

2026 IL App (1st) 251653-U

Nos. 1-25-1653

Order filed September 22, 2026
Modified upon denial of rehearing October 20, 2026

SECOND 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 JUDICIAL DISTRICT

<i>In re</i> MARRIAGE OF ANATOLII MASLII,	)	Appeal from the Circuit Court of
	)	Cook County.
Petitioner-Appellee,	)	
	)	No. 2022 D 003121
v.	)	
	)	Honorable
NINA IVANOVA,	)	Patricia M. Fallon,
	)	Judge, presiding.
Respondent-Appellant.	)	

PRESIDING JUSTICE D.B. WALKER delivered the judgment of the court.
Justices McBride and Van Tine concurred in the judgment.

ORDER

¶ 1 *Held:* We affirm the circuit court's July 25, 2025 vacatur of Ivanova's order of protection against Maslii. We lack jurisdiction to review any of the other orders appealed.

¶ 2 Respondent Nina Ivanova (Ivanova) appeals several orders entered in the underlying dissolution of marriage case initiated by her husband, Anatolii Maslii (Maslii). Ivanova alleges numerous errors related to circuit court orders making an indirect civil contempt finding, evicting her from the marital home, deeding sole ownership of the home to Maslii

for the purposes of sale, and barring Ivanova from involvement in the court-ordered sale of the home. We affirm the circuit court’s July 25, 2025 order vacating Ivanova’s order of protection, but we lack jurisdiction to review the other issues raised.

¶ 3

I. BACKGROUND

¶ 4

Ivanova and Maslii were married in Ukraine on July 10 of either 2016 or 2017. Both parties submitted documents showing both years, but the initial petition for dissolution listed July 10, 2017. Which date is accurate has no bearing on our analysis. The two, along with Ivanova’s daughter from a previous marriage, emigrated to the United States and purchased a home in Rolling Meadows, Illinois (marital home). Maslii filed for dissolution of the marriage on April 18, 2022, stating that the two had been separated since August 2021. During the pendency of the dissolution petition, Ivanova obtained a plenary order of protection against Maslii on January 30, 2023, as part of a criminal domestic violence case against him. The order of protection, which granted Ivanova exclusive possession of the marital home, was extended through June 30, 2025, after Maslii was convicted.

¶ 5

On August 3, 2023, Maslii moved to sell the marital home, stating that he could no longer pay the full cost of the marital home’s mortgage, taxes, and other expenses due to a downturn in his business. As Ivanova was unemployed and had no income to put toward those expenses, Maslii’s inability to pay would eventually result in foreclosure and diminishment of the marital estate. The circuit court granted the motion on September 27, 2023, appointing Debbye Tyler (Tyler) as the listing agent for the sale. The order required that the home be listed by October 18, 2023.

¶ 6

On February 20, 2024, Maslii filed an “Emergency Motion Against [Ivanova] for Compliance with Court Orders & Sanctions,” in which he alleged that Ivanova was willfully

interfering with the sale of the marital home by “hav[ing] excuses as to why [the home] cannot be shown on weekends or during certain times when the agent is available and willing to show the property,” as well as “attempting to block the sale by changing the agreed upon listing price for the property.” Tyler signed an affidavit on February 27, 2024, averring that Ivanova “made continued efforts to complicate and obstruct the sales process * * * includ[ing] denying cash offers, refusing to cooperate with [Tyler’s] recommendations regarding the sales process and closing, failing to provide immediate responses to offers for the marital home, blocking weekend showing dates and times, refusing to sign offer sheets[,] and by presenting unreasonable sales terms for the [marital home].” Ivanova denied those allegations.

