

ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION
of the SUPREME COURT OF ILLINOIS
COMPLAINT FORM

Return completed form by e-mail, mail or facsimile to:

ARDC, 130 E. Randolph Dr., Ste. 1500, Chicago, IL 60601-6219

Phone: (312) 565-2600 or (800) 826-8625 | Email: information@iardc.org

1. Your name: Terri P Tepper & Jordan Tepper Weiner

Street address: 261 Kimberly Road

City: North Barrington State: IL Zip: 60010

Home phone: (281) 961-4002 Work phone: (281) 961-4002

Cell phone: (281) 961-4002

Email address: jordan@internetconsultinginc.com

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2. Name of lawyer/person you want to be investigated: Antonio DeBlasio, Esq.

Name of law firm or business: DeBlasio Law Group LLC

Street address: 1S660 Midwest Road, Suite 230

City: Oakbrook Terrace State: IL Zip: 60181

Phone: (630) 560-1123

Email address: [Available from law firm at above phone number]

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3. Have you previously contacted the ARDC regarding this matter? Yes No

If yes, when and how did you contact us? N/A

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4. Did you employ the lawyer/person you are complaining about: Yes

4a. If you answered yes to question 4:

When did the employment start? June 7th, 2025

What was the fee agreement? \$7,500 initial retainer, \$7,500 additional retainer after
Petition to Vacate was filed

How much have you paid the lawyer/person to date? \$15,000

4b. If you answered no to question 4 what is your connection to the lawyer/person?

I am the son of the client, Terri P. Tepper. Respondent Attorney Antonio DeBlasio was retained by my mother in August 2025 to represent her in federal court proceedings to vacate a FINRA arbitration award (Case No. 1:25-cv-09985). I acted on behalf of my mother throughout the representation, provided all necessary documents to the attorney, communicated extensively with the attorney regarding critical case deadlines, and am also a party to the related FINRA arbitration. I am now proceeding pro se in the federal litigation after the attorney withdrew following his malpractice.

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5. If your request relates to a court case or other proceeding, please provide the following:

Name of court or agency: United States District Court for the Northern District of Illinois, Eastern Division

Name of case: Terri Tepper v. Oppenheimer & Co., Inc.

Case number: 1:25-cv-09985

Judge: Honorable Franklin U. Valderrama

Related Matter: FINRA Arbitration Case No. 24-02286

6. Please explain your complaint(s). Include important dates and names of witnesses and others involved. Use additional pages if necessary. Attach copies of documents that support your complaint, such as fee agreements, receipts, checks, letters and court papers.

COMPREHENSIVE EXPLANATION ATTACHED

Please see the attached detailed "Request for Investigation" document which provides a comprehensive explanation of Respondent's violations of the Illinois Rules of Professional Conduct, supported by substantial documentary evidence.

EXECUTIVE SUMMARY OF COMPLAINT:

Nature of Misconduct: Attorney malpractice in time-sensitive federal court proceeding resulting in missed statutory service deadline, exposure of client to sanctions, and subsequent abandonment of client.

Rules Violated:

- Illinois Rule of Professional Conduct 1.1 (Competence)
- Illinois Rule of Professional Conduct 1.3 (Diligence)
- Illinois Rule of Professional Conduct 1.4 (Communication)
- Illinois Rule of Professional Conduct 8.4(c) (Dishonesty)
- Illinois Rule of Professional Conduct 1.16(d) (Terminating Representation)

KEY FACTS IN CHRONOLOGICAL ORDER:

May 23, 2025

- FINRA arbitration award issued and served on my mother, Terri P. Tepper
- Statutory deadline under 9 U.S.C. § 12: Service required by August 25, 2025
(August 23 fell on Saturday, extended to Monday August 25)

August 2025

- Mother retained Respondent to file Petition to Vacate in federal court
- I acted on mother's behalf throughout representation

August 14, 2025

- I emailed Respondent confirming federal filing deadline
- I explicitly warned Respondent the deadline was "5 days away"
- I inquired about status of filing preparation
- Evidence: Exhibits B2, B5

August 17, 2025

- I provided Respondent with complete service package - all documents needed
- This gave Respondent EIGHT DAYS to effect service before deadline

