



SUPREME COURT OF ILLINOIS

CHAMBERS OF
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January 30, 2026

Dear Legislative Leaders:

I am pleased to submit the Supreme Court's Annual Report to the General Assembly on the work of the Illinois Judicial Conference for 2025. This report is required by Article VI, Section 17, of the Illinois Constitution of 1970. In keeping with this Constitutional mandate, Illinois Supreme Court Rule 41 establishes the Illinois Judicial Conference and charges it with reviewing the administrative work of the courts, recommending improvements, and engaging in strategic planning for the Judicial Branch.

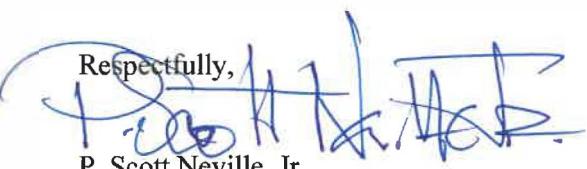
The Conference's work in 2025 was guided by the Supreme Court's [2022-2025 Strategic Agenda](#), which was developed by the Conference and approved by the Court. Titled *Charting the Course: Innovations and Transformations within the Illinois Judicial Branch*, the Strategic Agenda identified five core goals for the Judicial Branch:

1. Accessible Justice and Equal Protection Under the Law
2. Procedural Fairness, Timeliness, and Operational Efficiency
3. Professionalism and Accountability throughout the Branch
4. Understanding of, and Confidence in, the Judicial Branch
5. Sufficient Funding and Effective Use of Judicial Branch Resources

During 2025, the Conference advanced 10 initiatives, which are described in this report on pages 1-3. The Conference also completed its work on the 2022-2025 Strategic Agenda and developed the new 2026-2028 Judicial Branch Strategic Agenda. (Both agendas are available on the Supreme Court's website at www.illinoiscourts.gov.)

This report also includes a summary of selected Supreme Court decisions issued over the past year for the General Assembly's consideration. In presenting these cases, the Court is mindful of the distinct constitutional roles of the Judicial and Legislative Branches. We do not seek to intrude on the General Assembly's authority. Rather, we highlight these cases to assist in your deliberations and to support continued cooperation and share responsibility in serving the people of Illinois.

Respectfully,


P. Scott Neville, Jr.
Chief Justice
Illinois Supreme Court

Annual Report to the General Assembly on the 2025 Illinois Judicial Conference

Article VI, Section 17, of the Illinois Constitution of 1970 mandates that the Illinois Supreme Court convene an annual Judicial Conference to review the administrative work of the courts, recommend improvements, and engage in strategic planning for the Judicial Branch and submit this Annual Report to the General Assembly on the Conference's activities.

The [2022-2025 Strategic Agenda](#) outlines five primary goals for the Judicial Branch:

Goal 1: Accessible Justice and Equal Protection Under the Law

Goal 2: Fair, Timely, and Efficient Courts

Goal 3: Professionalism and Accountability throughout the Branch

Goal 4: Understanding of, and Confidence in, the Judicial Branch

Goal 5: Funding and Use of Judicial Resources

In 2025, the Conference advanced these objectives of the Strategic Agenda through 10 initiatives. Each initiative was assigned to an existing Supreme Court board, committee, commission, or task force. The Conference convened several times throughout the year to receive updates on the initiatives, and functioned as a clearinghouse for reports and proposed recommendations, policies, or rule changes.

The following summarizes the accomplishments of each initiative:

1. Access to Legal Services in Legal Deserts – Strategic Goal 1

Although Illinois has tens of thousands of lawyers, the majority are concentrated in Cook and the collar counties, leaving large parts of the state without adequate access to legal assistance. This initiative aims to recommend both near-term and longer-term solutions to ensure that residents of legal deserts have access to legal assistance when needed. The Conference adopted a comprehensive set of initial recommendations intended to incentivize lawyers to serve in legal deserts and expand access to legal help. The Supreme Court is currently considering these recommendations, and the Conference will continue to study this issue and make additional recommendations in 2026.

2. Strengthening Juvenile Detention Practices – Strategic Goal 1

Illinois maintains a complex system of oversight and accountability for juvenile detention. This initiative is developing recommendations to improve the administration and accountability of care provided by detention facilities statewide, in collaboration with the Department of Juvenile Justice and county governments. The Conference made substantial progress on this initiative in 2025, which continues in 2026.

