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

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

ANSWER TO COMPLAINT

Jeffrey Tabares, Respondent, by his attorney, Stephanie Stewart, of Robinson Stewart Doppke LLC, answers the complaint filed by the Administrator in this matter as follows:

DISCLOSURE PER COMMISSION RULE 231(a)

Respondent is licensed in the ND of IL and CD of IL and has not held any other professional license.

(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.

ANSWER: Admitted that such a statute was in effect, denied that paragraph one quotes the exact language of the statute.

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

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Class 3 felony offense to knowingly and without legal justification cause great bodily harm or permanent disability or disfigurement to an individual.

ANSWER: Admitted that such a statute was in effect, denied that paragraph two quotes the exact language of the statute.

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.

ANSWER: Admitted that such a statute was in effect, denied that paragraph three quotes the exact language of the statute.

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.

ANSWER: Admitted that such a statute was in effect, denied that paragraph four quotes the exact language of the statute.

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.

ANSWER: Admitted that such a statute was in effect, denied that paragraph five quotes the exact language of the statute.

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.

ANSWER: Denied. In further answering, R.G. did trespass on Respondent's property, where he lunged and screamed at Respondent's wife. Respondent was not at home, and when Respondent heard what happened from his wife he was concerned for the safety of his wife and young children. Respondent thereafter encountered R.G. in the neighborhood, who lunged at and attacked Respondent. Respondent acted in self-defense with respect to the child-sized golf club that R.G. attempted to grab from him.

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.

ANSWER: Respondent can neither admit nor deny the first sentence due to lack of knowledge. The remainder of Paragraph 7 is admitted.

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.

ANSWER: Admitted.

9. From 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.

ANSWER: Admitted.

10. In 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.

ANSWER: Admitted.

11. By reason of the conduct descried 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).

ANSWER: Denied.

Wherefore, Respondent respectfully requests that the Board dismiss the Complaint and order any other relief it deems just.

Respectfully submitted,

/s/ Stephanie Stewart
Stephanie Stewart

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