No. 131382

IN THE
SUPREME COURT OF ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,	)	On Appeal from the Appellate
	)	Court of Illinois, Fifth Judicial
Petitioner-Appellant,	)	District, No. 5-22-0651
	)	
	)	There on Appeal from the
v.	)	Circuit Court of the Sixth Judicial
	)	Circuit, Champaign County,
	)	Illinois, No. 21-CF-671
	)	
GERMAN CRUZ AGUILAR,	)	The Honorable
	)	Adam M. Dill
Respondent-Appellee.	)	Judge Presiding.

REPLY BRIEF OF PLAINTIFF-APPELLANT
PEOPLE OF THE STATE OF ILLINOIS

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ORAL ARGUMENT REQUESTED

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CYNTHIA A. GRANT
SUPREME COURT CLERK

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ARGUMENT

The People established in their opening brief that the circuit court erroneously dismissed defendant's charges for aggravated driving under the influence (DUI), *see* 625 ILCS 5/11-501(d)(1)(H). First, the People demonstrated that § 11-501(d)(1)(H)'s plain language prohibits defendant's alleged conduct of committing a DUI while his license was suspended. *See* Peo. Br. 6-11.[2] Second, the People explained that § 11-501(d)(1)(H) must be construed in accordance with its plain language and without resort to canons of construction such as the canon against surplusage, which is a guiding principle and not an absolute rule. *See id.* at 9-10. Finally, the People established that even if § 11-501(d)(1)(H)'s language were ambiguous, extrinsic tools of construction confirm that it prohibits defendant's conduct. *See id.* at 11-16.

In response, defendant offers no plain language argument at all. Instead, he invents a straw man, arguing that the People added the word "valid" into § 11-501(d)(1)(H). But in interpreting that subsection's plain text, the People never added that word; they merely applied the Vehicle Code definition of "driver's license" to the term "driver's license" in § 11-501(d)(1)(H) and established that defendant did not possess a driver's license

[2] The People's opening brief, defendant's brief, and the appendix to this brief are cited as "Peo. Br. __," "Def. Br. __," and "RA__," respectively. The remaining citations appear as they did in the People's opening brief. *See* Peo. Br. 1 n.1.

when he committed a DUI. *See id*. at 6-11. Offering no alternative definition to the term "driver's license," defendant merely repeats the surplusage argument endorsed by the appellate court and posits that the alleged ambiguity created by the surplusage canon should be construed in his favor. Again, the People's brief established that § 11-501(d)(1)(H)'s plain text must be enforced as written without resorting to any canons of construction. In any event, any ambiguity created by the surplusage canon is resolved by the legislative history, which establishes that the General Assembly meant what it said in § 11-501(d)(1)(H)'s plain text.

For these reasons, the Court should reverse the circuit court's judgment. Should the Court conclude that the dismissal was appropriate, however, it should modify the circuit court's judgment to dismiss the charges without prejudice, as required under 725 ILCS 5/114-1(e). In either circumstance, the Court should make clear that the circuit court may not rely on nonprecedential orders issued prior to January 1, 2021, and is bound by published appellate court opinions that have considered an issue, even if they did so in judicial dicta.

The Circuit Court Erred in Dismissing the Charges.

A. The Charges Properly Alleged that Defendant Committed Aggravated DUI when He Drove a Car while His License was Suspended.

The Court should reverse the circuit court's judgment dismissing defendant's aggravated DUI charges. Defendant's alleged conduct falls squarely within § 11-501(d)(1)(H)'s plain language. Even if application of the

surplusage canon creates ambiguity, other tools of construction confirm that the General Assembly intended § 11-501(d)(1)(H) to prohibit defendant's alleged acts of committing a DUI while his license was suspended.

1. The plain text of § 11-501(d)(1)(H) elevates DUI to aggravated DUI if the DUI is committed while a person's driver's license is suspended.

