

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

In the Matter of:)
)
JEFFREY TABARES,)
) Commission No. 2025PR00009
Attorney-Respondent,)
)
No. 6278573.)

COMPLAINT

Lea S. Gutierrez, Administrator of the Attorney Registration and Disciplinary Commission, by her attorney, Richard Gleason, pursuant to Supreme Court Rule 761(c), complains of Respondent Jeffrey Tabares, who was licensed to practice law in Illinois on November 7, 2002, and alleges that Respondent has engaged in the following conduct which subjects him to discipline pursuant to Supreme Court Rule 770:

(Criminal Conviction for Aggravated Battery)

1. At all times alleged in this complaint, there was in effect a criminal statute in Illinois, Chapter 720, Section 5/12-3.05(f)(1), entitled "Aggravated Battery," which made it a Class 3 felony offense to knowingly and without legal justification cause bodily harm to an individual while using a deadly weapon other than by discharge of a firearm.

2. At all times alleged in this complaint, there was in effect a criminal statute in Illinois, Chapter 720, Section 5/12-3.05(a)(1), entitled "Aggravated Battery," which made it a Class 3 felony offense to knowingly and without legal justification cause great bodily harm or permanent disability or disfigurement to an individual.

3. At all times alleged in this complaint, there was in effect a criminal statute in Illinois, Chapter 720, Section 5/12-3/05(C), entitled "Aggravated Battery," which made it a Class

3 felony offense to knowingly and without legal justification cause bodily harm to an individual while the batterer or the person battered is on or about a public way or public property.

4. At all times alleged in this complaint, there was in effect a criminal statute in Illinois, Chapter 720, Section 5/10-3, entitled “Unlawful Restraint,” which made it a Class 4 felony offense to knowingly and without legal authority detain another.

5. At all times alleged in this complaint, there was in effect a criminal statute in Illinois, Chapter 720, Section 5/10-3.1(a), entitled “Aggravated Unlawful Restraint,” which made it a Class 3 felony offense to knowingly and without authority detain another while using a deadly weapon.

6. On June 20, 2023, Respondent approached R.G. on the sidewalk at the approximate location of 830 South Washington Avenue in Park Ridge. When Respondent approached R.G., Respondent incorrectly believed that R.G. had trespassed on Respondent’s property. With a golf club in his hand, Respondent ordered R.G. to stop walking. R.G. refused, and Respondent struck R.G. in the arm with the golf club. R.G. attempted to walk past Respondent, and Respondent struck R.G. in head with the golf club. In striking R.G.’s head with the golf club, Respondent fractured R.G.’s skull and caused R.G. permanent hearing loss. After Respondent struck R.G. with the golf club, R.G. fled toward his home, located within a block of where Respondent struck R.G. with the golf club. When R.G. arrived to an area in front of his house, he fell to the ground. R.G.’s parents saw R.G. laying on the ground, bleeding from his head, and called police. Park Ridge police arrived on scene within minutes of R.G.’s parents’ call and observed R.G. laying on the ground.

7. Between June 20, 2023 and July 24, 2023, Park Ridge Police investigated Respondent’s actions, described in paragraph six, above. On July 24, 2023, following their investigation, Park Ridge police placed Respondent under arrest for battering R.G.. On August 4,

2023, a grand jury sitting in Cook County issued a true bill charging Respondent with six counts of aggravated battery, one count of aggravated unlawful restraint, and one count of unlawful restraint – all felony charges. The Clerk of the Circuit Court of Cook County assigned the matter a case number 23 CR 0862801.

8. Counts One and Two of the indictment alleged that Respondent committed the offense of aggravated battery when on June 20, 2023, Respondent struck R.G.'s arm and head with a deadly weapon, to wit: a golf club. Counts Three and Four of the indictment alleged that Respondent committed the offense of aggravated battery when on June 20, 2023, Respondent struck R.G.'s arm and head with a golf club causing great bodily harm. Counts Five and Six of the indictment alleged that Respondent committed the offense of aggravated battery when on June 20, 2023, Respondent struck R.G.'s arm and head while on a public sidewalk.

9. Count Seven of the indictment alleged that Respondent committed the offense of aggravated unlawful restraint when he knowingly detained R.G. without legal authority while using a deadly weapon, to wit: a golf club. Count Eight of the indictment alleged that Respondent committed the offense of unlawful restraint when he knowingly detained R.G. without legal authority.

10. On January 16, 2024, February 14, 2024, April 24, 2024, and June 5, 2024, The Honorable Paul Pavlus presided over a bench trial concerning the allegations in the eight-count complaint in case number 23 CR 0862801, described in paragraphs six through nine, above. Over the course of the trial, Judge Pavlus heard all of the witness testimony in the case and received all of the admissible evidence from the parties, including pictures of R.G.'s injuries. After receiving all of the evidence, Judge Pavlus found Respondent guilty of Count Four (aggravated battery – great bodily harm) and not guilty on the remaining seven counts. On December 13, 2024, Judge

Pavlus entered judgment on his finding of guilty and sentenced Respondent to conditional discharge for a term of 30 days.

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

- a. committing a criminal act that reflects adversely on his fitness as a lawyer, by conduct including knowingly and without justification striking R.G. in the head with a golf club causing great bodily harm, in violation of Chapter 720, Section 5/12-3.05(a)(1) of the Illinois Compiled Statutes, in violation of Rule 8.4(b) of the Illinois Rules of Professional Conduct (2010).

WHEREFORE, the Administrator requests that this matter be assigned to a panel of the Hearing Board, that a hearing be held, and that the panel make findings of fact, conclusions of fact and law, and a recommendation for such discipline as is warranted.

Respectfully Submitted,

Lea S. Gutierrez, Administrator
Attorney Registration and
Disciplinary Commission

By: /s/ Richard Gleason
Richard Gleason

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