

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).

2026 IL App (4th) 250204-U

NO. 4-25-0204

IN THE APPELLATE COURT

OF ILLINOIS

FOURTH DISTRICT

FILED
May 14, 2026
Carla Bender
4th District Appellate
Court, IL

LEON M. HUDDLESTON, M.D.,)	Appeal from the
Petitioner-Appellant,)	Circuit Court of
v.)	Sangamon County
THE DEPARTMENT OF FINANCIAL AND)	No. 23CH26
PROFESSIONAL REGULATION and CAMILE)	
LINDSAY, in Her Official Capacity as Director of the)	Honorable
Division of Professional Regulation,)	Jack D. Davis II,
Respondents-Appellees.)	Judge Presiding.

JUSTICE ZENOFF delivered the judgment of the court.
Justices DeArmond and Harris concurred in the judgment.

ORDER

¶ 1 *Held:* The appellate court affirmed a judgment denying petitioner’s request for a writ of *mandamus* because he failed to exhaust his administrative remedies.

¶ 2 Petitioner, Leon M. Huddleston, M.D., filed the instant action, seeking a writ of *mandamus* requiring respondents—the Department of Financial and Professional Regulation (Department) and Camile Lindsay, in her official capacity as the Department’s Director of the Division of Professional Regulation—to dismiss a disciplinary complaint filed against him in a separate administrative proceeding. The trial court denied petitioner’s request for *mandamus* relief. He appeals, and we affirm.

¶ 3 I. BACKGROUND

¶ 4 Petitioner is licensed to practice medicine in Illinois. In March 2017, the Department received information that petitioner was allegedly inappropriately prescribing

controlled substances to patients. Shortly thereafter, the Department issued subpoenas to petitioner, requesting his patients' medical records and other documents. When petitioner refused to comply with the subpoenas, the Department filed an administrative complaint against him in July 2017, which was docketed as proceeding No. 2017-3017. See 225 ILCS 60/22(A)(38) (West 2016) (authorizing the Department to discipline physicians for failing to furnish relevant information when legally requested to do so). In conjunction with that proceeding, in January 2019, Lindsay's predecessor in office entered a final order suspending petitioner's medical license indefinitely for failing to turn over the requested records.

¶ 5 Petitioner challenged that decision in an administrative review action that he filed in the circuit court of Cook County. During the course of that proceeding, petitioner turned over the records the Department had requested in 2017. In light of that development, in June 2019, the parties resolved the administrative review action by agreement. Specifically, the parties agreed to (1) vacate the order suspending petitioner's license, (2) remand the matter to the Department for further proceedings, and (3) take the matter off the circuit court's call.

¶ 6 The record does not reflect what, if anything, happened in administrative proceeding No. 2017-3017 between June 2019 and May 2022. However, in May 2022, the Department filed another complaint against petitioner in the same administrative proceeding. This time, the Department sought to discipline petitioner for allegedly inappropriately prescribing controlled substances to patients.

¶ 7 Petitioner moved to dismiss the 2022 disciplinary complaint, contending that it was time-barred because the Department learned in March 2017 that he allegedly prescribed controlled substances inappropriately. See 225 ILCS 60/22(A) (West 2022) (requiring the Department to commence disciplinary actions within five years after receiving "a complaint alleging the

commission of” an act that would subject a physician to discipline). On November 10, 2022, an administrative law judge (ALJ) denied petitioner’s motion to dismiss the 2022 complaint. The ALJ reasoned, *inter alia*, that (1) the Department properly amended its complaint in administrative proceeding No. 2017-3017 pursuant to applicable regulations and (2) the 2022 complaint was timely because it related back to the 2017 complaint. On March 3, 2023, the ALJ denied petitioner’s motion to vacate the November 10, 2022, order. No final order has been entered with respect to the 2022 complaint in administrative proceeding No. 2017-3017. See 68 Ill. Adm. Code 1110.240(a), (c)-(d), (f)-(g) (2019) (providing that an ALJ makes recommended findings of fact and conclusions of law, which the Illinois State Medical Board may adopt, reject, or modify before forwarding the matter to the director, who has the authority to enter a final order).

¶ 8 In August 2023, petitioner filed the present action against respondents in the circuit court of Sangamon County. Relevant to this appeal, petitioner requested a writ of *mandamus* requiring the ALJ to grant his motion to dismiss the 2022 disciplinary complaint as time-barred.