Defendant's charges properly alleged that he committed aggravated DUI under § 11-501(d)(1)(H) because he did not "possess a driver's license" while his license was suspended. Applying the Vehicle Code definition of "driver's license," the People established in their opening brief that a person who lacks permission to drive does not "possess a driver's license" under § 11-501(d)(1)(H)'s plain language. Peo. Br. 7-8. Then, applying the Vehicle Code definition of "suspension," the People further established that a person whose license is suspended does not have permission to drive. *Id.* at 8-9. Accordingly, the People demonstrated that § 11-501(d)(1)(H)'s plain language encompasses defendant's conduct because he allegedly committed a DUI while his license was suspended. *Id.* at 9.

Defendant offers no plain language argument at all. Instead, invents a straw man, arguing that the People added the word "valid" into § 11-501(d)(1)(H). *See* Def. Br. 9-12. But the People never added that word when interpreting the subsection's plain text. As discussed, they merely applied the Vehicle Code and dictionary definitions of "driver's license" and "suspension" to § 11-101(d)(1)(H). Under those definitions, the operative

phrase does not "possess a driver's license" encompasses both the circumstance when a person does not have permission to operate a motor vehicle and the circumstance when he does not have the physical card. *See* Peo. Br. 8. Thus, the Court need not add the word "valid" into the statute to interpret "possess a driver's license" as including both circumstances. *See People v. Rosenbalm*, 2011 IL App (2d) 100243, ¶ 10; *Gruchow v. White*, 375 Ill. App. 3d 480, 485 (4th Dist. 2007); *People v. Odumuyiwa*, 188 Ill. App. 3d 40, 44 (2d Dist. 1989); *People v. Sass*, 144 Ill. App. 3d 163, 170 (4th Dist. 1986).

Defendant's citation to statutory and administrative code provisions that add the word "valid" to modify "driver's license," *see* Def. Br. 11-12, does not alter this result. Contrary to defendant's suggestion, the lack of the modifier shows that the General Assembly intended "driver's license" to be broader, rather than narrower, in § 11-501(d)(1)(H). *See generally United States v. Gonzales*, 520 U.S. 1, 5 (1997) (lack of modifier or other limiting language shows that Congress intended to be more inclusive); *People v. Turner*, 2024 IL App (4th) 230641, ¶¶ 38-39 (similar). And omission of the word "valid" does not change the plain meaning of the phrase "possess a driver's license."

Nor does omission of the word "valid" imply that suspended licenses are not covered by § 11-501(d)(1)(H). *See* Def. Br. 10-11. As the People established in their opening brief, defendant did not possess permission to

drive while his license was suspended because the Secretary of State had withdrawn that permission and, upon suspension, he had no legal right to possess even the physical card. *See* Peo. Br. 8-9; *Rosenbalm*, 2011 IL App (2d) 100243, ¶ 10; *see also People v. Romanowski*, 2016 IL App (1st) 142360, ¶¶ 8, 37 (defendant convicted under § 11-501(d)(1)(H) for committing DUI while his license was suspended).

Tellingly, defendant's primary argument rests not on the plain meaning of § 11-501(d)(1)(H)'s actual language, but on application of the surplusage canon. But as the People's opening brief established, the surplusage canon is merely a canon of construction that, like all canons, serves as a guide to statutory construction and is not an absolute rule. Peo. Br. 9-11. And here, not only is § 11-501(d)(1)(H)'s language clear but the appellate court has long interpreted it as encompassing suspended licenses, and the legislature has acquiesced in that construction by not amending the statute in the ensuing decades. *See id.* at 7-8, 10-11. Moreover, as discussed in § A.2.ii, *infra*, this construction is consistent with the General Assembly's overarching intent to elevate DUI to aggravated DUI when a person lacks permission to drive, regardless of the reason for the lack of permission.

Contrary to defendant's suggestion, Def. Br. 16-17, longstanding consensus in the appellate court precedent can settle the provision's meaning, as "the legislature is presumed to act with full knowledge of the prevailing case law and the judicial construction of the words in the prior enactment."