¶ 7 On April 3, 2024, Maslii filed a second emergency motion urging sanctions against Ivanova. In it, he asserted that Ivanova was informed by the court, during a March 5, 2024 hearing, that April 15, 2024 was a reasonable closing date. Maslii alleged that Ivanova had “completely obstructed the sales process by altering sales terms on contracts without authorization, by dismissing [Maslii’s] comments and suggestions, and by failing to cooperate or communicate effectively with [Tyler].” Additionally, Ivanova filed an ethics complaint against Tyler. Maslii stated that Tyler nonetheless “produced multiple current offers for the subject property which have been accepted by [Maslii] but denied by [Ivanova]. Ivanova largely denied the allegations and asserted that the difficulties in selling the home were the result of Maslii’s insistence on an earlier closing date. Ivanova also confirmed that she did file an ethics complaint against Tyler because she learned by way of a postcard from a prospective buyer that there was an offer of which she had not been informed. When she emailed Tyler about this offer, Tyler expressed confusion as to why Ivanova would have

been interested in the indicated offer, as it was a lower offer than the cash offer that was pending at that time. On June 12, 2024, Tyler was reprimanded by the Mainstreet Organization of Realtors for violating her ethical obligations by failing to inform either Ivanova or Maslii of at least one offer.

¶ 8 On May 22, 2024, Maslii filed yet another motion for contempt, repeating previous allegations and adding that Ivanova had failed to comply with the court's April 16, 2024 order that stated: "Parties shall cooperate with all aspects of the sale, including leaving all fixtures, allowing any appraisals and inspections, signing all necessary documents, and appearing at the closing." Furthermore, Maslii stated that "the court-appointed real estate attorney for the parties sent email correspondence to all parties indicating that [Ivanova] does not intend to proceed with the sale and has refused to sign the required Alta Statement and Deed" despite there allegedly being a closing scheduled for May 31, 2024. The court entered an order on May 24, 2024, setting the motion for hearing May 28, 2024 and ordering Ivanova to sign "all real estate documents (including the ATLA statement and Deed) by the close of business on 5/24/24." Ivanova's attorney moved to withdraw the same day.

¶ 9 On May 28, 2024, Ivanova filed an "Emergency Motion for Substitution of a Judge for Cause," in which she alleged that the presiding judge misapplied the law and "demonstrate[d] open sympathy towards [Maslii]." The same day, Ivanova filed an "Emergency Motion to Execute the First Right to Buy Out [Maslii's] Interest in the Marital Property Due to [Maslii's] Dissipation of the Marital Assets, to Modify the Court Order to Sell the Marital Residence, and to Allow [the] Termination of the Sales Process." In it, she reiterated her intention, first noticed on May 22, 2024, to assert a claim that Maslii had dissipated marital assets, and she asserted, without reference to authority, that she should be granted the first

right to buy out Maslii's interest in the property because it would be "equitable and just." The motion expressed the intention to "buy out the marital property * * * at the expense of part of the dissipation amount," which she claimed amounted to \$502,342.51. Ivanova was given three weeks to find replacement counsel or file a *pro se* appearance. Her motion for substitution of judge was denied June 21, 2024 for failure to show actual prejudice or a high risk of actual bias.

¶ 10 On July 3, 2024, Maslii filed another motion for civil contempt, in which he once again decried Ivanova's continuing non-cooperation with the process of selling the home. He asserted that Ivanova did not comply with the order to sign the sale documents on May 24, 2024. He further stated that Tyler provided a new real estate contract on June 28, 2024, but Ivanova non-specifically objected to it. Ivanova's response stated that she had informed Tyler of her intention to buy out Maslii's interest in the home, as well as her intent to terminate the listing agreement because of Tyler's ethical violations. On July 15, 2024, Ivanova filed a motion to terminate the listing agreement with Tyler.

¶ 11 On July 29, 2024, the court entered an order ruling on Maslii's July 3, 2024 motion for contempt. This order is the oldest of the orders now appealed by Ivanova. The circuit court acknowledged that Ivanova was pursuing a claim of dissipation related to, among other things, Maslii having taken out a home equity line of credit (HELOC) on the marital home. The court found that Ivanova's prior conduct was "an attempt to thwart the sale of the marital residence," and that such conduct was willful and contemptuous. The court found Ivanova to be in contempt of court (though it did not specify the type of contempt) and barred her from involvement in the sale of the home.

¶ 12 The court noted in its order that it had been informed that there was yet another buyer for the home. It found that, given Maslii's difficulties paying the mortgage on the home, exigent circumstances existed that warranted injunctive relief under section 501 to facilitate the sale of the marital home. That injunctive relief took the form of a judicial deed assigning full ownership of the home to Maslii "to enable [him] to continue with the sale of the residence."