- Evidence: Exhibit B1

August 20, 2025

- Respondent filed Petition to Vacate with federal court
- Respondent emailed stating motion was filed "on time"
- Respondent DID NOT serve Oppenheimer & Co., Inc. (opposing party)
- Respondent falsely represented the matter was properly handled
- Evidence: Exhibit B3

August 27, 2025

- Respondent finally served Oppenheimer - TWO DAYS after statutory deadline expired
- Service was late due to Respondent's failure to calendar deadline despite multiple client warnings
- Respondent did not inform client of service failure

October 23, 2025

- Oppenheimer filed Cross-Motion to Confirm Award arguing Petition is time-barred
- Oppenheimer's motion falsely states: "Petitioner sat on it for a week"
- Oppenheimer threatened sanctions against my mother for late service
- This created false official record blaming client for attorney's malpractice
- Evidence: Oppenheimer Cross-Motion (attached)

October 14, 2025

- Conference call between myself, mother, and Respondent (recorded with consent)
- Respondent explicitly acknowledged:
 - His duty to manage case deadlines

- His failure to calendar the service deadline despite client warnings
- His sole responsibility for the service failure
- That the service error constituted legal malpractice
- Evidence: Official certified transcript (Exhibit A - 45 pages)

November 3, 2025

- I sent Respondent formal demand letter requesting corrective action
- I requested Respondent file appropriate motions to remedy his malpractice
- I requested Respondent protect mother from sanctions caused by his errors
- Respondent refused to take any corrective action
- Evidence: Exhibit B10

October 15, 2025 (approximate)

- Respondent filed Motion to Withdraw from representation
- Respondent abandoned mother at critical juncture while she faces sanctions
- Mother unable to obtain substitute counsel on short notice
- Mother forced to proceed pro se against sophisticated opposing counsel
- Evidence: Exhibit A1

SPECIFIC HARM TO CLIENT:

1. False Official Record in Federal Court

Oppenheimer's cross-motion creates false record stating "Petitioner sat on it for a week" when evidence proves client timely performed all obligations and warned attorney multiple times about deadline.

2. Exposure to Sanctions

Mother now faces potential sanctions, attorney fee awards, and costs for procedural defaults caused entirely by Respondent's malpractice, not client conduct.

3. Potential Dismissal of Petition

Oppenheimer argues Petition is time-barred, which would deny mother any judicial review of allegedly improper arbitration award - all due to attorney's service failure.

4. Loss of Counsel at Critical Time

Respondent withdrew after his malpractice created crisis, leaving mother unable to obtain substitute counsel and forcing her to proceed pro se.

5. Reputational Harm

Mother's reputation before federal court damaged by false characterization that she caused procedural failures.

6. Emotional and Financial Distress

Mother, as executor of deceased husband's estate, suffered significant distress from being forced to navigate complex federal litigation pro se while facing sanctions for errors she did not commit.

RESPONDENT'S ACKNOWLEDGMENT OF MALPRACTICE:

On October 14, 2025, Respondent participated in recorded telephone conference

where he made explicit admissions of malpractice. A certified transcript prepared by Pamela S. Warren, CSR, RPR, is attached as Exhibit A and conclusively establishes:

- Respondent acknowledged his professional duty to manage case deadlines
- Respondent admitted he failed to calendar the service deadline
- Respondent admitted he received multiple warnings from client about deadline
- Respondent accepted full responsibility for service failure
- Respondent acknowledged the conduct constituted legal malpractice
- Respondent discussed remedies but subsequently refused to implement them

This admission distinguishes this case from typical client-attorney disputes.

Respondent has acknowledged his malpractice but refuses to remedy the harm.

PRIOR ATTEMPTS TO RESOLVE:

Before filing this complaint, I made extensive good-faith efforts to resolve this matter directly with Respondent:

1. October 14, 2025: Conference call where Respondent acknowledged malpractice and discussed potential remedies (Exhibit A)
2. October 2, 2025: Email exchange documenting attorney's malpractice acknowledgment (Exhibit B9)
3. November 3, 2025: Formal written demand letter requesting Respondent take

corrective action to protect mother from sanctions and correct false federal court record (Exhibit B10)

4. Multiple email communications requesting assistance in remedying the harm (Exhibits B1-B11)

Respondent refused all requests for corrective action. This ARDC complaint became necessary only after Respondent's refusal left no alternative to protect my mother's interests in pending federal litigation.