3. Evaluation and Expansion of Court-Annexed Alternative Dispute Resolution – Strategic Goal 2

Alternative dispute resolution enables parties to resolve disputes efficiently and economically. This initiative develops recommendations to increase the effectiveness of court-annexed arbitration, mediation, and diversion programs. The Conference recommended and the Supreme Court approved changes to several Supreme Court rules intended to support the use of video conferencing technology in mandatory arbitration proceedings and to strengthen and standardize mediation practices statewide. The Conference will continue to study this topic and make further recommendations in 2026.

4. Best Practices for Emerging Adults in the Justice System – Strategic Goal 2

Emerging adults ages 18 to 24 are overrepresented in the criminal justice system. This initiative explores innovative and effective methods for improving how courts administer justice to young adults in order to achieve more effective outcomes. The Conference made substantial progress on this initiative in 2025, and its work continues in 2026.

5. Administrative Office of the Illinois Courts Data Governance Policy – Strategic Goal 3

The Supreme Court has prioritized improving the quality of information and data available from the Branch and courts across the state. This initiative developed a formal policy governing the collection, compilation, and maintenance of data by the Administrative Office of the Illinois Courts (AOIC). The Court approved the policy in late 2025.

6. Improve Policy/Practices Governing Judicial Branch Public Requests for Information – Strategic Goal 4

Although the Judicial Branch is not subject to the Freedom of Information Act, the Branch recognizes the need for clear and consistent policies and practices governing public requests for information from the courts. This initiative developed Branch-wide practices for responding to public requests for information and promoting transparency. The Court has approved recommendations identifying information that courts will proactively publish without the need for a request, and ensuring courts designate public information officers. The Court is currently developing a plan for implementation of these recommendations.

7. Employee Orientation / Educational Program – Strategic Goal 4

Judicial Branch and court employees play a vital role in fostering public confidence in and understanding of the Judicial Branch. Many of these employees lack prior Judicial Branch experience. This initiative created on-demand, interactive education for Judicial Branch employees on the basic tenets of the third and independent Judicial Branch of government, in general, and the Illinois court system specifically. These educational modules are intended to enhance understanding, build pride, and support informed interactions with the public, and will be rolled out in 2026.

8. Extended Media Coverage Policy – Strategic Goal 4

This initiative updated the judicial Branch’s “cameras in the courtroom” policies to reflect current conditions, address media coverage in the reviewing courts, and promote consistency statewide. A new Policy for Extended Media Coverage in the Circuit Courts of Illinois and a new Policy for Extended Media Coverage in the Appellate Courts of Illinois took effect on January 1, 2026.

9. DOC and DHS Collaboration to Improve Efficiency/Effectiveness of Court Proceedings – Strategic Goal 5

This initiative focused on partnering and collaborating with the Illinois Department of Corrections (DOC) and the Department of Human Services (DHS) to identify tools, practices, and programs to facilitate remote court appearances for participants who are in their custody and improve the efficiency and effectiveness of these proceedings. The Conference conducted surveys to help assess the current landscape and approved several new resources to help courts communicate with DOC and DHS, and facilitate arrangements for case participants to appear either in person or by video.

10. Supporting Effective Judicial Branch Engagement with Other Branches of Government – Strategic Goal 5

This initiative recommends ways the Illinois Judicial Branch can effectively and appropriately engage with the other branches of government to meet its goals while maintaining separation of powers. Work on this initiative is ongoing and is expected to conclude in 2026.

In addition to completing work on the 2022-2025 Strategic Agenda, the Conference proposed and the Court approved the 2026-2028 Strategic Agenda of the Judicial Branch.

Supreme Court Decisions the General Assembly May Wish to Consider

Martin v. Goodrich, 2025 IL 130509 (January 24, 2025)

Rodney Martin died of liver cancer that may have been caused by his occupational exposure to vinyl chloride monomer. The supreme court here confronted whether section 1(f) of the Workers' Occupational Diseases Act operated as a statute of repose blocking a survival action, whether the exception in recently enacted (2019) section 1.1 nonetheless allowed his family to bring a claim, and whether section 1.1's application complied with Illinois's constitutional standards for substantive due process.

The court held that section 1(f) did operate as a statute of repose, blocking Martin from bringing a claim under the Workers' Occupational Diseases Act, despite his symptoms from exposure first manifesting after the period expiring. The court also held that section 1.1 did apply prospectively as an exception to allow Martin's family to bring a civil action outside the exclusivity of the Workers' Occupational Diseases Act. Finally, the court held that Martin's family's action did not violate substantive due process because the defendants did not have a vested right to the exclusivity defense at the time his cause of action accrued.

