

APPELLATE COURT OF ILLINOIS, FIRST DISTRICT, SECOND DIVISION

In re A.E. and C.D., Minors

2026 IL App (1st) 250918 · No. 1-25-0918 · Decided June 16, 2026

SUMMARY

The Illinois Appellate Court reviewed a juvenile court’s findings that A.E. and C.D. were abused or neglected and its decision to make them wards of the court. The court considered whether the findings were against the manifest weight of the evidence and whether the juvenile court properly quashed the respondent’s efforts to compel the minors to testify or submit to depositions. The opinion discusses the minors’ out-of-court statements, evidence of physical abuse and an injurious environment, and the minors’ best interests.

CASE DETAILS

COURT	Appellate Court of Illinois, First District, Second Division
WRITING FOR THE COURT	Justice McBride; Justice Ellis; Justice D.B. Walker
JURISDICTION	Illinois Appellate Court, First District, Second Division
DECIDED	June 16, 2026
DOCKET	1-25-0918
DISPOSITION	affirmed
PROCEDURAL POSTURE	Respondent appealed from orders of the Circuit Court of Cook County adjudicating A.E. and C.D. abused or neglected, making them wards of the court, and denying respondent's requests to compel the minors to testify or sit for depositions.
STANDARD OF REVIEW	Findings of abuse and neglect are reviewed under the manifest-weight-of-the-evidence standard. The denial of a request to compel a minor's appearance is reviewed for abuse of discretion.
PRECEDENTIAL VALUE	Published and precedential opinion
PARTIES	S.E. v. The People of the State of Illinois, A.E. and C.D., Minors

TOPICS

- family law procedure
- evidence
- appellate procedure
- standard of review

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the juvenile court's findings that A.E. and C.D. were abused based on a substantial risk of physical injury and neglected based on an injurious environment were against the manifest weight of the evidence.
2. Whether the juvenile court abused its discretion by denying respondent's request to compel the minors to testify at the adjudicatory hearing and to sit for depositions.

HOLDINGS

1. The findings that A.E. and C.D. were abused and neglected were not against the manifest weight of the evidence. Physical injury was not required to establish abuse based on a substantial risk of physical injury, and the minors' statements were sufficiently corroborated by each other, the observed bruising, the circumstances of the incident, and respondent's history.
2. The juvenile court did not abuse its discretion in denying respondent's requests to compel the minors' testimony or depositions because compelling their participation was not in their best interests in light of their extensive trauma, mental-health concerns, and stated unwillingness to testify.

KEY QUOTATIONS

“Thus, the juvenile court was not required to find physical evidence of injury as a result of respondent’s choking of A.E.” (¶ 43)

“The record fully supports the trial court’s finding that it was not in the best interest of the minors to be compelled to testify or provide depositions.” (¶ 52)

FACTUAL BACKGROUND

Respondent was the mother of A.E. and C.D., who had previously been removed from her care and adjudicated abused and neglected. In June 2024, after the minors stayed with respondent for approximately a week, respondent argued with A.E. over a phone, allegedly choked her, and made both minors leave the home; the minors then contacted police and went to a hospital, where bruising was observed on A.E.'s upper lip. The minors had extensive trauma and mental-health histories, including suicidal ideation, and respondent had a lengthy history of DCFS investigations and prior abuse or neglect findings involving her children.

PROCEDURAL HISTORY

The State filed petitions for adjudication of wardship in July 2024. The juvenile court found probable cause, ordered the minors removed from respondent's home, later denied respondent's requests to compel or depose the minors, and adjudicated them abused and neglected. After a dispositional hearing, the court made the minors wards of the court and set a goal of return home within 12 months. The appellate court affirmed.

DISPOSITION

affirmed

CASES CITED

- In re A.P., 2012 IL 113875, ¶¶ 18-22
- In re Arthur H., 212 Ill. 2d 441, 463-64 (2004)
- In re M.D., 2021 IL App (1st) 210595, ¶¶ 24-25
- In re A.S., 2020 IL App (1st) 200560, ¶ 35
- In re J.R., 2022 IL App (1st) 221109, ¶¶ 36, 53
- Wasleff v. Dever, 194 Ill. App. 3d 147, 155-56 (1990)
- In re Jordyn L., 2016 IL App (1st) 150956, ¶ 39
- In re Jeh. R., 2023 IL App (1st) 230006, ¶¶ 64, 68
- In re Z.C., 2022 IL App (1st) 211399, ¶¶ 43, 48, 51
- In re J.L., 2016 IL App (1st) 152479, ¶¶ 92, 108
- In re Alexis H., 401 Ill. App. 3d 543, 561 (2010)
- In re K.O., 336 Ill. App. 3d 98, 109 (2002)
- In re J.C., 2019 IL App (1st) 182226, ¶¶ 38, 45
- In re Mark W., 383 Ill. App. 3d 572, 589-90 (2008)
- In re A.W., 397 Ill. App. 3d 868, 874 (2010)