¶ 13 On September 16, 2024, Maslii moved to temporarily evict Ivanova. He alleged that he informed Ivanova that "a closing was scheduled for September 13, 2024, and that she would need to vacate the property in accordance with the real estate contract signed by all parties," and that she failed to do so. A new closing date was set for September 30, 2024. The court continued the motion to October 24, 2024 to give Ivanova time to respond. Ivanova denied the allegations and argued that she need not vacate the home because the criminal order of protection allowed her exclusive possession of the home through June 30, 2025. The court granted Maslii's motion to temporarily evict Ivanova on February 3, 2025, stating that her removal was seemingly necessary to successfully sell the home. Since she was already scheduled to start dental school on February 10, 2025 in Alton, Illinois, the court set February 9, 2025 as the date by which she was to vacate the premises. The court stated that failure to do so would prompt the court to "consider the termination of temporary maintenance, contempt, or other sanctions against [Ivanova]."

¶ 14 Maslii filed a combined motion to enforce the eviction order and rule to show cause on February 20, 2025, informing the court of Ivanova's failure to comply and urging she be removed from the home and found to be in contempt of court. The court set a briefing schedule on the motion and a hearing for May 5, 2025. Ivanova argued in her response that evictions are limited to tenants and landlords (as opposed to spouses), that she could not be

evicted because she had exclusive possession of the home pursuant to the criminal order of protection, and that a motion to reconsider the eviction order was still pending and therefore the order was not final. The motion was heard July 3, 2025. The court entered an order the same day granting the eviction enforcement order against Ivanova, and ordered the Cook County Sheriff to remove her from the home. The court acknowledged that Ivanova had assured it that she had in fact moved to Alton in February.

¶ 15 On July 21, 2025, Ivanova filed for an emergency order of protection against Maslii, alleging that on July 16, 2025, she was “at home” when Maslii entered without invitation or notification, frightening her, her daughter, and the neighbor who was visiting. She called 911 and the Rolling Meadows Police Department responded. The police instructed Maslii to leave “because he was harassing [Ivanova].” Although Maslii stated “he could do whatever he wanted,” he ultimately left “because he has a separate residence.” The order of protection was granted. Maslii moved to vacate it on July 23, 2025, noting that Ivanova had appeared in criminal court on July 21 to request an extension of the order of protection that expired June 30, 2025, and filed the motion for an emergency civil order of protection after that request was denied. Ivanova’s response asserted that the eviction order was void *ab initio*, and that although she was required to have a residence in Alton due to her school’s requirements, that did not mean she had abandoned the marital residence.

¶ 16 The circuit court vacated the order of protection on July 25, 2025, noting that Ivanova “lied to the court on multiple occasions and failed to inform [the new judge handling the case] that she was previously evicted by multiple court orders and that a pending eviction Order for her removal had been placed with the Cook County Sheriff. Further, [Ivanova] filed a fraudulent emergency order of protection with the Court and lied to the Court about

her residence in Alton, Illinois.” The order reiterated that the eviction order of July 3, 2025 would remain in place and Ivanova was to vacate the premises immediately. The court explicitly stated that Maslii was “legally authorized and permitted to enter and occupy” the marital home, and was authorized to remain at the premises starting July 28, 2025. The court further ordered:

“In the event that [Ivanova] is found to be at the subject premises on July 28, 2025, or thereafter, this Court will enter a remand Order against [Ivanova] to facilitate her placement into custody with the Cook County Sheriff for her continued violation of the eviction Orders that have been entered against her in this case.”

¶ 17 Ivanova filed an emergency motion to reconsider the July 25, 2025 order on July 28, 2025. On July 30, 2025, the court found that the matter did not qualify as an emergency and invited Ivanova to file the matters on the court’s regular motion call. There is no indication in the record that she ever did so.

¶ 18 On August 11, 2025, Ivanova filed a “Notice of Compliance with February 3, 2025, July 3, 2025, and July 25, 2025 Eviction Orders – Under Protest and Without Waiver of Rights.” In it, she stated that although she believed the eviction order and the subsequent enforcement order to be void, she “vacated the premises on December 20, 2024, relocating to Alton, Illinois.” The notice does not explain her continued presence in the marital home as of July 16, 2025.