¶ 9 Respondents’ chief argument in opposition to petitioner’s complaint was that the trial court lacked subject matter jurisdiction to grant *mandamus* relief, as petitioner failed to exhaust his administrative remedies. In respondents’ view, petitioner’s sole remedy for the claimed statute-of-limitations violation was to file an administrative review action once there was a final order entered in the administrative proceeding. Petitioner, by contrast, took the position that he was not required to exhaust his administrative remedies, as he was challenging the Department’s authority to exercise jurisdiction over the 2022 disciplinary complaint.

¶ 10 On March 21, 2024, the trial judge who initially presided over this case issued a writ of *mandamus* requiring the ALJ to grant petitioner’s motion to dismiss based on a violation of the five-year statute of limitations. On April 22, 2024, respondents filed a timely motion to

reconsider the March 21, 2024, order. See 5 ILCS 70/1.11 (West 2024) (“The time within which any act provided by law is to be done shall be computed by excluding the first day and including the last, unless the last day is Saturday or Sunday ***, and then it shall also be excluded.”). On September 30, 2024, a different trial judge granted respondents’ motion to reconsider and vacated the March 21, 2024, order, effectively denying petitioner’s request for *mandamus* relief.

¶ 11 On October 30, 2024, petitioner filed a timely motion to reconsider and vacate the September 30, 2024, order. See Ill. S. Ct. R. 274 (eff. July 1, 2019) (providing that if a final judgment is modified based on one party’s postjudgment motion, the other party may then file a postjudgment motion challenging the superseding judgment and the deadline to file a notice of appeal is tolled pending the resolution of that motion). Petitioner later filed an amended motion for reconsideration, which the trial court denied on February 4, 2025.

¶ 12 On March 3, 2025, petitioner filed a timely notice of appeal, specifying his intent to challenge the orders entered on September 30, 2024, and February 4, 2025. Without objection, the trial court granted petitioner’s motion to stay the administrative proceedings pending this appeal.

¶ 13 **II. ANALYSIS**

¶ 14 On appeal, the parties reiterate the positions they took below. They discuss multiple issues, including (1) the merits of petitioner’s statute-of-limitations defense, (2) whether he was required to exhaust his administrative remedies rather than seek a writ of *mandamus*, and (3) whether he satisfied the elements to obtain *mandamus* relief. Both parties assert that we should review the judgment *de novo*. We agree, as the only issue we need to decide is whether the ALJ lacked jurisdiction or authority to deny petitioner’s motion to dismiss, thus excusing petitioner’s failure to exhaust his administrative remedies. That issue involves a pure question of law, which

makes *de novo* review appropriate. See *Goral v. Dart*, 2020 IL 125085, ¶¶ 17, 27 (reviewing *de novo* an order dismissing a complaint for lack of subject matter jurisdiction based on the failure to exhaust administrative remedies); *NorthShore University Healthsystem v. Illinois Department of Revenue*, 2017 IL App (1st) 153647, ¶ 17 (noting that a court reviews *de novo* the question of whether an administrative agency has jurisdiction of a matter).

¶ 15 Although the Illinois Constitution provides that circuit courts generally have “original jurisdiction of all justiciable matters,” circuit courts only possess “such power *** as provided by law” to review administrative actions. Ill. Const. 1970, art. VI, § 9. Relevant here, section 41(a) of the Medical Practice Act of 1987 (225 ILCS 60/41(a) (West 2022)) states that “[a]ll *final* administrative decisions of the Department are subject to judicial review pursuant to the Administrative Review Law [(735 ILCS 5/3-101 *et seq.* (West 2022))] and its rules.” (Emphasis added.) Here, administrative proceeding No. 2017-3017 remains pending, and no final judgment has been entered with respect to the Department’s 2022 disciplinary complaint. Thus, petitioner did not file, and could not have filed, an administrative review action to challenge the ALJ’s interlocutory decision to deny his motion to dismiss the 2022 complaint.

¶ 16 Petitioner’s choice to seek *mandamus* relief in the circuit court while the administrative action remains pending implicates the exhaustion-of-administrative-remedies doctrine. In accordance with this doctrine, as a general rule, “[w]hen the governing statute adopts the Administrative Review Law, ‘a circuit court may not redress a party’s grievance through any other type of action.’ ” *Vasanwala v. Division of Professional Regulation of the Department of Financial & Professional Regulation*, 2024 IL App (4th) 220933, ¶ 14 (quoting *Goral*, 2020 IL 125085, ¶ 40). Of particular relevance to the present appeal, “if the Administrative Review Law provides a remedy, the circuit court lacks jurisdiction to hear an aggrieved party’s claim via other

remedies such as *** *mandamus*.” *Coduto v. County of Cook*, 2024 IL App (1st) 221837, ¶ 13. Some of the reasons for requiring litigants to challenge administrative decisions pursuant to the Administrative Review Law, rather than through other civil actions, are to “protect agency processes from impairment by avoidable interruptions, allow[] the agency to correct its own errors, and conserve[] valuable judicial time by avoiding piecemeal appeals.” *Castaneda v. Illinois Human Rights Comm’n*, 132 Ill. 2d 304, 308 (1989).

