

APPELLATE COURT OF ILLINOIS, FIRST DISTRICT

People v. Hill

2025 IL App (1st) 230604 · No. 1-23-0604 · Decided December 31, 2025

SUMMARY

The Illinois Appellate Court, First District, reviewed William Hill’s convictions for first degree murder following a jury trial. The court held that trial counsel provided ineffective assistance by failing to communicate sufficiently with Hill and failing to investigate a potential witness identified by him. The court reversed the judgment and remanded for a new trial, while also addressing evidentiary, prosecutorial-misconduct, and jury-polling claims.

CASE DETAILS

COURT	Appellate Court of Illinois, First District
WRITING FOR THE COURT	Presiding Justice C.A. Walker; Justice Hyman; Justice Gamrath
JURISDICTION	Appellate Court of Illinois, First District
DECIDED	December 31, 2025
DOCKET	1-23-0604
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Direct appeal from a judgment of conviction for first degree murder and a 35-year sentence following a jury trial. Defendant argued ineffective assistance of counsel, evidentiary error, prosecutorial misconduct, and jury-polling error.
STANDARD OF REVIEW	Ineffective-assistance claims present mixed questions of law and fact but are ultimately reviewed de novo. The court applied the two-pronged Strickland standard and reviewed the posttrial record concerning counsel's conduct and prejudice.
PRECEDENTIAL VALUE	Published and precedential Illinois Appellate Court opinion
PARTIES	William Hill v. The People of the State of Illinois

TOPICS

- ineffective assistance
- right to counsel
- criminal procedure
- appellate procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether trial counsel rendered ineffective assistance by failing to communicate sufficiently with Hill, including failing to adequately prepare him to decide the scope of his trial testimony.
2. Whether trial counsel rendered ineffective assistance by failing to investigate Rodriguez as a potential defense witness.
3. Whether the cumulative effect of counsel's deficient communication, inadequate witness investigation, and related defense decisions created a reasonable probability of a different result and required a new trial.
4. Whether the court should reach Hill's claims concerning admission of the Citgo incident, prosecutorial misconduct, and jury polling after reversing on ineffective assistance.

HOLDINGS

1. Trial counsel provided objectively unreasonable assistance by failing to communicate sufficiently with Hill in a first degree murder case, including failing to provide adequate confidential preparation and meaningful review of discovery and video evidence.
2. Counsel's failure to investigate Rodriguez after Hill identified him as a potential witness was objectively unreasonable; the possibility that Rodriguez might have been unwilling to testify or might have incriminated himself did not excuse counsel from contacting and assessing the witness.
3. The cumulative effect of counsel's deficient communication and failure to investigate Rodriguez created a reasonable probability of a different result and undermined confidence in the trial's reliability.
4. The court did not reach the merits of Hill's claims concerning admission of the Citgo incident, prosecutorial misconduct, or jury polling because ineffective assistance independently required reversal and a new trial.

KEY QUOTATIONS

"We find the law requires criminal defense counsel to provide representation far more thorough than what was rendered here, particularly in a case involving a first degree murder charge." (¶ 59)

"Hill's trial counsel acted objectively unreasonably by failing to communicate with Hill and not sufficiently investigating whether Rodriguez would testify, and the cumulative effect of these errors rendered the trial result unreliable." (¶ 76)

FACTUAL BACKGROUND

Hill was charged with the 2016 shooting death of Jeremy Rogers at a Chicago gas station and with attempted murders arising from the same incident. The State introduced evidence that Hill confronted Rogers, made a phone call, and that a masked shooter arrived shortly afterward, shot Rogers, and fled with Hill; it also introduced other-crimes evidence concerning a prior shooting at a Citgo station. Hill's trial counsel had little documented communication with him, did not meaningfully review discovery or video evidence with him, failed

to investigate Rodriguez after Hill identified him as a potential witness concerning the Citgo incident, and presented only limited testimony from Hill. Hill was convicted of first degree murder and sentenced to 35 years.

PROCEDURAL HISTORY

Hill was found not guilty of two counts of attempted first degree murder but guilty of first degree murder after a jury trial in the Circuit Court of Cook County. The circuit court denied his amended omnibus posttrial motion alleging, among other things, ineffective assistance based on inadequate communication and failure to investigate a potential witness, and sentenced him to 35 years' imprisonment. The Illinois Appellate Court reversed and remanded for a new trial based on ineffective assistance of counsel and did not reach the evidentiary, prosecutorial-misconduct, or jury-polling claims.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Reverse Hill's conviction and remand to the Circuit Court of Cook County for a new trial.

CASES CITED

- Strickland v. Washington, 466 U.S. 668 (1984)
- People v. Logan, 2024 IL 129054
- People v. Johnson, 2021 IL 126291
- People v. Bass, 2022 IL App (1st) 210249
- People v. Knapp, 2020 IL 124992
- People v. Coleman, 2011 IL App (1st) 091005
- People v. Coleman, 183 Ill. 2d 366 (1998)
- People v. Makiel, 358 Ill. App. 3d 102 (2005)
- People v. Moore, 356 Ill. App. 3d 117 (2005)
- People v. Vera, 277 Ill. App. 3d 130 (1995)
- People v. Tillman, 226 Ill. App. 3d 1 (1991)
- People v. Bell, 152 Ill. App. 3d 1007 (1987)
- People v. Jackson, 2016 IL App (1st) 133741
- People v. Gray, 406 Ill. App. 3d 466 (2010)
- People v. West, 187 Ill. 2d 418 (1999)
- People v. Staaake, 2017 IL 121755
- People v. Molstad, 101 Ill. 2d 128 (1984)
- People v. Hayes, 2011 IL App (1st) 100127
- People v. Agee, 2023 IL 128413

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