

Terri Tepper & Jordan Weiner  
By Email: jordan@internetconsultinginc.com  
January 22, 2026

***VIA EMAIL***

John R. Cesario  
Senior Counsel/Intake Division  
Illinois Attorney Registration and  
Disciplinary Commission  
One Prudential Plaza  
130 E. Randolph Drive, Suite 1500  
Chicago, Illinois 60601

**Re: Antonio DeBlasio in relation to Terri Tepper**

**Commission No. 2025IN04977  
REPLY TO RESPONDENT'S RESPONSE**

Dear Mr. Cesario:

We write in reply to the January 16, 2026 response submitted by Allison L. Wood on behalf of Antonio DeBlasio (the "Response"). The Response contains material misrepresentations, omits critical facts, and fundamentally mischaracterizes both Mr. DeBlasio's conduct and the resulting harm to Complainants. What was initially characterized as an isolated "honest mistake" now reveals itself, upon examination of the full record, as a pattern of conduct that systematically harmed Complainants while benefiting the opposing party, Oppenheimer & Co., Inc. ("OPCO").

**I.**

**SUMMARY OF CRITICAL FACTS OMITTED FROM THE RESPONSE**

The Response fails to address the following documented facts, each of which is supported by written evidence:

**A. Six Documented Warnings About the Deadline**

Mr. Weiner sent Mr. DeBlasio **six separate communications** warning about the critical importance of not missing the service deadline. The final warning, sent on August 18, 2025, explicitly stated: *"missing the filing deadline would obviously be catastrophic for us."* Despite this extraordinary level of client diligence, Mr. DeBlasio's firm served OPCO three days late.

**B. Six Requests for Official Transcripts - Material Misrepresentation in the Response**

The Response makes a stunning misrepresentation regarding the official transcripts. It states that "Mr. Weiner made repeated requests for something that did not exist and then complained to your office that he did not get it." **This is demonstrably false.**

The official FINRA arbitration hearing was recorded. That audio recording **did exist**. It could have been transcribed at any time. Mr. DeBlasio's firm had access to the recordings from day 1 and throughout the representation. Mr. Weiner requested, then demanded, that Mr. DeBlasio have the official transcripts prepared on **six separate occasions** over a four-month period.

An internal email from Joseph Two (Mr. DeBlasio's associate) to Mr. DeBlasio dated July 10, 2025, states: *"The only thing he is hung up on is the official transcript. He is adamant about getting that."* This proves Mr. DeBlasio **knew** his client wanted the transcripts and chose not to order them.

**The proof that the Response's claim is false: Mr. Weiner obtained the official transcripts himself after Mr. DeBlasio withdrew.** The transcripts *did exist*. They *could have been obtained*. They were *100% essential* to the federal court litigation to vacate the FINRA award. Mr. DeBlasio, as an experienced litigator, knew this. His failure to obtain them—despite six explicit client requests—left Complainants vulnerable to OPCO's argument, that was filed in an official motion against Petitioners, that Petitioners "failed to provide any official hearing transcripts."

The Response's characterization that Mr. Weiner requested "something that did not exist" is either a deliberate misrepresentation or reflects a fundamental misunderstanding of the facts. Either way, it cannot stand.

### **C. Recorded Admission of Full Responsibility**

On October 14, 2025, Mr. DeBlasio made the following recorded admission:

*"Okay. I take full responsibility for anything that has happened on this case. And I want to make that clear to you and to your mom."*

(Transcript p. 3, lines 5-8)

*"No, it is my responsibility to communicate to you what the deadlines were."*

(Transcript p. 2, lines 24-25)

*"So I'm telling you that because I have received this sanctions letter, I am in the process of notifying my carrier because if I did make a mistake, I need to protect myself."*

(Transcript p. 25, lines 17-20)

The fact that Mr. DeBlasio notified his malpractice insurance carrier is itself an admission that his conduct fell below the professional standard of care.