People v. Villa, 2011 IL 110777, ¶ 36 (citing appellate court decisions as settling meaning of "pursuant to the rules of evidence of criminal trials"); *see also People v. Young*, 2011 IL 111886, ¶¶ 12, 16 (citing two appellate court decisions as settling the meaning of "schools" in the Controlled Substances Act). Thus, unlike in *People v. Simpson*, 2015 IL 116512, ¶¶ 31-32, *see* Def. Br. 10-11, construing § 11-501(d)(1)(H)'s language in accordance with its plain language is consistent with, not contrary to, longstanding appellate court precedent.

In sum, § 11-501(d)(1)(H)'s text unambiguously covers defendant's alleged conduct and the Court's analysis need not go any further. *Simpson*, 2015 IL 116512, ¶ 30.

2. Extrinsic tools of statutory construction confirm that § 11-501(d)(1)(H) bars defendant's charged conduct.

Even if application of the surplusage canon renders the language of § 11-501(d)(1)(H) susceptible to two reasonable interpretations and therefore ambiguous, as defendant argues, *see* Def. Br. 13, the People's opening brief established that other extrinsic tools of statutory interpretation confirm that the General Assembly intended that the provision apply to defendant's alleged conduct, *see* Peo. Br. 12-14. And because any ambiguity is easily resolved by these other tools, the rule of lenity does not apply.

i. The legislative history confirms that the General Assembly intended § 11-501(d)(1)(H) to apply to defendant's charged conduct.

The legislative history demonstrates that the General Assembly intended § 11-501(d)(1)(H) to apply to persons who commit a DUI while their licenses are suspended. As the People's opening brief established, *see* Peo. Br. 12, when the provision was enacted, legislators understood that it would apply to drivers who no longer possessed a license due to suspension, *see* 94th Gen. Assem., House Proceedings, Mar. 10, 2005, at 44 (bill sponsors explaining that §11-501(d)(1)(H) penalizes individuals who drive under the influence with "no valid driver's license"); 94th Gen. Assem., Sen. Proceedings, May 18, 2005, at 56 (same); *see also* Pub. Act. 94-329 (adding § 11-501(d)(1)(H)).

Defendant relies on a later amendment effectuated by Public Act 95-578, which moved the language in § 11-501(c-1)(1) to what is now § 11-501(d)(1)(G), and argues that this change "indicat[es]" that subsections (G) and (H) were intended to have "separate meanings." Def. Br. 16. But defendant disregards the full legislative history and the reasons for the change.

Section 11-501(d)(1)(H) was passed during a three-year period in which the General Assembly passed six different and inconsistent versions of § 11-501, in eight public acts. *See* Larry A. Davis, *Demystifying Illinois DUI Sentencing*, 97 Ill. B.J. 352, 353 (2009). During this period, the General

Assembly added subsection (d)(1)(H) with the intent that it apply to any DUI offender who does not possess a valid driver's license, *see id.*; 94th Gen. Assem., House Proceedings, Mar. 10, 2005, at 44; 94th Gen. Assem., Sen. Proceedings, May 18, 2005, at 56, but overlooked that subsection (c-1)(1) also aggravated a narrower category of DUIs committed with a suspended license. *See* Pub. Act 94-329(c-1)(1); *Rosenbalm*, 2011 IL App (2d) 100243, ¶ 12. Later, the General Assembly accidentally omitted § 11-501(d)(1)(H) altogether, *see People v. Gonzalez*, 388 Ill. App. 3d 1003, 1004 (3d Dist. 2009); Davis, *supra* at 355; Pub. Act 94-609, but later reinserted the subsection without denoting it as added text, Pub. Act 94-963. Later still, the General Assembly reorganized § 11-501 to move all aggravated DUIs, including subsection (c-1)(1), into subsection (d). *See* Pub. Act. 95-578 (subsection (c-1)(1)'s language moves to subsection (d)(1)(G), without any substantive change); Peo. Br. 13.

