

APPELLATE COURT OF ILLINOIS, FIRST DISTRICT, FIFTH DIVISION

People v. Minnis

2026 IL App (1st) 232494 · No. 1-23-2494 · Decided May 8, 2026

SUMMARY

The Illinois Appellate Court, First District, affirmed Aleem Minnis's convictions for two counts of aggravated kidnapping and twelve counts of aggravated criminal sexual assault, along with his aggregate 96-year sentence. The court held that the trial court did not abuse its discretion in denying Minnis's requests to substitute counsel, rejected his challenges to the victims' identification procedures, and upheld the sentence.

CASE DETAILS

COURT	Appellate Court of Illinois, First District, Fifth Division
WRITING FOR THE COURT	Justice Oden Johnson; Presiding Justice Mitchell; Justice Wilson
JURISDICTION	Illinois Appellate Court, First District
DECIDED	May 8, 2026
DOCKET	1-23-2494
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed from a Cook County Circuit Court judgment entered after a jury convicted him of two counts of aggravated kidnapping and twelve counts of aggravated criminal sexual assault. He challenged the denial of his request to substitute counsel, the denial of his motion to suppress eyewitness identifications, and his 96-year consecutive sentence.
STANDARD OF REVIEW	The denial of a request for a continuance to substitute counsel is reviewed for abuse of discretion. Historical findings concerning a suppression motion are reviewed for manifest error, while the ultimate legal question concerning suppression is reviewed de novo. A sentence is reviewed for abuse of discretion and will not be disturbed absent a sentence greatly at variance with the spirit and purpose of the law or manifestly disproportionate to the offense.
PRECEDENTIAL VALUE	Published, precedential Illinois appellate decision
PARTIES	Aleem Minnis v. The People of the State of Illinois

TOPICS

right to counsel

suppression of evidence

criminal procedure

sentencing

appellate procedure

PRACTICE AREAS

criminal procedure

criminal appeals

constitutional criminal procedure

sentencing

evidence

QUESTIONS PRESENTED

1. Whether the trial court abused its discretion by denying Minnis's request shortly before trial to substitute counsel when the proposed substitute counsel was not ready, willing, and able to proceed to trial.
2. Whether the victims' pretrial photo-array identifications were impermissibly suggestive because the same array was used for both victims, the victims communicated between identifications, and the police allegedly failed to comply with statutory recording and admonishment requirements.
3. Whether Minnis's aggregate 96-year consecutive sentence was excessive because the court allegedly failed to give sufficient weight to his youth and rehabilitative potential or improperly considered his assertion of innocence and lack of remorse.

HOLDINGS

1. The trial court did not abuse its discretion in denying Minnis's request to substitute counsel or continue the trial because the request was made after extensive delay, the proposed substitute counsel was not ready, willing, and able to proceed, and the record supported the trial court's conclusion that the request would delay the proceedings.
2. The trial court properly denied suppression because Minnis failed to establish that either photo-array procedure was impermissibly suggestive; therefore, no independent-basis hearing was required.
3. The aggregate 96-year sentence was not excessive and did not constitute an abuse of discretion.

KEY QUOTATIONS

“First, the court must determine if the procedure was, in fact, suggestive.” (¶ 45)

“In this first step, it is the defendant who carries the burden of establishing that the pretrial identification procedure was impermissibly suggestive.” (¶ 45)

*“It is well settled that the trial court has broad discretionary powers in imposing a sentence ***.”* (¶ 74)

“[A] sentence within statutory limits will be deemed excessive and the result of an abuse of discretion by the trial court where the sentence is greatly at variance with the spirit and purpose of the law, or manifestly disproportionate to the nature of the offense.” (¶ 75)

FACTUAL BACKGROUND

In the early morning of June 26, 2016, Minnis approached two women in their car while holding a gun, forced his way into the vehicle, directed them to a vacant parking lot, and compelled each to engage in multiple sexual acts. The victims contacted police after Minnis left and later identified him from photo arrays administered on

separate days by different independent administrators. A condom-wrapper swab contained a DNA mixture that STRmix analysis found was approximately 110,000 times more likely to have originated from Minnis and two unknown individuals than from three unknown individuals. Minnis was 23 years old at the time of the offenses and had prior felony and weapons-related convictions.

PROCEDURAL HISTORY

Minnis was charged in Cook County Circuit Court case No. 16 CR 13463. After extensive pretrial litigation, the circuit court denied motions concerning the identification procedures and other evidence, denied Minnis's request shortly before trial to substitute counsel or proceed with different counsel, and proceeded with a jury trial. The jury convicted him, the court imposed an aggregate 96-year sentence, and the court denied his posttrial motion and motion to reconsider sentence. The Illinois Appellate Court affirmed.

DISPOSITION

affirmed

CASES CITED

- People v. Tucker, 382 Ill. App. 3d 916 (2008)
- People v. Adams, 2016 IL App (1st) 141135
- People v. Segoviano, 189 Ill. 2d 228 (2000)
- People v. Kilkelly, 2026 IL App (2d) 240776
- People v. Bingham, 364 Ill. App. 3d 642 (2006)
- People v. Terry, 177 Ill. App. 3d 185 (1988)
- People v. Burrell, 228 Ill. App. 3d 133 (1992)
- People v. Harrison, 2022 IL App (1st) 161172-U
- Frye v. United States, 293 F. 1013 (D.C. Cir. 1923)
- People v. Clifton, 2019 IL App (1st) 151967
- People v. Ortiz, 2017 IL App (1st) 142559
- People v. Luedemann, 222 Ill. 2d 530 (2006)
- People v. Sorenson, 196 Ill. 2d 425 (2001)
- In re N.A., 2018 IL App (1st) 181332
- People v. Hayes, 319 Ill. App. 3d 810 (2001)
- People v. Hillier, 237 Ill. 2d 539 (2010)
- People v. Roberts, 2020 IL App (1st) 172262
- People v. Morgan, 2025 IL 130626
- People v. Myrieckes, 315 Ill. App. 3d 478 (2000)
- People v. Stacey, 193 Ill. 2d 203 (2000)
- People v. Charleston, 2018 IL App (1st) 161323
- People v. Abrams, 2015 IL App (1st) 133746

- People v. Ward, 113 Ill. 2d 516 (1986)
- People v. Donlow, 2020 IL App (4th) 170374

Retrieved from lawtools.ai · <https://lawtools.ai/cases/state/illinois-appellate-court-first-district-appellate-court-of-illinois-first-district-fifth-division/2026/people-v-minnis-35rc4vl6>