RULES OF PROFESSIONAL CONDUCT VIOLATED:

The attached comprehensive Request for Investigation provides detailed legal analysis of each rule violation. Summary:

- Rule 1.1 (Competence): Failed to exercise basic competence by not calendaring critical deadline; failed to understand filing vs. service distinction; failed to implement deadline management procedures despite client warnings.
- Rule 1.3 (Diligence): Failed to serve for seven days after filing; failed to act promptly on service package provided by client; abandoned client after creating crisis.
- Rule 1.4 (Communication): Falsely represented filing was "on time"; failed to disclose service requirement; failed to inform client of service failure.

- Rule 8.4(c) (Dishonesty): Made false representations about timeliness; failed to disclose service failure; allowed client to believe matter was properly handled when it was not.
- Rule 1.16(d) (Terminating Representation): Withdrew after his malpractice created crisis; failed to remedy harm before withdrawing; abandoned client while facing sanctions.

RELIEF REQUESTED:

I respectfully request that the ARDC:

1. Investigate Respondent's conduct and determine whether he violated the Illinois Rules of Professional Conduct as detailed in attached complaint
2. Require Respondent to file an affidavit or declaration in federal court accepting responsibility for service failure and correcting the false record
3. Require Respondent to take corrective action to protect my mother from sanctions, fee awards, and adverse rulings caused by his malpractice
4. Require Respondent to cooperate with efforts to seek equitable tolling or other relief in federal court based on attorney malpractice
5. Take appropriate disciplinary action commensurate with severity of misconduct

6. Take action necessary to protect public from similar harm by this attorney

WITNESSES:

- Terri P. Tepper (client/mother) - 261 Kimberly Road, North Barrington, IL 60010
- Jordan T. Weiner (complainant) - Contact information above
- Pamela S. Warren, CSR, RPR (transcript preparer) - 23869 N. High Ridge Drive, Lake Zurich, IL 60047, pswcsr@gmail.com

SUPPORTING DOCUMENTARY EVIDENCE:

All exhibits referenced above are attached in Master Exhibits package:

- Exhibit A: Official Transcript (October 14, 2025) - 45 pages
- Exhibit A1: Motion for Leave to Withdraw Appearances
- Exhibit B: Email Chain Summary
- Exhibits B1-B11: Complete email documentation (August-November 2025)
- Oppenheimer Cross-Motion to Confirm Award (October 23, 2025)

ATTACHED DOCUMENTS:

1. Comprehensive Request for Investigation (detailed complaint with full legal analysis and citations) - approximately 15 pages
2. Master Exhibits Package (375 pages total) containing all documentary evidence referenced above

VERIFICATION:

This complaint is filed in good faith based on substantial, documented evidence of attorney misconduct that has caused significant harm to my mother. I attempted multiple times to resolve this matter directly with Respondent before filing this complaint. I am available to provide any additional information or testimony the ARDC may require in its investigation.

Signature: *Terri P. Tepper* _ Date: November 20, 2025

Terri P. Tepper

Signature: *Jordan Tepper Weiner* _ Date: November 20, 2025

Jordan T. Weiner

DECLARATION UNDER PENALTY OF PERJURY

I, Jordan T. Weiner, declare under penalty of perjury that I have read the foregoing Request for Investigation and that the facts stated herein and in the attached comprehensive complaint are true and correct to the best of my

knowledge, information, and belief.

I understand that filing a false or frivolous complaint with the ARDC may subject me to sanctions. I affirm that this complaint is filed in good faith based on documented evidence of attorney misconduct.

I am available to provide any additional information or testimony the ARDC may require in its investigation of this matter.

Executed this 20th day of November, 2025, at North Barrington, Illinois.

Terri P. Tepper

Terri P. Tepper

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North Barrington, IL 60010

(281) 961-4002

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&

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