves a matter of ‘widespread and exceptional media interest in which there exist possible questions about the government’s integrity which affect public confidence.’”**

The dates of information spans from January 2009 through current, and if in fact you have been provided accurate information from the attorneys Adam Stern, Cynthia Farenga, Peter Schmiedel, Joel Brodsky and Deborah Jo Soehlig, then you will have copies of all of the February 2009 complaint my mother filed with the Illinois Department on Aging naming Carolyn Toerpe a thief – who willfully stole money and deprived Mother of her assets and of course the June 9, 2009 petition for an order of protection naming Carolyn Toerpe the abuser and such document was verified by State Employees who met with Mary G. Sykes. You will also have at least 25 police reports from the Naperville Police and the 16<sup>th</sup> District Police, two of which on May 23, 2009 Mary G. Sykes called and asked for assistance because she feared Toerpe and didn't want to be dragged out of her home, and then of course September 20, 2009. Catholic Charities should have also provided all of their reports, and I'm specifically looking for the evidence Adam Stern reported to the Court that I was the abuser!

**IMPORTANT: In this request, please provide me the proof that had to be given to the ARDC which proves that the Probate Division had/has jurisdiction of Mary G. Sykes and/or the myself, or that there is even a guardianship and that the *In re Guardianship of Ralph F. Sodini, 172 Ill. App.3d 1055 (1988) 527 N.E.2d 530* jurisdictional requirements have been met.**

Failure to give notice to such relatives is a jurisdictional defect requiring vacation of the order appointing a guardian  
- in *In re Estate of Debevec, 1990*

Without jurisdiction, Ms. Black, I need to understand how it is that the ARDC denied, dismissed, and/or simply ignored the many complaints against attorneys Adam Stern, Cynthia Farenga, Joel Brodsky, Peter Schmiedel and Deborah Jo Soehlig so I can perfect all news, documentary and or/ magazine or book chapter publications, of which I have a deadline on my book and need to know to finalize the national docu-drama for a green light.

To close, I have scheduled the 27<sup>th</sup> July 2012 for the deposition which will be taken at the Holiday Inn and Suites which is in downtown Chicago. Mr. Ditkowsky has the address. I do need the names of all people who

will be present and will only allow the front desk to give out information to the names on that list. Perhaps we should all meet in the lobby at 9:45 so we can begin at 10 am as I have a four hour block. If you have any questions, Ms. Black, you can call me at 773-910-3310. I can pick up the documents on Monday, but please give me a good time as I will have a friend drive me to your location –

And yes, Shaggy will be with me and at my side during this deposition. I look forward to having the truth on record, although my affidavit is already on file. I am volunteering to take this deposition, as I volunteered to write the affidavit only because of the love I have for my mother and the need to save her life. I'm kind of a pain in the ass that way, Ms. Black. My father taught me that the truth leaves tracks and, as he'd quote the Texas Rangers, "*No man in the wrong can stand up to a woman in the right who keeps on a comin*". Making our laws work depends on all of us working together. Imagine the lives we will save.

Healthy Regards,

Gloria Jean Sykes  
6016 N. Avondale  
Chicago IL 60631

CC: ARDC Springfield: Mr. Larkin, Kenneth Ditkowsky, Scott Evans, Kathie Bakken, NAGA, Tim Lahrman

***Gloria Jean Sykes***

***Bon Ami Productions, Inc.***

773.910-3310(cell)

773.631-9262 (fax and office line)

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager. This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.





ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION  
of the  
SUPREME COURT OF ILLINOIS  
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Springfield, IL 62701  
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Fax (217) 522-2417

**VIA FACSIMILE (847) 600-3425**

Kenneth Karl Ditkowsky  
Attorney at Law  
5940 W. Touhy, Suite 230  
Niles, IL 60714

Chicago  
July 16, 2012

Re: Kenneth Karl Ditkowsky


Commission No. 2012PR00014

Dear Mr. Ditkowsky:

I have received the enclosed correspondence from Gloria Sykes selecting the date of July 27, 2012 at 10:00 a.m. for her deposition. I have blocked that date and time off on my calendar for her deposition; however, the matter of the location must still be discussed. In Ms. Sykes' correspondence she mistakenly states that I said that she could choose the location of the deposition. What my correspondence to you said was that we could conduct her deposition at a mutually agreeable neutral location. While I do not have a problem with the Holiday Inn in downtown Chicago, my office will not allow me to conduct a deposition in a hotel room. If Ms. Sykes would like to reserve a conference room at the Holiday Inn & Suites, or at some other venue appropriate for a legal proceeding (such as a law office's conference room), that would be agreeable. Please let me know if a conference room at the Holiday Inn is agreeable to all parties, or if other arrangements need to be made for the location of Ms. Sykes' deposition.

Thank you for your anticipated cooperation.