¶ 17 The requirement to exhaust administrative remedies is subject to certain exceptions. Petitioner invokes the one that applies “where the agency’s jurisdiction is attacked because it is not authorized by statute.” (Internal quotation marks omitted.) *Goral*, 2020 IL 125085, ¶ 41. Essentially, petitioner argues that because the 2022 disciplinary complaint is barred by the five-year statute of limitations contained in section 22(A) of the Medical Practice Act of 1987 (225 ILCS 60/22(A) (West 2022)) and the relation-back doctrine does not apply to administrative proceedings, the ALJ exceeded his authority by denying the motion to dismiss. Petitioner expresses his belief in his reply brief that “[s]tatutory violations committed by agencies do not make the agencies a nullity, the violations make their actions void.”

¶ 18 Petitioner misconstrues the nature of voidness in connection with the exception he invokes. This exception “permits a party to bypass administrative review when an administrative agency enters an order it has no authority to enter”; however, the exception does not apply where “the agency exercises its authority but misapplies settled law to the facts before it.” *Consolidated Freightways Corp. of Delaware v. Human Rights Comm’n*, 305 Ill. App. 3d 934, 939 (1999). Here, the ALJ who presided over the 2022 disciplinary complaint in administrative proceeding No. 2017-3017 had the authority to rule on petitioner’s motion to dismiss. See 68 Ill. Adm. Code 1110.170(a) (2019) (authorizing an ALJ to “make rulings on motions and objections”). Petitioner

acknowledges in his brief that this specific regulation “make[s] it clear that an ALJ may deny motions.” Thus, even if petitioner is right that the ALJ’s analysis of the statute-of-limitations issue presented was factually and legally erroneous, that does not mean that the ALJ or anyone else who may become involved with this disciplinary proceeding in the future lacks jurisdiction or adjudicative authority. See *Consolidated Freightways Corp.*, 305 Ill. App. 3d at 939 (“Implicit in the authority to decide an issue is the possibility that one might blunder. A blunder by an administrative agency in the normal exercise of its regulatory power is why we have the Administrative Review Law.”). Were it otherwise, the exception to the exhaustion-of-administrative-remedies doctrine would swallow the doctrine itself, and courts would be inundated with requests to review interlocutory administrative orders. Any error by the ALJ in ruling on petitioner’s motion to dismiss renders the challenged order “voidable rather than void,” so petitioner must “exhaust [his] administrative remedies prior to filing any action in the circuit court.” See *Northshore University Healthsystem*, 2017 IL App (1st) 153647, ¶ 27.

¶ 19 In arguing to the contrary, petitioner relies heavily on our supreme court’s decision in *Goral*, which involved officers employed by the sheriff of Cook County who were subject to administrative disciplinary proceedings. *Goral*, 2020 IL 125085, ¶ 1. Before the administrative tribunal entered a final judgment, the plaintiffs filed an action in the circuit court alleging that members of the tribunal were not appointed in accordance with statutory requirements. *Goral*, 2020 IL 125085, ¶ 1. In holding that the plaintiffs were not required to exhaust their administrative remedies before filing this civil action, the key aspect of the supreme court’s reasoning was that if the plaintiffs were correct that the administrative tribunal was “illegally comprised,” any decision the tribunal rendered “would be void.” *Goral*, 2020 IL 125085, ¶ 63. Indeed, the court noted that the issue was “not whether an order was correct but whether the agency had the authority to enter

any order at all.” *Goral*, 2020 IL 125085, ¶ 62.

¶ 20 Unlike in *Goral*, petitioner does not allege that the ALJ who is responsible for making recommendations regarding the 2022 disciplinary complaint lacks the authority to serve in an adjudicatory capacity. Rather, petitioner merely complains that the duly appointed ALJ erroneously rejected a statute-of-limitations defense. Petitioner’s claimed defense to the charges against him has no bearing on the agency’s authority to enter an order on his motion, so the reasoning of *Goral* does not apply here.

¶ 21 Because petitioner failed to exhaust his administrative remedies and no exception to that requirement applies, he was not entitled to seek *mandamus* relief. Accordingly, we affirm the orders entered by the trial court on September 30, 2024, and February 4, 2025. We express no opinion on how the statute of limitations applies to the facts at hand.

¶ 22 III. CONCLUSION

¶ 23 For the reasons stated, we affirm the trial court’s judgment.

¶ 24 Affirmed.