¶ 19 Ivanova filed a notice of appeal on August 25, 2025, and this appeal follows.

¶ 20 II. ANALYSIS

¶ 21 Maslii did not file an appellate brief, so we review this matter on Ivanova’s *pro se* appellant brief only. Ivanova raises numerous claims of error related to the circuit court’s

July 29, 2024 order holding her in contempt and enjoining her from participating in the sale of the marital home, as well as with regard to the eviction and eviction enforcement orders that followed. As to the July 29, 2024 contempt order, Ivanova argues that (1) the order was void because it failed to identify what orders she violated to warrant a contempt finding; (2) she was not afforded a hearing and appropriate notice with regard to the contempt charge; (3) the order was void *ab initio* because it conflicted with an active criminal plenary order of protection; (4) the order “exceeded contempt authority” and inappropriately punished Ivanova by excluding her from the sale of the marital home; and (5) barring one of the owners of the home from the sales transaction while leaving it in the hands of a listing agent who was found guilty of an ethical violation regarding the same transaction was an abuse of discretion. Ivanova also asserts in her presentation of the issues on appeal that she was not afforded notice or a hearing regarding the contempt charge, and that the contempt order did not set a valid purge condition, but she does not argue these points.

¶ 22 As to the February 3, 2025 eviction order and the subsequent July 3, 2025 enforcement order, Ivanova argues that (1) the order was void *ab initio* because a criminal order of protection valid through June 30, 2025 gave her exclusive possessory right to the marital home; (2) the circuit court lacked jurisdiction to enter the eviction order because of the same order of protection; (3) motions for eviction cannot be brought by one spouse against the other; and (4) the court erred by finding that Ivanova violated its gainful employment order.

¶ 23 Ivanova asserts, regarding the July 25, 2025 enforcement order, that it (1) vacated an emergency order of protection without notice, hearing, or consideration of Ivanova’s safety; (2) “authorized custody/jail without a valid underlying order;” (3) made factual findings without a hearing or proof. She further argued that the court erred because (1) it “did not

make any audio recording or transcript of the proceeding;” (2) made an unsupported factual finding that she had lied about her place of residence; and (3) made “punitive threats without lawful authority.”

¶ 24

A. Jurisdiction

¶ 25

Although no party has raised the matter, we have an independent duty to verify whether we possess jurisdiction to hear the issues presented in this appeal. *Navigators Specialty Insurance Company v. Onni Contracting (Chicago), Inc.*, 2022 IL App (1st) 210827, ¶ 7. In her brief, Ivanova asserts that we possess jurisdiction under Rule 307 because the judgments being appealed “operate as injunctions affecting possession, removal from the residence, enforcement of eviction, and modification of protective rights.” Given that the orders in question are not among the types of orders enumerated under the subsections, we presume that Ivanova is referencing Rule 307(a)(1) specifically, which allows the appeals from orders “granting, modifying, refusing, dissolving, or refusing to dissolve or modify an injunction.” Ill. S. Ct. R. 307(a)(1) (eff. Nov 1, 2017).

¶ 26

“ ‘To determine what constitutes an appealable injunctive order under Rule 307(a)(1), we look to the substance of the action, not its form.’ ” *In re M.S.*, 2015 IL App (4th) 140857, ¶ 28) (citing *In re A Minor*, 127 Ill. 2d 247, 260 (1989)). An injunction is “a judicial process by which a party is required to do a particular thing, or to refrain from doing a particular thing, according to the exigency of the writ, the most common sort of which operate as a restraint upon the party in the exercise of his real or supposed rights.” (Internal quotation marks omitted.) *Id.*

¶ 27

The July 29, 2024 order found Ivanova to be in indirect civil contempt, though the type of contempt was not explicitly specified. Just as in *Bloomington Urological Associates*, this

order qualifies as an injunction because it required her to refrain from specific actions—in this case, involvement in the sale of the marital home. *Bloomington Urological Associates, SC v. Scaglia*, 292 Ill. App. 3d 793, 798-99 (1997) (Indirect civil contempt order prohibiting physician from providing urological services after court found him in violation of an agreed order to not compete with plaintiff urologist qualified for Rule 307 appeal.). Accordingly, the nature of the contempt order could grant this court jurisdiction under Rule 307.