During the many amendments to § 11-501(d)(1)(H) over this three-year period, the General Assembly focused on defining the class of felony for those convicted of a third or subsequent DUI, Davis, *supra* at 353, not on the apparent overlap that was created between now subsections (G) and (H). In other words, there is no evidence that the General Assembly intended to make any substantive change to its understanding that subsection (H) applies to DUI offenders who "did not have a valid driver's license." Davis, *supra* at 353; 95th Gen. Assem., Sen. Proceedings, May 10, 2007, at 39

("[Pub. Act 95-578] [is] just a recodification, not any substantive changes."); 94th Gen. Assem., House Proceedings, Mar. 10, 2005, at 44 (now § 11-501(d)(1)(H) prohibits DUIs with "no valid license"); 94th Gen. Assem., Sen. Proceedings, May 18, 2005, at 56 (same). Therefore, defendant is incorrect that the General Assembly intended subsection (G) "to be the exclusive list of suspensions and revocations the elevate the DUI to a Class 4 Felony" and that subsection (H) exclude suspensions and revocations. Def. Br. 16.

Accordingly, as the People's opening brief demonstrated, the legislative history confirms that the surplusage was mere oversight and does not suggest an alternative meaning for § 11-501(d)(1)(H). *Rosenbalm*, 2011 IL App (2d) 100243, ¶ 12. The General Assembly therefore intended § 11-501(d)(1)(H) to apply to individuals who, like defendant, commit DUI while driving on a suspended license.

ii. Interpreting § 11-501(d)(1)(H) in accordance with its plain language avoids absurd results.

The People's opening brief further established that construing § 11-501(d)(1)(H) consistent with its plain language avoids absurd results. *See* Peo. Br. 14-16. Limiting § 11-501(d)(1)(H) to circumstances where the person has never obtained a license in Illinois, *see* Def. Br. 18, results in aggravating DUI only for those offenders who *never* possessed a license but not those whose subsequent unlawful actions caused their licenses to be suspended or revoked, *see Rosenbalm*, 2011 IL App (2d) 100243, ¶ 9. Not only does this construction belie common sense, but it is also inconsistent with the Vehicle

Code's general treatment of suspensions and revocations as more serious offenses. *Compare* 625 ILCS 5/6-303(a) (driving with suspended or revoked license is Class A misdemeanor) *with id.* §§ 6-101, 6-606(c) (driving when never issued a license is Class B misdemeanor); *cf. Odumuyiwa*, 188 Ill. App. 3d at 44 (comparing cancelation due to a procedural error with suspension, and explaining that "[a] suspension generally applies to situations where the driver has committed a relatively serious offense warranting the suspension of his privilege to drive").

Defendant's responses disregard that the absurd result stems not from the specific punishments that attach to driving while a license is expired or with a temporary visitor's driver's license without liability insurance, *see* Def. Br. 17-18, but from the General Assembly's intent that suspensions and revocations are generally treated more seriously than other grounds on which the State may withdraw the privilege to drive, *e.g.*, expiration or cancelation. The absurdity is that defendant's interpretation would aggravate a DUI for individuals who have never been issued a license but not for those whose unlawful actions cost them their licenses, as is the case here. Furthermore, the fact that driving with an expired license is punished equally to driving without ever having been issued a license, as defendant observes, Def. Br. 18, reinforces the conclusion that the General Assembly intended that committing a DUI with an expired license or while never having been issued a license should also be treated equally.

Furthermore, aggravating all instances where a person commits a DUI when the State has never given him the privilege to drive or has withdrawn that privilege is not only consistent with § 11-101(d)(1)(H)'s plain language but also aligns with the General Assembly's overarching intent to aggravate all DUIs committed when the driver lacks the privilege to drive. Defendant's interpretation, however, limits application of the aggravator to only one circumstance — driving without ever having been issued a license — conduct that, as explained, the Vehicle Code treats less seriously than driving with a suspended or revoked license. *Cf. People v. Hoffman*, 2025 IL 130344, ¶ 37 (rejecting an interpretation that "extend[s] the same sentencing grace to a defendant who merely possesses drugs and a defendant whose actions lead to someone's death"). And although defendant attempts to minimize the reason for *his* suspension, Def Br. 18 ("suspended because of an unpaid financial obligation"), as explained in the People's opening brief, defendant's license was suspended because he was a "problem driver[ ]" who failed to comply with Illinois's financial responsibility insurance requirement, Peo. Br. 3.[3]

