

APPELLATE COURT OF ILLINOIS, FIRST DISTRICT, THIRD DIVISION

People v. Williams

2025 IL App (1st) 240582 · No. 1-24-0582 · Decided December 3, 2025

SUMMARY

Larone Williams appealed his aggravated battery conviction arising from an altercation on a Chicago Transit Authority train. He argued that the State failed to disprove his self-defense and defense-of-others claims beyond a reasonable doubt, that the jury was improperly instructed, and that the trial court improperly polled only 11 of 12 jurors. The Illinois Appellate Court affirmed the conviction.

CASE DETAILS

COURT	Appellate Court of Illinois, First District, Third Division
WRITING FOR THE COURT	Justice Reyes; Justice Lampkin; Justice Rochford
JURISDICTION	Illinois Appellate Court, First District, Third Division
DECIDED	December 3, 2025
DOCKET	1-24-0582
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from conviction of aggravated battery after jury trial
STANDARD OF REVIEW	Sufficiency of evidence reviewed under Jackson v. Virginia standard (viewing evidence in light most favorable to State, whether any rational trier of fact could find essential elements beyond reasonable doubt). Jury instruction decision reviewed for abuse of discretion; accuracy of instructions reviewed de novo. Plain error review applied to unpreserved claims.
PRECEDENTIAL VALUE	Published
PARTIES	Larone Williams v. People of the State of Illinois

TOPICS

- self defense
- criminal procedure
- jury instructions
- appellate procedure

PRACTICE AREAS

- criminal law
- criminal procedure

QUESTIONS PRESENTED

1. Whether the State disproved defendant's affirmative defenses of self-defense and defense of others beyond a reasonable doubt
2. Whether the trial court improperly instructed the jury with a provocation instruction
3. Whether the trial court's response to the jury's question about instructions was misleading
4. Whether polling only 11 of 12 jurors constituted plain error requiring a new trial

HOLDINGS

1. A rational jury could have found the State disproved defendant's self-defense and defense of others claims beyond a reasonable doubt.
2. The trial court did not abuse its discretion in giving the provocation instruction because there was some evidence defendant was the initial aggressor.
3. The provocation instruction accurately stated the law and applied to both self-defense and defense of others claims.
4. The trial court's response adequately clarified that both defense instructions applied to both defendants.
5. The error in polling only 11 jurors did not rise to the level of plain error under the first prong of the plain-error analysis.

KEY QUOTATIONS

“A claim of self-defense is not available to a person who ‘initially provokes the use of force against himself’ unless such force is so great that he reasonably believes that he is in imminent danger of death or great bodily harm and he has exhausted every reasonable means to escape such danger other than the use of force that is likely to cause death or great bodily harm to the assailant.” (¶ 49)

“Defendant chose to involve himself in the ongoing altercation on the train, despite having no connection with it other than being a fellow train passenger. Defendant sought out Beam and then, upon finding him, worked with Holman and Thomas to pursue him until Beam was effectively trapped on the train car, with defendant in the doorway and Holman and Thomas blocking the aisle.” (¶ 50)

“Defendant chose to involve himself in a situation in which he did not have all the facts, proceeding under the assumption that Beam was a wrongdoer based on secondhand information.” (¶ 53)

“By its own terms, section 7-4(c) would apply to bar the application of section 7-1(a), regardless of whether the claimed justification was defense of self or defense of others.” (¶ 63)

“A criminal defendant's right to request a polling of the jury is a safeguard that is designed to help ensure that the defendant is afforded an important constitutional right, i.e., juror unanimity.” (¶ 72)

FACTUAL BACKGROUND

Defendant was a passenger on a CTA Red Line train. After an attempted robbery, the victim (Beam) stabbed one of the attackers. Defendant, learning of the stabbing from the group, pursued Beam with a bottle. After a chase,

Beam lunged at defendant with a knife, and defendant struck Beam with the bottle, resulting in aggravated battery charges. Defendant claimed self-defense and defense of others.

PROCEDURAL HISTORY

Defendant Larone Williams was convicted of aggravated battery after a jury trial and sentenced to two years and six months in IDOC. He appealed, claiming insufficient evidence to disprove self-defense/defense of others, improper jury instructions, and improper jury polling.

DISPOSITION

affirmed

CASES CITED

- Jackson v. Virginia, 443 U.S. 307 (1979)
- People v. Smith, 185 Ill. 2d 532 (1999)
- People v. Coleman, 2023 IL App (2d) 220008
- People v. Rowell, 229 Ill. 2d 82 (2008)
- People v. Jackson, 232 Ill. 2d 246 (2009)
- People v. Ross, 229 Ill. 2d 255 (2008)
- People v. Herman, 407 Ill. App. 3d 688 (2011)
- People v. Cunningham, 212 Ill. 2d 274 (2004)
- People v. Jeffries, 164 Ill. 2d 104 (1995)
- People v. Lee, 213 Ill. 2d 218 (2004)
- People v. Taylor, 2016 IL App (1st) 141251
- People v. Wiley, 2025 IL App (5th) 230036-U
- People v. Hartfield, 2022 IL 126729
- People v. Mohr, 228 Ill. 2d 53 (2008)
- People v. Sloan, 2024 IL 129676
- People v. Parker, 223 Ill. 2d 494 (2006)
- People v. Woods, 2023 IL 127794
- People v. Brown, 406 Ill. App. 3d 1068 (2011)
- People v. Floyd, 262 Ill. App. 3d 49 (1994)
- People v. Reid, 136 Ill. 2d 27 (1990)
- People v. Childs, 159 Ill. 2d 217 (1994)
- People v. Sebbby, 2017 IL 119445
- People v. Piatkowski, 225 Ill. 2d 551 (2007)
- People v. Jackson, 2022 IL 127256
- People v. Flores, 2021 IL App (1st) 192219

- People v. Sharp, 2015 IL App (1st) 130438

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