This case may be significant to the legislature because it concerns the balance intended by it within the timing limitations of the Workers' Occupational Diseases Act.

People v. Morgan, 2025 IL 130626 (February 6, 2025)

This case concerns how Illinois's courts of appeal should review trial court decisions on pretrial detention and release under the amendments commonly known as the Pretrial Fairness Act.

Kendall Morgan was arrested, detained, and ultimately pled guilty to home invasion before this case was decided, but the supreme court still addressed the question under the public interest exception to mootness. The trial court had ordered Morgan detained after the State's proffer of the charges and his criminal history, finding the presumption great that Morgan committed the charged offenses and posed a threat to the community and victim. The appellate court affirmed, reasoning that the trial court had the opportunity to observe Morgan's demeanor and whether he appeared compliant, defiant, or threatening. As such, the appellate court found the trial court did not abuse its discretion. The supreme court affirmed but found the appropriate standard of review to be *de novo*—deciding the question anew—whenever the parties proceeded only by proffer and where no witness testimony was offered. Because the courts of appeal had the same record before them as the trial court, the trial court had no advantage of having observed any witnesses to determine their credibility, and so courts of appeal should decide whether the State satisfied its burden *de novo*. Where the parties presented live evidence, however, the courts of appeal should review such decisions under the manifest weight of the evidence standard.

This case may be significant to the legislature because it concerns how reviewing courts review detention decisions under the Pretrial Fairness Act.

Jordan v. Macedo, 2025 IL 130687 (March 20, 2025)

This case concerns whether a party who succeeded at arbitration can be awarded costs and prejudgment interest in the circuit court.

The arbitrator awarded Jordan \$13,070 for a traffic crash with Macedo, and neither party rejected the award. When Jordan sought prejudgment interest and statutory costs, the circuit court declined to award either, saying the arbitration award was the full amount. The appellate court reversed the denial of prejudgment interest but affirmed the denial of costs. The supreme court found that Jordan was entitled to both prejudgment interest and costs. Both the arbitration panel and the circuit court are proper forums to seek statutory costs, under both section 5-108 of the Code of Civil Procedure and Rule 92(e). 735 ILCS 5/5-108 (West 2022); Ill. S. Ct. R. 92(e) (eff. Jan. 1, 2017). Such costs are limited, ministerial, and automatic.

This case may be significant to the legislature because it affirms the ability to recover costs in the arbitration panel as well as the circuit court.

McCombie, et. al. v. The Illinois State Board of Elections, 2025 IL 131480 (April 9, 2025)

This case concerns whether candidates for office brought a timely challenge to legislative redistricting maps.

The supreme court held that plaintiffs were barred from bringing their original action, challenging the maps for failure to be “compact, contiguous and substantially equal in population” under the Illinois Constitution, because they waited too long and triggered the equitable doctrine of *laches*. The maps were signed into law in September 2021, and federal court action against the maps concluded months afterward. No appeal was taken, and then this action was brought in January 2025, some three years and four months (and two election cycles) after the maps had been enacted. The court found this delay exceeded other cases where it had denied leave to file such an action.

This case may be significant to the legislature because it concerns the election of members to the legislature.

Piasa Armory, LLC v. Raoul, 2025 IL 130539 (April 24, 2025)

This case concerns whether the legislature can direct constitutional challenges to Sangamon and Cook Counties for venue.

Piasa Armory challenged firearm-sale-related provisions of the Consumer Fraud and Deceptive Business Practices Act in Madison County and additionally contended that section 2-101.5 of the Code of Civil Procedure could not, constitutionally, direct such a challenge to Cook or Sangamon County. See 735 ILCS 5/2-101.5 (West 2024). The circuit court agreed that forcing venue to Sangamon County would deprive Piasa Armory of its best challenge to the firearms provisions. The supreme court reversed, finding that sending the case to Sangamon County did not deprive Piasa Armory of the opportunity to be heard at a meaningful time and in a meaningful manner. Sangamon County was only one hour further, the case would probably be resolved without trial, and remote appearances were possible.

This case may be significant to the legislature because it concerns the legislature’s determination of where venue is proper, particularly with regard to constitutional challenges to Illinois statutes.

