

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, PROBATE DIVISION**

In the Estate of Joseph Ziarnik,  
Plaintiff,

v.

No. 08 P 8140

Tami Goldmann,  
Defendant.

**DEFENDANT'S ANSWER TO COMPLAINT  
AND AFFIRMATIVE DEFENSES TO PLAINTIFFS  
(JANNA DUTTON, JOSH MITZEN, RICHARD BLOCK AND SALLY GRIFFIN)**

**FIRST AMENDED COMPLAINT**

NOW COMES Defendant, Tami Goldmann, pro se, for her ANSWER and  
AFFIRMATIVE DEFENSES to Plaintiffs First Amended Complaint and states as follows:

**INTRODUCTION**

This lawsuit is a sham and only being utilized so the Plaintiff's can profit and exhaust the Estate of Mr. Ziarnik. The Defendant set up a website and blog describing, in detail, the abuse she witnessed the Plaintiffs inflict on a wealthy elderly man. She explained how the Plaintiff, Ms. Dutton utilizes her clients own funds to surround him with her paid employees only to profit and promote herself. Ms. Dutton traps the elder in guardianship, writes his Trust to benefit her, hires her colleagues to exploit him only to become sole heir by abusing the judicial process. This lawsuit is an example of that abuse and further lends credibility to what Ms. Goldmann wrote online.

**ANSWER TO COMPLAINT**

1. Paragraph 1 contains no allegations against the Defendant therefore, no response is required. If an answer is required, Defendant denies the allegations in paragraph 1.

# Answer To Contract Complaint Sample

**Thomas A. Mauet**

A red circular graphic with a gradient, appearing as a partial circle or a thick arc, located to the right of the author's name.

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