¶ 28 However, Rule 307(a) requires that appeals of interlocutory orders be “perfected within 30 days from the entry of the interlocutory order.” Ill. S. Ct. R. 307(a) (eff. Nov. 1, 2017). This appeal was filed August 25, 2025, more than a year after the contempt order was entered. The rule allows for exceptions to this 30-day appeal period in those instances in which the injunction being appealed was entered *ex parte*, or in which the order being appealed is a temporary restraining order, but neither of those exceptions apply here. Ill. S. Ct. R. 307(b), (d) (eff. Nov. 1, 2017). We could attempt to reinterpret this appeal as an appeal under Rule 304(b), but even if we were to find it a viable order for appeal under that rule, it, too requires appeal within 30 days of the order’s entry. Accordingly, we do not have jurisdiction to review the order of July 29, 2024.

¶ 29 Ivanova’s appeal of the February 3, 2025 eviction order and the July 3, 2025 enforcement order are similarly untimely, regardless of the rule under which we consider them to be appealed. Ivanova filed a motion to reconsider on July 28, 2025, but such a motion does not toll the period of time during which an appeal can be taken. *Dus v. Provena St. Mary’s Hospital*, 2012 IL App (3d) 091064, ¶ 11 (citing Illinois Supreme Court Rule 303 (eff. July 1, 2017)); see also *Tyler v. Highline Auto Sales, Inc.*, 2023 IL App (1st) 221590, ¶ 25 (holding that this principle also applies to Rule 307 appeals); Ill. S. Ct. R. 304 (eff. Mar. 8,

2016) (adopting the 30-day period for appeal, which is not tolled by a motion to reconsider, from Rule 303). Accordingly, we need not examine whether they qualify as injunctions or under specifically enumerated carve-outs for interlocutory appeals.

¶ 30 The final orders appealed by Ivanova were entered July 25, 2025, 31 days before this appeal was filed. In this case, the appeal is timely because the 30th day landed on a Sunday, making the appeal’s filing date the final valid day on which to appeal. In those orders, the court vacated its July 21, 2025 emergency order of protection, finding that Ivanova obtained that order of protection by lying “on multiple occasions” and “fail[ing] to inform [the judge] that she was previously evicted by multiple court orders and that a pending eviction Order for her removal had been placed with the Cook County Sheriff,” as well as about her residence in Alton, Illinois. This matter is appealable, as it vacated an order of protection, which is injunctive in nature, because it, at the very least, forbids contact between individuals. *Fricke v. Jones*, 2021 IL App (5th) 200044, ¶ 18-19.

¶ 31 The court reiterated that the February 3, 2025 eviction order would remain in place and stated that Ivanova “is again ordered to vacate the subject premises.” The February 3 eviction had already ordered Ivanova to vacate the premises, meaning that this subsequent reiteration of that order had no injunctive effect of its own. Further, the final order deciding the issue was the order being reiterated, not this July 25 order. As such, this portion of the July 25 orders is not appealable under any rule.

¶ 32 Lastly, one of the July 25 orders authorized Maslii to occupy the home on Astor Lane and dictated that if Ivanova were to be found at the premises on or after July 28, 2025, she would be placed into custody by the Cook County Sheriff. The portion authorizing Maslii’s occupation of the home was only permissive, not prescriptive, so it cannot be called an

injunction on that basis. The other portion was another reiteration of the previous eviction order, albeit with the threat of incarceration, should Ivanova choose to defy the order. Ivanova was never actually penalized with incarceration, so this portion of the order is not final and appealable, as it is not injunctive, and so does not qualify under Rule 307. Additionally, it did not actually impose a penalty, and so does not qualify under the Rule 304(b)(5) carve-out for “[a]n order finding a person or entity in contempt of court which imposes a monetary or other penalty.” Ill. S. Ct. R. 304(b)(5) (eff. March 8, 2016).