Very truly yours,

  
Lea S. Black  
Counsel

LSB:srh  
Attachments

MAINLIB\_#419981\_v1



ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION  
of the  
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(217) 522-6838 (800) 252-8048  
Fax (217) 522-2417

Gloria Sykes  
6016 N. Avondale  
Chicago, IL 60631

Chicago  
July 16, 2012

Re: Kenneth Karl Ditkowsky

Commission No. 2012PR00014

Dear Ms. Sykes:

I have received your correspondence regarding the date, time, and location of your deposition. In that correspondence you also make a request for information under the Freedom of Information Act.


With respect to your deposition, I have scheduled the date and time of July 27, 2012 at 10:00 a.m. for your deposition and I will reserve a court reporter to be present. However, Mr. Ditkowsky and I will need to work out the location of the deposition as this office will not permit me to meet respondents or witnesses in a hotel room. There is no problem with conducting your deposition at the Holiday Inn & Suites if it is conducted in a conference room, but I am not permitted to go into a hotel room. If this is not a possible arrangement, perhaps we can arrange to conduct your deposition in a law office conference room that will allow your dog to be present. I also must ask what type of dog Shaggy is so that I can fully inform the court reporting service of the circumstances under which they will be working.

With respect to your Freedom of Information Act (FOIA) request. The Illinois FOIA mandates that “[e]ach public body shall make available to any person for inspection or copying all public records, except as otherwise provided in Section 7 of this Act.” 5 ILCS 140/3(a). Section 2(a) of the Act defines “public body” as “any legislative, executive, administrative, or advisory bodies of the State... which are supported in whole or in part by tax revenue, or which expend tax revenue.” 5 ILCS 140/2(a). Thus, the judicial branch is excluded from the disclosure requirements of the Act. *See Copley Press Inc., v. Administrative office of the Illinois Courts, et al.*, 271 Ill App.3d 548, 648 N.E.2d 324, 207 Ill. Dec. 868 (2d Dist. 1995), leave to appeal denied, 163 Ill.2d 551 (1995). Because this Commission is part of the judicial branch, and because it is not an administrative body which is supported by or which expends tax revenue, it

Ms. Sykes  
July 16, 2012  
Page Two

is not subject to the Illinois FOIA. However, if you would like copies of the pleadings that have been filed in this matter, you can contact the Clerk's office, which is located on the 11<sup>th</sup> floor of the Prudential Building.

Very truly yours,

  
Lea S. Black  
Counsel

LSB:srh  
MAINLIB\_#420245\_v1





**Law Offices**  
**KENNETH DITKOWSKY**

5940 W TOUHY AVE  
NILES, ILLINOIS, 60714  
Telephone 847 600 3421  
Fax 847 600 3425

July 16, 2012

**Confidential Memorandum:**

To: Ms. Lea Black

---

Thank you for your current efforts to accommodate Ms. Sykes.

As you are aware, I do not represent Ms. Sykes and therefore as a matter of courtesy and politics you should be communicating directly with Ms. Sykes. Except for the very same communications that you received I **do not** have a clue as to what type of facility was engaged for the deposition. I assume that it was a meeting room; however, as I had nothing to do with the arrangements I can provide no input (except to make a suggestion) in the choice of a site or the facility.

That said, I understand your offices' concern. I also understand Ms. Syke's concerns and I wish to go on record that to have a deposition at the Holiday Inn or some similar facility is not unprecedented. I did attend a deposition taken by a female Assistant United States Attorney in a motel room in Rockford, Illinois and I recall a deposition being taken on a 'boat' floating on Biscayne Bay, Miami Florida. Both of the depositions – like the Gloria Sykes deposition – were entirely proper and well chaperoned. The object was to obtain the information that was relevant or might lead to relevant information.

**That said, to cover our bases and to not further aggravate Ms. Sykes at the very least send her a e-mail note suggesting that 'ground rules required by your office' and your valiant efforts to accommodate her.** As you are very well aware, Ms. Sykes does not wish my interference in her affairs and is an independent witness. I do not act for her (or anyone else without their permission). With that stipulation Ms. Matson, who is out of the office today sick, will relay your concerns to Ms. Sykes and attempt to work out whatever difficulties exist. Please recognize Ms. Sykes' independence and right as a citizen to the same.

I have not copied Ms. Sykes on this memorandum as I do not wish to stir up any more acrimony than presently exists. It is my opinion that it would be advisable for you to forget this afternoon's fax when you contact Ms. Sykes. It was reported to me that Carolyn Troepe was found by Judge Garber to be in contempt of court on Friday and today Ms. Sykes discovered that the order entered deleted the words and phrases ordered by Judge Garber. Such perfidy by opposing counsel does not enhance the reputation of the 2<sup>nd</sup> oldest profession. (Ms. Sykes has ordered the transcript and will be in court to ask that the order reflect the ruling by the Judge!)

Sincerely,

Ken Ditkowsky

KKD/lgc