[People v. Guy, 2025 IL 129967](#) (April 24, 2025)

This case concerns which specific intent the State must prove to convict for attempted first degree murder: (1) intent to kill or (2) intent to kill without lawful justification.

Travaris Guy was convicted of second degree murder and attempted first degree murder, with a jury instruction requiring the jury to find only that Guy had the intent to kill. But in convicting Guy of second degree murder, the jury found that Guy erroneously believed that his actions were lawfully justified self-defense. The supreme court noted that the jury's finding that Guy believed he had a need to defend himself was incompatible with an intent to kill without lawful justification. Rather than reversing Guy's conviction outright, the court entered a conviction on the lesser-included offense of aggravated battery with a firearm and remanded for sentencing.

This case may be significant to the legislature because it concerns what the State must prove for an attempted murder conviction.

[Hulsh v. Hulsh, 2025 IL 130931](#) (May 22, 2025)

This case concerns whether a parent can pursue a claim of interference with the parent-child relationship in Illinois courts.

Viera Hulsh regained custody of her children from their father through international kidnapping statutes; here, she sought to recover damages from her former mother-in-law and brother-in-law for allegedly helping him to illegally hide the children from her. Specifically, she alleged tortious interference with her custodial rights and aiding and abetting tortious interference with her custodial rights, and she sought to recover expenses that she incurred in the federal district court action to regain custody of her children. Viera contended her action should be recognized, where she sought purely economic damages from expenses incurred. The supreme court declined to judicially recognize the cause of action.

This case may be significant to the legislature because it concerns whether Illinois should recognize the tort of interference with the parent-child relationship, a question the supreme court expressly left to the legislature.

[People v. Thompson, 2025 IL 129965](#) (June 26, 2025)

This case concerns whether Illinois's "shall issue" regime for issuing licenses to carry a firearm concealed (CCL) violates recent United States Supreme Court holdings on the second amendment.

Tyshon Thompson challenged Illinois's statute on aggravated unlawful use of a weapon (720 ILCS 5/24-1.6(a)(1), (a)(3)(A-5) (West 2020)) as unconstitutional, contending that it categorically bans law-abiding citizens from openly carrying a handgun in public, contrary to the United States Supreme Court's recent holding in *New York State Rifle & Pistol Ass'n v. Bruen*, 597 U.S. 1 (2022). The supreme court held that, while the defendant is correct that his public carriage of a handgun is presumptively protected, *Bruen* itself stands for the proposition that Illinois's nondiscretionary, "shall-issue" firearm licensing regime does not facially violate the second amendment.

This case may be significant to the legislature because it concerns Illinois's regulation of firearms in public places.

[People v. Hoffman, 2025 IL 130344](#) (June 26, 2025)

This case concerns whether a criminal statute allowing a downward departure from mandatory minimum sentencing for offenses that “involve[] the use or possession of drugs” is intended to reach a conviction for drug-induced homicide.

Krystle Hoffman entered a guilty plea to drug-induced homicide for arranging a drug deal that led to Lorna Haseltine’s death. Hoffman contended that section 5-4-1(c-1.5) of the Unified Code of Corrections (730 ILCS 5/5-4-1(c-1.5) (West 2022)) allowed a downward departure to her sentence, as it involved the use or possession of drugs. The supreme court found the provision ambiguous but concluded the legislature did not intend to authorize a departure from mandatory minimum sentencing, after extensively reviewing the legislative history and finding that Hoffman’s reading of the statute could make the downward departure applicable to an extraordinarily broad number of offenses. Instead, the court concluded the statute was not intended to reach offenses that encompass delivery of drugs.

This case may be significant to the legislature because it concerns the intended reach of its provision, in section 5-4-1(c-1.5) of the Unified Code of Corrections, allowing a downward departure from mandatory minimum sentencing for offenses that “involve[] the use or possession of drugs”; the court specifically found a lack of clarity in this statute’s language.

[People v. Muhammad, 2025 IL 130470](#) (July 10, 2025)

This case concerns what qualifies as a tortured confession before the Torture Inquiry and Relief Commission (TIRC), so that a petitioner’s claim can be considered by the circuit court.