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[3] Although it is not in the record, the Court may take judicial notice of defendant's driving record abstract, a public record. *See Johnson v. Ames*, 2016 IL 121563, ¶ 7 (this Court "may take judicial notice of public records"); *People v. Minor*, 197 Ill. App. 3d 500, 502 (4th Dist. 1990) (driving record abstract is public record because Secretary of State "is required to prepare abstracts for the courts, public defenders, and other officials"); *see also Driving Record Abstracts*, Office of the Ill. Sec'y of State, https://www.ilsos.gov/departments/drivers/drivers-license/purchaseabstract.html. Defendant's driving record, provided in the appendix to this brief, shows that he had a history of driving infractions before his license was suspended: (1) he was in two collisions, one involving personal injury and the

Defendant is also incorrect that considering the consequences that would result from construing the statute one way or the other in light of other provisions of the Vehicle Code resurrects the now defunct cross-comparison test for addressing a challenge to a sentence under the proportionate penalties clause, Ill. Const. 1970, art. I, § 11. *See* Def. Br. 18-19. This Court routinely evaluates the consequences of one interpretation of a statute over another, in conjunction with the overall purpose of the entire statutory scheme, including the evils to be remedied. *See State ex rel. Raoul v. Elite Staffing, Inc.*, 2024 IL 128763, ¶ 16. Indeed, the Court recently compared the relative seriousness of various offenses based on their punishments to resolve whether the General Assembly intended that a particular statutory provision be interpreted broadly or more narrowly. *See Hoffman*, 2025 IL 130244, ¶¶ 37-41. In short, defendant does not raise a proportionate penalties challenge, and the issue here is one of statutory construction, which necessarily requires the Court to consider, in light of the entire statutory scheme, whether one interpretation of the statute will yield unintended consequences. And here, defendant's interpretation of § 11-501(d)(1)(H) as applying only to the limited circumstances where the person has never obtained a license in Illinois would produce absurd results and should therefore be rejected.

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other involving his speeding resulting in property damage; (2) he operated a motor vehicle without insurance; and (3) he was charged with reckless driving. RA1.

iii. The rule of lenity does not apply.

Nor does the mere existence of a statutory ambiguity suffice to apply the rule of lenity here. Def. Br. 14-15; *see generally Smith v. United States*, 508 U.S. 223, 239 (1993). "The rule of lenity applies only if, after seizing everything from which aid can be derived, [this Court] can make no more than a guess as to what [the legislature] intended." *People v. Gutman*, 2011 IL 110338, ¶ 43 (cleaned up). Thus, the rule applies only where there is a "'grievous ambiguity'" in the statute. *Hoffman*, 2025 IL 130344, ¶ 47.

Defendant fails to satisfy this standard. For the reasons discussed above, the Court need not "guess" as to what the General Assembly intended. *Gutman*, 2011 IL 110338, ¶ 43. Section 11-501(d)(1)(H)'s plain text applies to defendant's conduct. Any ambiguity arises only if the canon against surplusage is applied. And that ambiguity is easily resolved by reviewing the legislative history — which shows that the General Assembly intended the provision to apply to defendant's conduct — and considering the absurd consequences that would result from limiting § 11-501(d)(1)(H) as defendant requests. *See United States v. R.L.C.*, 503 U.S. 291, 305-06 (1992) ("[W]e have always reserved lenity for those situations in which a reasonable doubt persists about a statute's intended scope even *after* resort to 'the language and structure, legislative history, and motivating policies' of the statute.") (quoting *Moskal v. United States*, 498 U.S. 103, 108 (1990)) (emphasis in original). In sum, there is no "grievous ambiguity" in the statute, so the rule

of lenity does not apply. *Hoffman*, 2025 IL 130344, ¶ 47. The Court should therefore reverse the judgments of courts below and reinstate defendant's charges.