## **II.**

### **MATERIAL MISREPRESENTATIONS IN THE RESPONSE**

#### **A. Misrepresentation: Complainants Said They Were Retaining Other Counsel**

The Response states that Complainants "told him [Mr. DeBlasio] that they would seek new counsel." This is a **material misrepresentation**. **No attorney would agree to take on a complex federal court case challenging a FINRA arbitration award at the eleventh hour,**

especially after Mr. DeBlasio's malpractice had already caused the service deadline to be missed and sanctions were being threatened. Mr. Weiner was forced to proceed pro se—not because he chose to, but because Mr. DeBlasio's malpractice made it impossible to retain competent replacement counsel in time.

## **B. Misrepresentation: No Harm Done — This Claim Is Outrageous**

The Response's claim that "there is no evidence whatsoever that Mr. Weiner or his mother has or will experience reputational harm" and that "a formal complaint is not warranted" is **outrageous** in light of the documented facts.

### **The concrete, quantifiable harm resulting directly from Mr. DeBlasio's malpractice includes:**

1. **Terri Tepper Forced to Abandon a \$95,000+ Claim:** As a direct result of Mr. DeBlasio's misconduct, Terri Tepper—an 83-year-old widow—was forced to withdraw from the federal court case. She had to abandon her claims against OPCO for approximately **\$95,000 in improper fees and commissions** that OPCO charged to her deceased husband's account, plus \$9,000 in expert witness costs, interest, significant administrative costs, and other relief including the \$3,000 cost for transcribing the official FINRA recordings into transcripts, and more. This is not speculative harm—this is a specific dollar amount that Mrs. Tepper can no longer recover because of Mr. DeBlasio's malpractice.
2. **Sanctions Threatened Against an 83-Year-Old Widow:** OPCO filed a sanctions motion directly exploiting Mr. DeBlasio's service deadline miss. Which we would like to point out was not in good faith, because OPCO had given Terri until the 31st to withdraw but filed their motion the day after DeBlasio withdrew—which was on the 24th. This motion named Terri Tepper **personally**. A woman who had already been victimized by OPCO's fiduciary breach was now facing sanctions threats in federal court because of her own attorney's malpractice. How can the Response claim "no harm"?
3. **Fear-Based Withdrawal:** Mrs. Tepper withdrew from the federal court case due to reasonable fear of OPCO's escalating sanctions threats—threats that **only existed because Mr. DeBlasio missed the service deadline**. Her withdrawal was NOT due to any lack of merit in the underlying claims. It was the direct result of Mr. DeBlasio placing her in an untenable position.
4. **Pro Se Representation Against Major Law Firm:** Mr. Weiner was forced to proceed pro se against OPCO's experienced federal court attorneys (Duane Morris LLP), without the benefit of legal representation, in a complex case involving the Federal Arbitration Act.
5. **Procedural Defects Cited Against Petitioners:** OPCO's attorneys argued that Petitioners' motion should be dismissed due to: (a) late service, (b) lack of official transcripts, and (c) procedural deficiencies—**all of which were caused by Mr. DeBlasio's malpractice, not by any fault of Complainants**.

To claim there is "no harm" when an elderly widow was forced to abandon a \$95,000+ claim, faced sanctions threats, and had to withdraw from federal court litigation **directly due to her**

**attorney's admitted malpractice** is not just inaccurate—it is insulting to the Complainants and to this Commission.

### C. Misrepresentation: The Withdrawal Was Not at a Critical Time

The Response claims "the timing of the withdrawal... did not occur during a critical time in the case." This is false. Mr. DeBlasio withdrew on October 23, 2025, just **seven days after admitting malpractice on a recorded call**. The next pending deadline was November 8, 2025—a status report. More critically, OPCO had already filed its cross-motion seeking dismissal and sanctions, and response deadlines were imminent. No reasonable attorney could claim this was not a "critical time."

## III.

### PATTERN OF CONDUCT: NOT AN ISOLATED MISTAKE

What initially appeared to be an isolated service deadline miss now reveals itself as part of a pattern where **every significant action by Mr. DeBlasio helped OPCO and harmed Complainants**:

| Action by Mr. DeBlasio                         | Effect                             |
|--|------------------------------------|
| Missed service deadline despite 6 warnings     | Gave OPCO time-bar defense         |
| Failed to order transcripts despite 6 requests | Gave OPCO evidentiary argument     |
| Admitted full responsibility on recording      | Acknowledged malpractice           |
| Filed Motion to Withdraw blaming clients       | Concealed malpractice from court   |
| Refused to correct record despite offer        | Prevented equitable tolling remedy |

Logic dictates that this consistent pattern—where *every action* benefited OPCO and harmed Complainants—cannot all be coincidence.

