

APPELLATE COURT OF ILLINOIS, FIRST DISTRICT, SIXTH DIVISION

People v. Gates

2026 IL App (1st) 211422-B · No. 1-21-1422 · Decided May 15, 2026

SUMMARY

The Illinois Appellate Court, First District, affirmed Quinton Gates’s convictions and 48-year sentence after reconsidering its prior decision in light of People v. Spencer. The court held that trial counsel erred by conceding that the statutory minimum sentence applied while offering no factual basis for an emerging-adult proportionate-penalties challenge. However, Gates could not establish prejudice on the existing record because the application of youth-related science to his circumstances must be developed in postconviction proceedings.

CASE DETAILS

COURT	Appellate Court of Illinois, First District, Sixth Division
WRITING FOR THE COURT	Justice Hyman; Justice Pucinski; Justice Gamrath
JURISDICTION	Illinois Appellate Court, First District
DECIDED	May 15, 2026
DOCKET	1-21-1422
DISPOSITION	affirmed
PROCEDURAL POSTURE	Gates appealed his convictions and sentence, previously obtaining a remand from the Illinois Appellate Court for resentencing based on ineffective assistance of counsel. The Illinois Supreme Court vacated that decision and directed reconsideration in light of People v. Spencer.
STANDARD OF REVIEW	Ineffective-assistance-of-counsel claims are reviewed de novo.
PRECEDENTIAL VALUE	Published and precedential Illinois Appellate Court opinion
PARTIES	Quinton Gates v. The People of the State of Illinois

TOPICS

- ineffective assistance
- sentencing
- post-conviction relief
- appellate procedure
- constitutional law

PRACTICE AREAS

- criminal law
- criminal procedure
- sentencing
- constitutional law
- post-conviction relief

QUESTIONS PRESENTED

1. Whether trial counsel provided ineffective assistance by conceding that the trial court lacked authority to impose a sentence below the statutory minimum.
2. Whether Gates was prejudiced by counsel's failure to present an as-applied proportionate-penalties challenge supported by evidence concerning emerging-adult development and the science underlying Miller.
3. Whether Gates's as-applied proportionate-penalties claim was waived or outside the scope of the Illinois Supreme Court's supervisory order.

HOLDINGS

1. Gates's claim that counsel was ineffective for failing to advocate for a sentence below the statutory minimum fell within the supervisory order and was neither waived nor a new claim.
2. Trial counsel performed deficiently by conceding that the trial court lacked authority to impose a sentence below the statutory minimum while asking for juvenile-style sentencing and failing to present a factual basis for applying Miller-related science to Gates.
3. Gates failed to establish prejudice because the appellate record lacked the scientific and factual evidence necessary to determine whether Miller-related science applied to him as an emerging adult or supported an as-applied proportionate-penalties challenge.
4. Miller v. Alabama applies only to juveniles; its underlying science may inform an emerging adult's as-applied proportionate-penalties challenge, but courts may not presume that the science applies to an emerging adult without a developed evidentiary record.

KEY QUOTATIONS

"First, Miller applies only to juveniles, not emerging adults." (§ 31)

"The law is well settled that sentencing courts have the power to impose a sentence below the statutory minimum but only when justified by the facts." (§ 54)

"As Spencer instructs, emerging adults must first litigate the application of that science before a factfinder, not on appeal." (§ 57)

"Here, counsel's errors did not produce a record that allows us to find prejudice." (§ 60)

FACTUAL BACKGROUND

Gates was convicted of shooting and killing a member of the Lowe Life gang after several witnesses identified him as the shooter. He was slightly over 18 at the time of the offense and had experienced significant family instability, including the death of his mother, his father's imprisonment, displacement, and the violent deaths of relatives and a close friend. At sentencing, counsel presented mitigation and sought treatment similar to that afforded juvenile offenders, but conceded that the court lacked authority to impose a sentence below the statutory minimum and did not present evidence applying Miller-related science specifically to Gates.

PROCEDURAL HISTORY

A jury convicted Gates of first degree murder and discharge of a firearm causing death. The circuit court imposed a 48-year sentence, consisting of 23 years for murder and a 25-year firearm enhancement. The appellate court previously held that counsel was ineffective and remanded for resentencing, but the Illinois Supreme Court vacated that decision and ordered reconsideration under Spencer. On reconsideration, the appellate court held counsel performed deficiently but that Gates could not establish prejudice on the existing record, and affirmed.

DISPOSITION

affirmed

CASES CITED

- People v. Spencer, 2025 IL 130015
- People v. Gates, 2023 IL App (1st) 211422
- Miller v. Alabama, Miller v. Alabama, 567 U.S. 460 (2012)
- Strickland v. Washington, 466 U.S. 668 (1984)
- People v. Grant, 2014 IL App (1st) 100174-B, ¶ 39
- People v. Domagala, 2013 IL 113688, ¶ 36
- People v. Berrier, 362 Ill. App. 3d 1153, 1167 (2005)
- People v. Hilliard, 2023 IL 128186, ¶ 29
- People v. Fuller, 187 Ill. 2d 1, 10-11 (1999)
- People v. Miller, 202 Ill. 2d 328, 342 (2002)
- People v. Moore, 2023 IL 126461, ¶ 42
- People v. Wright, 111 Ill. 2d 18, 30-31 (1986)
- People v. Wiley, 205 Ill. 2d 212, 237 (2001)
- People v. Brewer, 2025 IL App (1st) 240088, ¶ 42
- People v. Thompson, 2015 IL 118151, ¶ 38
- People v. Patterson, 2014 IL 115102, ¶ 81
- People v. Veach, 2017 IL 120649, ¶ 47