

2026 IL App (1st) 250453-U
No. 1-25-0453
Order filed September 28, 2026

First Division

NOTICE: This order was filed under Supreme Court Rule 23 and is not precedent except in the limited circumstances allowed under Rule 23(e)(1).

IN THE
APPELLATE COURT OF ILLINOIS
FIRST DISTRICT

JENNIFER PUTIBET,	)	Appeal from the
	)	Circuit Court of
Petitioner-Appellee,	)	Cook County.
	)	
v.	)	No. 24 OP 77594
	)	
KENDRA TAYLOR,	)	Honorable
	)	Peter M. Gonzalez,
Respondent-Appellant.	)	Judge, presiding.

PRESIDING JUSTICE ELLIS delivered the judgment of the court.
Justices Fitzgerald Smith and Cobbs concurred in the judgment.

ORDER

¶ 1 *Held:* Affirmed. Respondent failed to provide record to demonstrate error in granting of plenary stalking no-contact order.

¶ 2 Respondent Kendra Taylor appeals *pro se* from the trial court’s entry of a plenary stalking no-contact order, or “SNCO,” in favor of petitioner Jennifer Putibet. On appeal, respondent claims the trial court did not consider her “documents” in its decision. Because respondent did not present a sufficiently complete record on appeal for our review, we affirm.

¶ 3 On August 13, 2024, petitioner filed a petition for a SNCO against respondent. Petitioner alleged that (i) on May 19, 2024, about 10 p.m., respondent attempted to assault her at a bar and was escorted from the establishment, and (ii) on August 12, 2024, about 8:30 p.m., respondent allegedly hit petitioner at a bowling alley called Hillside Bowl. Petitioner believed respondent followed her home that second night because, an hour later, respondent tried to enter petitioner's house uninvited, becoming verbally and physically "abusive."

¶ 4 Petitioner sought an order prohibiting respondent from any contact or from entering or remaining within petitioner's residence, place of employment, or three different bowling alleys. Petitioner also requested an injunctive order of "no contact by any means."

¶ 5 The trial court entered an emergency SNCO prohibiting respondent from entering petitioner's residence, place of employment, and three bowling alleys. The order also provided that respondent make "no contact by any means," including through third parties and social media. The emergency order was extended multiple times through February 2025.

¶ 6 On February 13, 2025, the court entered a plenary SNCO prohibiting respondent from coming or remaining within 100 feet of petitioner's residence or Hillside Bowl. The order also provided that respondent was to make "no contact by any means" with petitioner. The order indicated that the court's findings were made orally for transcription, and that respondent was served with the order in open court.

¶ 7 Respondent appealed on March 11, 2025. We took the appeal on respondent's opening brief and the record only. See *First Capitol Mortgage Corp. v. Talandis Construction Corp.*, 63 Ill. 2d 128, 133 (1976) (reviewing court may take case on appellant's brief only).

¶ 8 On appeal, respondent claims the trial court did not accept or consider her “documents” in entering the plenary stalking no-contact order against her. She attaches a number of documents to her brief that are not part of the certified record, including letters from individuals regarding interactions between petitioner and respondent, smartphone screenshots of text messages and social media apps, and a police report.

¶ 9 Respondent’s brief does not comply with Illinois Supreme Court Rule 341(h) (eff. Oct. 1, 2020). For example, in violation of Rule 341(h)(6), respondent sets forth no statement of the facts “necessary to an understanding of the case” stated “accurately and fairly without argument or comment.” Ill. S. Ct. R. 341(h)(6) (eff. Oct. 1, 2020). Rather, she attaches to her brief a letter disputing petitioner’s allegations against her. Respondent’s argument on appeal also contains no citation to authorities or the pages of the record on which she relies. See *id.* R. 341(h)(7).

¶ 10 Supreme court rules are “not mere suggestions.” *SMS Financial CH, LLC v. Feurer*, 2025 IL App (1st) 250033, ¶ 40. A *pro se* litigant must comply with the same procedural rules as attorneys. *Gillard v. Northwestern Memorial Hospital*, 2019 IL App (1st) 182348, ¶ 45. When a party fails to comply with Rule 341, we may strike the brief or disregard noncompliant parts. *Pasic v. Department of Financial & Professional Regulation*, 2022 IL App (1st) 220076, ¶ 15.

¶ 11 That said, our review of the merits of this appeal is hindered by the absence of a report of proceedings. Respondent, as the appellant, carries the burden to provide this court with a sufficiently complete record to support her claim of error. *Foutch v. O’Bryant*, 99 Ill. 2d 389, 391-92 (1984). Without such a record, “it will be presumed that the order entered by the trial court was in conformity with law and had a sufficient factual basis.” *Id.* at 392. Any doubts arising from the incompleteness of the record will be resolved against respondent. *Id.*

¶ 12 Here, respondent claims she was not given the opportunity to “plead [her] case” by providing supporting documents. But she has not provided a report of proceedings from the hearing in which the trial court stated its findings. Nor does the record contain an acceptable substitute such as a bystander’s report or agreed statement of facts. See Ill. S. Ct. R. 323(a), (c), (d) (eff. July 1, 2017). Unfortunately, without this information, we cannot determine what evidence, exhibits, and testimony were admitted or excluded at the February 13, 2025, hearing.

¶ 13 We also have no knowledge of the arguments presented to the trial court or the trial court’s reasoning in entering its order. So we cannot determine whether the trial court’s judgment was against the manifest weight of the evidence. See *Piester v. Escobar*, 2015 IL App (3d) 140457, ¶ 12 (we will only reverse trial court’s entry of stalking no contact order if trial court’s finding is against manifest weight of evidence). Due to the insufficiencies of the record, we have no basis for disturbing the trial court’s judgment and must presume that the trial court’s order conformed with law and had a sufficient factual basis. *Foutch*, 99 Ill. 2d at 392.

¶ 14 To the extent respondent requests that we consider the documents attached to her brief, we cannot do so, as they are not part of the certified record on appeal. See *Kensington’s Wine Auctioneers & Brokers, Inc. v. John Hart Fine Wine, Ltd.*, 392 Ill. App. 3d 1, 14 (2009).

¶ 15 Unfortunately, the absence of information leaves us with no basis to overturn the trial court’s judgment. We are thus compelled to affirm it.

¶ 16 The judgment of the circuit court is affirmed.

¶ 17 Affirmed.