## IV.

### MR. DeBLASIO IS NOT "GENUINELY REMORSEFUL" — HE REFUSED ACCOUNTABILITY

The Response claims that Mr. DeBlasio "is genuinely remorseful that this occurred" and that he "admitted the mistake." If that were true, **this ARDC complaint would not exist**.

**Mr. Weiner offered Mr. DeBlasio a straightforward way to avoid any ARDC filing**: simply amend the Motion to Withdraw to correctly attribute the service delay to attorney error—not to the clients. This would have enabled Complainants to argue equitable tolling in federal court, which would have protected Terri Tepper from OPCO's sanctions threats.

Under equitable tolling principles, if the service deadline miss was **the attorney's fault**, not the client's fault, then the client should not be penalized. Mr. Weiner explicitly told Mr. DeBlasio: correct the record, take official accountability for your admitted mistake, and there will be no ARDC complaint.

**Mr. DeBlasio refused.**

A "genuinely remorseful" attorney who had "admitted the mistake" would have taken this simple step to mitigate the harm to his clients. Instead, Mr. DeBlasio:

1. Admitted malpractice privately on a recorded call;
2. Filed a Motion to Withdraw that concealed the malpractice and implied the clients were at fault;
3. Refused to correct the record when explicitly asked to do so; and
4. Now claims through counsel that he is "genuinely remorseful" while continuing to deny any wrongdoing.

**Actions speak louder than words.** Mr. DeBlasio's actions demonstrate that he is *not* remorseful—he is avoiding accountability. He had a clear opportunity to take responsibility and chose not to. That choice forced this ARDC complaint.

## V.

### WHY THIS MATTER MUST PROCEED

The Response argues that "a formal complaint is not warranted." Complainants respectfully but firmly disagree.

**If this Commission closes this matter without action, it will send a message that an attorney can:**

1. Miss critical deadlines despite six client warnings;
2. Fail to perform essential tasks (ordering transcripts) despite six client requests;
3. Admit malpractice privately and then conceal it from the court;
4. File misleading court documents that allow clients to bear blame for attorney error;
5. Refuse to correct the record when given the opportunity; and
6. Escape all accountability by claiming it was an "honest mistake" and expressing "remorse."

The documented harm is real and substantial. Terri Tepper—an 83-year-old widow—was forced to abandon approximately **\$95,000 in claims** against OPCO for improper fees and commissions, plus expert witness costs, interest, and other relief. This is not speculative. This is the direct, quantifiable result of Mr. DeBlasio's malpractice.

If the ARDC allows Mr. DeBlasio to escape accountability, it leaves Complainants with no remedy. The harm has already occurred. The only question is whether this Commission will hold Mr. DeBlasio accountable for conduct that violated multiple Rules of Professional Conduct and caused substantial harm to his clients.

## VI.

### ILLINOIS RULES OF PROFESSIONAL CONDUCT VIOLATED

Mr. DeBlasio's conduct violated multiple Illinois Rules of Professional Conduct:

**Rule 1.1 (Competence):** Missing a critical service deadline despite six client warnings demonstrates incompetent representation. A competent attorney calendars deadlines and serves opposing parties timely.

**Rule 1.3 (Diligence):** Failing to order official transcripts despite six client requests over four months, when such transcripts were essential to the federal court motion, constitutes lack of diligence.

**Rule 1.4 (Communication):** Mr. DeBlasio failed to keep Complainants informed about the true status of the case, including that service had not been completed on time.

**Rule 3.3 (Candor Toward the Tribunal):** Mr. DeBlasio's Motion to Withdraw failed to disclose his admitted malpractice and instead implied that clients were responsible for case difficulties. This lack of candor allowed a false narrative to remain in the federal court record.

**Rule 8.4(c) (Misconduct - Dishonesty):** Admitting full responsibility privately, promising to "take accountability," and then filing a Motion to Withdraw that conceals the malpractice constitutes dishonest conduct.