B. If the Court Holds that Defendant Could Not be Charged under § 11-501(d)(1)(H), It Should Modify the Circuit Court's Judgment to Dismiss the Charges without Prejudice.

If the Court were to conclude that § 11-501(d)(1)(H) does not apply to defendant's alleged conduct, it should modify the circuit court's judgment to dismiss defendant's charges without prejudice. By statute, a dismissal of charges under 725 ILCS 114-1(a)(8) must be without prejudice. *See* 725 ILCS 5/114-1(e) ("Dismissal of the charge upon the grounds set forth in subsections (a)(4) through (a)(11) of this Section shall not prevent the return of a new indictment or the filing of a new charge."). Therefore, the circuit court lacked authority to dismiss the charges with prejudice. *People v. Whitfield*, 228 Ill. 2d 502, 522 (2007), *as modified on denial of reh'g* (Apr. 23, 2008) ("Courts have no legislative powers; courts may not enact or amend statutes") (cleaned up). Accordingly, this Court should exercise its supervisory authority to modify the circuit court's judgment to comport with the statute. *See People ex rel. Birkett v. Bakalis*, 196 Ill. 2d 510, 513 (2001) (this Court has supervisory power to "keep an inferior tribunal from acting beyond the scope of its authority").

Contrary to defendant's contention, the Court may exercise its supervisory authority to ensure that the circuit court's judgment comports

with the statute, regardless of any forfeiture, waiver, or even concession by a party. *See generally McDunn v. Williams*, 156 Ill. 2d 288, 301-03 (1993) (describing breadth of supervisory authority). Indeed, this Court has overlooked procedural hurdles when necessary to further "the interests of justice." *People v. Guy*, 2025 IL 129967, ¶¶ 61, 72. Accordingly, should the Court hold that defendant's charges should be dismissed, it should modify the circuit court's judgment to dismiss the charges without prejudice.

C. The Circuit Court Lacked Authority to Depart from *Rosenbalm*.

As the People's opening brief established, the circuit court lacked authority to depart from *Rosenbalm*, which interpreted § 11-501(d)(1)(H)'s language as applying to circumstances where "the person's permission, *i.e.*, license, was revoked, suspended, or expired." 2011 IL App (2d) 100243, ¶ 10; *see* Peo. Br. 17-18. Defendant responds that the circuit court was not bound by *Rosenbalm*'s judicial dicta because *Rosenbalm*'s interpretation conflicts with the statute's plain language, so the circuit court had discretion to merely afford the decision weight but not deference. Def. Br. 21 (citing *Paper Source LLC v. Sugar Beets, Inc.*, 2025 IL App (1st) 231878, ¶ 27). Defendant is mistaken.

To start, *Rosenbalm*'s interpretation does not conflict with § 11-501(d)(1)(H)'s plain text. *See supra* § A.1. But even if it did, the circuit court is bound by the appellate court's construction of a statute where this Court has not considered the question. *See People v. Webb*, 2023 IL 128957, ¶ 34

(circuit court bound to follow governing precedent on legal questions); *People v. Lighthart*, 2023 IL 128398, ¶ 75 (until this Court says otherwise, appellate court decisions are binding on circuit court). Defendant does not dispute that *Rosenbalm*'s construction of the statute was judicial dictum. *See* Def. Br. 22; A6-7, ¶ 16; *see LeBron v. Gottlieb Mem. Hosp.*, 237 Ill. 2d 217, 236 (2010) ("'where a decision rests on two or more grounds, none can be relegated to the category of obiter dictum'") (quoting *Woods v. Interstate Realty Co.*, 337 U.S. 535, 537 (1949)). And "[j]udicial dicta have the force of a determination by a reviewing court and should receive dispositive weight in an inferior court." *People v. Williams*, 204 Ill. 2d 191, 206 (2003). Accordingly, because the circuit court is inferior to the appellate court, it lacked discretion to reinterpret § 11-501(d)(1)(H) after the appellate court had already done so in *Rosenbalm*. *See id.*