¶ 33 B. Vacatur of Emergency Order of Protection

¶ 34 Ivanova argues that the court erred by vacating the July 21, 2025 emergency order of protection “without notice, a hearing, and consideration of the victim’s safety.” Ivanova states that the court made unsupported findings that she lied about living in student housing in Alton, Illinois while enrolled full-time in dental school at Southern Illinois University.

¶ 35 Ivanova’s brief lists authorities related to each point, but does not reference those authorities within her argument. Of the seven authorities cited by Ivanova in reference to the July 25, 2025 order, two do not exist at all, three do not stand for the proposition for which they were cited, and two are somewhat accurate.

¶ 36 Furthermore, the record adequately rebuts Ivanova’s claims without need for any reference to the law. The July 21, 2025 petition for an emergency order of protection alleged that Ivanova was “at home” when Maslii arrived and entered the home without notification and that she called the Rolling Meadows Police Department (RMPD) to the scene. Although the order of protection did not specify where this event took place, we believe it more likely that the RMPD was called to the marital home in Rolling Meadows, not to an apartment hundreds of miles away in Alton. Ivanova argues that she was not afforded notice or a

hearing prior to the order of protection being vacated, yet the record shows a response was filed, so she must have been on notice as to the allegations against her. Further, since Ivanova alleges that the court erred by failing to preserve a recording of the hearing that took place, we cannot credit her assertion that she was denied a hearing. Even if we were to accept that Ivanova was endangered by Maslii's presence, that danger only resulted because she was present in the home from which she had been evicted, and of which Maslii had been given sole ownership for the purposes of sale. Additionally, even though Ivanova had been awarded exclusive possession by the criminal order of protection issued in the earlier criminal case, that order of protection expired June 30, 2025.

¶ 37 Ivanova alleges that the circuit court erred by failing to maintain an audio recording or other record of the July 25, 2025 proceedings. She cites no authority for this assertion. It is well-settled that it is the appellant's burden to provide a sufficiently complete record of the circuit court proceedings. *Foutch v. O'Bryant*, 99 Ill. 2d 389, 391 (1984). "[I]n the absence of such a record on appeal, it will be presumed that the order entered by the trial court was in conformity with the law and had a sufficient factual basis. Any doubts which may arise from the incompleteness of the record will be resolved against the appellant." *Id.* at 392. For the foregoing reasons, we affirm the circuit court's vacatur of the July 21, 2025 order of protection.

¶ 38 C. Citations to Authority

¶ 39 As a final matter, we must discuss Ivanova's citations to authority. On its surface, Ivanova's *pro se* appellate brief looks relatively complete, for something written without legal training. However, that appearance is superficial; of the 23 citations Ivanova provided, fourteen do not at all stand for the proposition for which they were offered, four do not exist,

and five are accurate enough that it is conceivable that an untrained layman might choose to rely upon them. Within the category of citations that do exist, but do not stand for the asserted proposition, are many where the proposition for which the case was cited is so far afield from the content of the cited opinion that it cannot be interpreted as a mere misreading or misconception of law. For instance, Ivanova cites to *Rodriguez* to support her assertion that punishment for contempt requires identification of the order being violated, but *Rodriguez* concerns a petition for a certificate of innocence filed by a man who served 13 years in prison on a first-degree murder conviction that was ultimately vacated—it contains no mention of contempt, or even to any confusion as to what justified any sort of punishment. *People v. Rodriguez*, 2021 IL App (1st) 200173. We see no language in the opinion that could possibly be understood, even with the most skewed or creative interpretation imaginable, to stand for the proposition for which Ivanova cited the case. Other citations simply do not exist. Ivanova asserts that *People v. Jones*, 2021 IL App (1st) 200345 holds that an order conflicting with a protective order is void *ab initio*. This citation and the argument it supports are absolutely vital to Ivanova’s brief, yet the case does not exist at all.