## VII.

### RESPONSE TO RECORDING CHARACTERIZATION

The Response requests this Commission give the October 14, 2025 recording "no weight." Complainants respectfully submit that **the admissibility of the recording is not the issue**. In addition, Jordan Weiner had told Mr. DeBlasio that he "was paranoid about corruption, so everything, all communications, were on record." The issue is whether Mr. DeBlasio's **conduct** violated the Rules of Professional Conduct.

**Mr. DeBlasio does not deny making the statements attributed to him.** His own words establish that he took "full responsibility," acknowledged it was his duty to communicate deadlines, and notified his malpractice carrier. These facts are not disputed.

## VIII.

### CONCLUSION

Complainants have the truth, the law, and the documented evidence on their side. The evidence establishes:

1. Mr. DeBlasio missed a critical deadline despite extraordinary client diligence (six warnings);
2. Mr. DeBlasio failed to obtain essential transcripts despite six client requests—transcripts that DID exist and that Mr. Weiner later obtained himself;
3. Mr. DeBlasio admitted full responsibility and notified his malpractice carrier;
4. Mr. DeBlasio filed a Motion to Withdraw that concealed his malpractice; And intentionally left Claimants with no legal representation at the eleventh hour.

5. Mr. DeBlasio refused to correct the record when offered the opportunity to avoid this ARDC complaint;
6. Complainants suffered substantial, quantifiable harm including: Terri Tepper being forced to abandon a \$95,000+ claim, plus \$9,000 in expert witness costs, interest, significant administrative costs, and other relief including the \$3,000 cost for transcribing the official FINRA recordings into transcripts, and more. In addition to facing sanctions threats, resulting in a forced withdrawal from federal court, and pro se representation.

The Response's characterization of this as an isolated "honest mistake" by a "genuinely remorseful" attorney is belied by the documented facts. A genuinely remorseful attorney would have corrected the record when asked. Mr. DeBlasio refused. A genuinely remorseful attorney would not have filed court documents that concealed his malpractice and allowed his clients to bear blame. Mr. DeBlasio did exactly that.

**This is not about monetary damages—those remedies exist elsewhere. This is about attorney accountability and the integrity of the legal profession.** When an attorney's malpractice harms clients, and that attorney compounds the harm by concealing the truth from a federal court and refusing to take official accountability, the disciplinary system must respond.

**We respectfully request a prompt ruling in Complainants' favor.**

Time is of the essence. Mr. Weiner has filed motions in federal court (Case No. 1:25-cv-09985, Northern District of Illinois) to proceed pro se on behalf of the Estate of Lawrence Weiner. A prompt ruling by this Commission finding that Mr. DeBlasio's conduct violated the Rules of Professional Conduct **may still allow Complainants to salvage their federal court case.** Such a ruling would:

1. Support the equitable tolling argument that the service delay was caused by attorney malpractice, not client fault;
2. Undermine OPCO's sanctions motion, which is predicated on blaming Complainants for their attorney's errors;
3. Demonstrate to the federal court that Mr. DeBlasio's conduct has been found to violate professional standards; and
4. Help offset the ongoing, escalating harm that Mr. DeBlasio's misconduct caused—harm that has consistently benefited OPCO at the expense of Complainants.

Every day that passes without accountability makes it harder for Complainants to pursue justice in federal court. Mr. DeBlasio's malpractice gave OPCO powerful procedural arguments. A ruling from this Commission would help level a playing field that Mr. DeBlasio's misconduct tilted decisively in OPCO's favor.

**We respectfully urge this Commission to rule promptly in Complainants' favor so that we may have a fighting chance to continue our pro se federal court litigation and seek the justice that Terri Tepper—an 83-year-old widow who lost her husband and then was victimized by OPCO's fiduciary breach—deserves.**

Respectfully submitted,

*Jordan Tepper Weiner*

/s/ Jordan Tepper Weiner  
Jordan Tepper Weiner  
On behalf of Terri Tepper and himself  
jordan@internetconsultinginc.com  
(281) 961-4002

**cc:** Allison L. Wood, Legal Ethics Consulting (via email)