Abdul Muhammad was convicted of first degree murder, with one portion of the evidence against him being a detective’s statements that Muhammad denied knowledge of the murder, said he was aware there was a warrant out for his arrest, and said he moved to Washington to turn his life around. Muhammad’s claims to the TIRC alleged he was tortured in various ways by detectives at Area 2 and that he made no statement to them; the TIRC concluded Muhammad’s claims fell within its definition of a tortured confession and that there was sufficient evidence of State misconduct to warrant review in the circuit court. The circuit court, however, found Muhammad’s statement to a detective was not a “confession” under caselaw, so that the TIRC erred in referring the case for further proceedings in the circuit court. The TIRC’s regulations defined a tortured confession as “any incriminating statement, vocalization or gesture alleged by police or prosecutors to have been made” as a result of or shortly after interrogation that included torture. While the circuit court applied a narrower definition, the supreme court found the TIRC’s broader definition of a “confession” in its regulations was consistent with the remedial purpose of the TIRC Act. The court also found that Muhammad had not demonstrated a conflict of interest on the part of the special prosecutor reviewing his TIRC Act claim to have him removed from the case.

This case may be significant to the legislature because it concerns the intended reach of the TIRC Act and the intended standards for special prosecutors who review such claims under the TIRC Act.

Stewart v. Rosenblum, 2025 IL 131365 (September 18, 2025)

This case concerns the separation of powers and limitations on the circuit court's power to detain a defendant before trial.

Aimee Stewart failed to appear in court six times for a charge of possession of a stolen motor vehicle, after being ordered released several times. The trial court ordered Stewart detained until trial and held the pretrial release amendments commonly known as the Pretrial Fairness Act to be unconstitutional as applied to her, because it denied the trial court discretion to detain her after repeated failures to appear. She was detained over her counsel's objection that the hearing was not one to revoke pretrial release and that the State had only moved for sanctions; the respondent judge stated that mere sanctions would not allow it to move the case forward. The supreme court ordered Stewart's immediate release from custody. Her initial detention on the warrant for failure to appear was proper, but her continued detention after the preliminary hearing was not. The Pretrial Fairness Act does not violate the separation of powers as applied, and the respondent judge had no authority to indefinitely detain Stewart pending trial.

This case may be significant to the legislature because it concerns the relationship between the legislative and judicial branches and, specifically, limitations on the courts' ability to address a defendant's failure to appear.

Lavery v. Department of Financial and Professional Regulation, 2025 IL 130033 (September 18, 2025)

This case concerns the subject-matter jurisdiction of the circuit court to grant an award of attorney fees from successfully seeking a protective order under the Mental Health and Developmental Disabilities Confidentiality Act (Confidentiality Act).

Terrence Lavery successfully sought a protective order against being required to provide his treatment notes for a patient in an administrative proceeding over that patient's professional license. The circuit court also awarded Lavery attorney fees and costs pursuant to section 15 of the Confidentiality Act. The administrative agency appealed, contending the circuit court's award of attorney fees violated principles of sovereign immunity. The supreme court agreed the circuit court could not award attorney fees; the Illinois Constitution of 1970 made clear that the legislature has exclusive power to determine the circumstances in which sovereign immunity would be waived. Because the legislature had not expressly waived sovereign immunity in the Confidentiality Act, the circuit court was without subject-matter jurisdiction to issue a money judgment for attorney fees alongside Lavery's prospective relief.

This case may be significant to the legislature because it is a determination for the legislature whether sovereign immunity should be waived so that attorney fees and costs might be awarded under the Confidentiality Act.

[People v. Reed, 2025 IL 130595](#) (October 23, 2025)

This case concerns what a petitioner must demonstrate regarding his vacated conviction to be entitled to a certificate of innocence.

James Reed was charged with four counts of aggravated unlawful use of a weapon and ultimately pled guilty to one count, with the State dropping the other counts. The charge Reed pled guilty to happened to be a version of the offense later found unconstitutional in *People v. Aguilar*, 2013 IL 112116. Reed's conviction was vacated in 2022, and he sought a certificate of innocence. The circuit court denied his petition, finding that Reed failed to demonstrate he was innocent of all the offenses with which he was charged. The supreme court affirmed, concluding that, while a certificate of innocence establishes that a defendant is innocent of all charges for which he was incarcerated, the petitioner must prove his innocence of the charges in the charging instrument. Because Reed could not demonstrate his innocence of the charges dismissed pursuant to his negotiated plea agreement, he was not entitled to a certificate of innocence.

This case may be significant to the legislature to ensure the certificate of innocence statute reaches the defendants it is meant to reach and excludes the defendants it should not reach.