¶ 40 Given the recent explosion in easy and inexpensive access to generative artificial intelligence tools (gen AI), it is difficult to interpret these egregiously and consistently flawed citations as anything but the work of gen AI. The use of gen AI is a relatively new concern with which our court has only begun to grapple. The only published opinions on this subject in Illinois resulted in monetary sanctions. *Scott v. Illinois Human Rights Commission*, 2026 IL App (1st) 251462, ¶ 82 (\$15,000 of sanctions and a referral to the Attorney Registration & Disciplinary Commission); *In re Baby Boy*, 2025 IL App (4th) 241427, ¶ 2, 130 (attorney sanctioned for the entire amount he was paid for his work on the case, plus an

additional \$1,000). In *Baby Boy*, the attorney admitted to using gen AI because he was “extremely busy” and there was “temptation of AI out there at a time when he was busy and trying to meet deadlines.” *In re Baby Boy*, 2025 IL App (4th) 241427, ¶ 48. In *Scott*, this court found that not only did the attorney willfully engage in misconduct by using gen AI, but he repeated the inaccurate quotations of statutory language in his reply brief even after opposing counsel pointed them out in its brief. *Scott*, 2026 IL App (1st) 251462, ¶ 43. We chose to base our sanctions in *Scott* on a rate of \$1,500 for each instance in which the attorney failed to catch and correct AI “hallucinations,” resulting in misstatements of the law. *Id.* ¶ 57.

¶ 41 It is worth repeating:

“This court rejects any suggestion that AI hallucinations are just ‘technical deficiencies’ or a fact of modern practice we must accept. ‘No brief, pleading, motion, or any other paper filed in any court should contain *any* citations—whether provided by generative AI or any other source—that the attorney responsible for submitting the pleading has not personally read and verified. [citation]. The only acceptable standard is zero false citations.” (Emphasis in original.) *Id.* ¶ 48.

¶ 42 Although Ivanova has no legal training, “a *pro se* litigant is held to the same standards as a litigant represented by an attorney.” *Williams v. Department of Human Services Division of Rehabilitation Services*, 2019 IL App (1st) 181517, ¶ 30; see also *Holzrichter v. Yorath*, 2013 IL App (1st) 110287, ¶ 78 (“In Illinois, parties choosing to represent themselves without a lawyer must comply with the same rules and are held to the same standards as licensed attorneys.”). We are not inclined to impose sanctions in this instance only because the widespread use of gen AI is a new enough phenomenon that a *pro se* layman could be

unaware of how prone the technology is to producing results that do not meet the standard expected of even *pro se* litigants. However, gen AI is becoming ubiquitous. It appears in every Google search, it is now commonplace as a first line of customer service, and 49 percent of Americans report using it, half of whom use it daily.¹ As a result, its misuse is rapidly moving from understandable ignorance to egregious misconduct. We choose the word “egregious” intentionally, as “[s]anctions may be awarded against *pro se* litigants under sufficiently egregious circumstances.” *Parkway Bank and Trust Co. v. Korzen*, 2013 IL App (1st) 130380, ¶ 87.

¶ 43 Just as the *pro se* brief in *Korzen* represented an egregious disregard for the legal process and an impermissible waste of the courts’ resources in the pre-AI halcyon days of 2013, careless use of gen AI is a sloppy workaround that only serves to enmire the court in not only doing the research the litigant (or counsel) should have performed, but also the difficult task of attempting to distinguish AI hallucinations from incompetence. There is one clear difference between the two: incompetence generally leads only to losing one’s appeal, but the intentionality of using gen AI suggests a willfulness that opens a *pro se* litigant to sanctions. See Illinois Supreme Court Rule 375(a) (eff. Feb 1, 1994) (permitting sanctions for a willful failure to comply with appellate rules). Given that the proceedings below demonstrated Ivanova’s willingness to lie to the court, this subsequent disregard for court rules treads on very thin ice. Any future filings from Ivanova found to contain wholly inaccurate or invented citations will result in a rule to show cause and, should the cause be misuse of AI or indifference to this court’s rules, sanctions will result.

¶ 44

III. CONCLUSION

¹ Jeffrey Gottfried et al., *Americans and AI 2026: Chatbots, Smart Devices and Views on Impact*, Pew Research Center, June 17, 2026, <https://www.pewresearch.org/internet/2026/06/17/americans-and-ai-2026-chatbots-smart-devices-and-views-on-impact/>.

¶ 45 For the foregoing reasons, we lack jurisdiction to review the appealed orders, with the exception of the July 25, 2025 vacatur of Ivanova’s order of protection, which we affirm.

¶ 46 Affirmed in part, dismissed in part.