Paper Source, cited by defendant, *see* Def. Br. 22, is inapposite. There, the appellate court evaluated the scope of an implied contract, not a statute. *Paper Source*, 2025 IL App (1st) 231878, ¶ 25. And the appellate court merely distinguished a prior appellate court decision when interpreting the implied contract in that case. *Id.* ¶¶ 25-26. In sum, *Paper Source* is inapposite to a circuit court's authority to depart from the appellate court's interpretation of a statute.

Accordingly, the Court should remind circuit courts that they must follow binding appellate court precedent.

CONCLUSION

The People of the State of Illinois respectfully request that this Court reverse the judgment of the appellate and circuit courts and reinstate defendant's charges. Alternatively, the People request that the Court modify the circuit court's judgment to dismiss the charges without prejudice.

March 10, 2026

Respectfully submitted,

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RULE 341(c) CERTIFICATE OF COMPLIANCE

I certify that this brief conforms to the requirements of Rules 341(a) and (b). The length of this brief, excluding the pages containing the Rule 341(d) cover, the Rule 341(h)(1) table of contents and statement of points and authorities, the Rule 341(c) certificate of compliance, the certificate of service, and those matters to be appended to the brief under Rule 342(a), is 17 pages.

/s/ Rachel Miklaszewski
RACHEL MIKLASZEWSKI
Assistant Attorney General

CERTIFICATE OF FILING AND SERVICE

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct. On March 10, 2026, the foregoing **Reply Brief of Plaintiff-Appellant People of the State of Illinois** was filed with the Clerk of the Supreme Court of Illinois, using the Court's electronic filing system, which provided service to the following:

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APPENDIX

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COURT PURPOSES C622-2868-7139-0 05500

05 13 21 DDL: Y

PURSUANT TO THE PROVISIONS OF THE ILLINOIS VEHICLE CODE THE FOLLOWING INFORMATION IS FURNISHED FROM THE DRIVERS LICENSE FILE OF THE PERSON IDENTIFIED ABOVE

C622-2868-7139-0

GERMAN FABIAN CRUZ AGUILAR
3918 W MONTROSE AVE FL 1
CHICAGO 60618

CONT LIC DATE	ISSUE DATE	BIRTH DATE
02 19 20	02 19 20	05 15 87

GENDER	HEIGHT	WEIGHT	HAIR	EYES	D.E.	CDL	TL	CLASS	ENDORS	MC	RESTRICTION	EXPIRATION DATE
M	5 05	160	BLK	BRN		V	1	D		X	NONE	02 19 23

TYPE ACTION		STOP IN EFFECT
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	CMV=N HZ=N CDL=N	
	DRIVING DURING A SUSPENSION/REVOCATION	
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	OPERATING WHILE DRIVING PRIVILEGES WERE SUSPENDED	
94	CONVICTION ARR-DT 09-13-13 DISP-DT 10-16-13 OFFENSE 6 101 00	
	TIC-NO=YW339440 DOC LOC NO= IL-COURT=COOK - 4TH	
	CMV=N HZ=N CDL=N	
	DRIVING WITHOUT VALID LICENSE OR PERMIT	
03	SUSPENSION EFF-DT 11-04-13 TERM-DT 05-04-14 OFFENSE 6 206 A19	NO
	OPERATING A MOTOR VEHICLE WITHOUT A VALID LICENSE OR PERMIT	
05	SUSPENSION EFF-DT 12-15-06 TERM-DT 11-16-16 SR22 INSURANCE REQUIRED	NO
	FINANCIAL RESPONSIBILITY INSURANCE SUSPENSION	
71	ISS-DT 12-15-16 EXP-DT 03-15-17 PERMIT-NO= HS1839	
71	ISS-DT 12-15-16 EXP-DT 03-15-17 PERMIT-NO= HS1872	
19	ACCIDENT ACC-DT 11-10-17 ACC-NO= 201701299703 CMV=N HZ=N	
	COLLISION INVOLVING PERSONAL INJURY	
71	ISS-DT 02-15-19 EXP-DT 05-16-19 PERMIT-NO= CN5803	
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	DRIVERS LICENSE ISSUED	
71	ISS-DT 02-19-20 EXP-DT 05-19-20 PERMIT-NO= CN1434	
47	SR22 REQ DATE 12-21-20 MANDATORY INSURANCE OFFENSE	
	FINANCIAL RESPONSIBILITY INSURANCE REQUIRED	
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	FINANCIAL RESPONSIBILITY INSURANCE SUSPENSION	
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	COLLISION INVOLVING PROPERTY DAMAGE	
	SUSPENSION WAS IN EFFECT ON 04-30-2021	
	* END OF RECORD *	

* This official record is received directly from the Secretary of State's Office via computer link-up system. This is to certify, to the best of my knowledge and belief, after a careful search of my records, that the information set out herein is a true and accurate copy of the captioned individual's driving record; identified by driver's license number, and I certify that all statutory notices required as a result of any driver control actions taken have been properly given.

Jesse White
SECRETARY OF STATE

(Form DSDASC - Rev. 8/24/2011)

COURT PURPOSES

C622-2868-7139-0 05500

05 13 21 DDL: Y

PURSUANT TO THE PROVISIONS OF THE ILLINOIS VEHICLE CODE THE FOLLOWING INFORMATION IS FURNISHED FROM THE DRIVERS LICENSE FILE OF THE PERSON IDENTIFIED ABOVE

C622-2868-7139-0

GERMAN FABIAN CRUZ AGUILAR
3918 W MONTROSE AVE FL 1
CHICAGO 60618

CONT LIC DATE	ISSUE DATE	BIRTH DATE
02 19 20	02 19 20	05 15 87

GENDER	HEIGHT	WEIGHT	HAIR	EYES	D.E.	CDL	TL	CLASS	ENDORS	MC	RESTRICTION	EXPIRATION DATE
M	5 05	160	BLK	BRN		V	1	D		X	NONE	02 19 23

TYPE ACTION	STOP IN EFFECT

SUSPENSION WAS IN EFFECT ON 04-30-2021
* END OF RECORD *

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Jesse White
SECRETARY OF STATE

(Form DSDASC - Rev. 8/24/2011)

SUPERVISION

C622-2868-7139-0 05500

05 13 21 DDL: Y

PURSUANT TO THE PROVISIONS OF THE ILLINOIS VEHICLE CODE THE FOLLOWING INFORMATION IS FURNISHED FROM THE DRIVERS LICENSE FILE OF THE PERSON IDENTIFIED ABOVE

C622-2868-7139-0

GERMAN FABIAN CRUZ AGUILAR
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CONT LIC DATE	ISSUE DATE	BIRTH DATE
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M	5 05	160	BLK	BRN		V	1	D		X	NONE	02 19 23

TYPE ACTION | STOP IN EFFECT

THIS ADDITIONAL SUPERVISION INFORMATION IS BEING
PROVIDED IN ACCORDANCE WITH SECTION 6-204 OF THE
ILLINOIS VEHICLE CODE AND IS SUBJECT TO THE
LIMITATIONS CONTAINED THEREIN.

55 SUPERVISION ARR-DT 08-26-20 SUP-DT 09-21-20 OFFENSE 3 707
TIC-NO=2735 IL COURT=CLINTON CMV=N HZ=N CDL=N
VIOLATION OF OPERATING UNINSURED MOTOR VEHICLE
55 SUPERVISION ARR-DT 11-23-20 SUP-DT 03-29-21 OFFENSE 1 0601 00
TIC-NO=28362 IL COURT=RANDOLPH CMV=N HZ=N CDL=N
SPEEDING TOO FAST FOR CONDITIONS

* END OF RECORD *

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Jesse White
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(Form DSDASC - Rev. 8/24/2011)