

SUPREME COURT OF ILLINOIS

People v. Johnson

2026 IL 131337 · No. 131337 · Decided March 19, 2026

SUMMARY

The Illinois Supreme Court reviews whether the evidence was sufficient to prove Antrell Johnson guilty beyond a reasonable doubt of first degree murder based primarily on eyewitness identifications. The court holds that the appellate court improperly conflated the Biggers standard governing admissibility of identification evidence with the Jackson standard governing sufficiency of the evidence, and it reverses and remands for further proceedings on an ineffective-assistance claim.

CASE DETAILS

COURT	Supreme Court of Illinois
WRITING FOR THE COURT	Justice Rochford; Chief Justice Neville; Justice Overstreet; Justice Holder White; Justice Cunningham; Justice O'Brien
JURISDICTION	Supreme Court of Illinois
DECIDED	March 19, 2026
DOCKET	131337
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	The State petitioned for leave to appeal from a divided Illinois Appellate Court, First District, decision reversing Johnson's first-degree-murder conviction for insufficient evidence. The Illinois Supreme Court allowed the petition and reviewed whether the evidence was sufficient to prove Johnson was the shooter.
STANDARD OF REVIEW	For a sufficiency-of-the-evidence challenge, the reviewing court asks whether, viewing the evidence in the light most favorable to the prosecution, any rational trier of fact could have found the essential elements beyond a reasonable doubt. The reviewing court does not retry the defendant or substitute its judgment for the fact finder's credibility and weight determinations. Eyewitness evidence is insufficient only when the record compels the conclusion that no reasonable person could accept it beyond a reasonable doubt.
PRECEDENTIAL VALUE	Published, precedential opinion of the Supreme Court of Illinois
PARTIES	The People of the State of Illinois v. Antrell Johnson

TOPICS

criminal procedure

evidence

reasonable doubt

standard of review

appellate procedure

PRACTICE AREAS

criminal law

criminal procedure

appellate practice

evidence

QUESTIONS PRESENTED

1. Whether the appellate court applied the correct legal standard when reviewing the sufficiency of eyewitness-identification evidence.
2. Whether the evidence, viewed in the light most favorable to the prosecution, was sufficient for a rational trier of fact to find Johnson guilty beyond a reasonable doubt of Tyler's first-degree murder.
3. Whether the appellate court improperly relied on extra-record social-science research to assess the sufficiency and reliability of the eyewitness identifications.
4. Whether the appellate court improperly relied on the jury's acquittal on the attempted-murder count to discredit the evidence supporting the murder conviction.
5. Whether the case should be remanded for consideration of Johnson's ineffective-assistance-of-counsel claim.

HOLDINGS

1. The Biggers framework for determining whether an eyewitness identification should be suppressed because of suggestive police procedures is not the standard for reviewing the sufficiency of trial evidence. Sufficiency review is governed by *Jackson v. Virginia* and requires deference to the fact finder's credibility determinations.
2. Although the Biggers admissibility test does not govern sufficiency review, the five Biggers reliability factors may be considered, along with the totality of the circumstances, when weighing identification evidence in a sufficiency challenge.
3. The eyewitness-identification evidence was sufficient to support Johnson's conviction for first-degree murder because, viewed in the light most favorable to the prosecution, a rational trier of fact could credit the positive identifications by Thomas, Mixon, and Washington.
4. A reviewing court may not rely on social-science research or other evidentiary material that was not admitted at trial to assess witness credibility or reverse a conviction for insufficient evidence.
5. A reviewing court may not rely on the jury's acquittal on one count to discredit evidence supporting a conviction on another count when evaluating sufficiency.

KEY QUOTATIONS

“The Biggers test for determining whether an identification should have been suppressed simply does not apply to a review of the sufficiency of the evidence.” (¶ 65)

“The majority should have followed the familiar Jackson standard that dictates a reviewing court may conclude the identification evidence is insufficient only where the record evidence compels the conclusion that no reasonable person could accept it beyond a reasonable doubt.” (¶ 72)

“Review of the sufficiency of the evidence at trial “must be limited to evidence actually admitted at trial, and judicial notice cannot be used to introduce new evidentiary material not considered by the fact finder during its deliberations.”” (¶ 93)

“Moreover, “[t]he question whether the evidence is constitutionally sufficient is of course wholly unrelated to the question of how rationally the verdict was actually reached.”” (¶ 100)

FACTUAL BACKGROUND

On April 24, 2017, Taurean Tyler and DeAngelo Mixon were shot from behind by an assailant while walking toward a friend's home; Tyler died and Mixon survived. Three eyewitnesses—Tristan Thomas, Mixon, and Janeese Washington—identified Antrell Johnson as the shooter shortly after the incident, although Thomas and Mixon attempted to recant at trial. A fourth eyewitness, Robert Laster, did not identify Johnson and later selected someone else in an in-person lineup. The State presented no physical evidence or motive evidence, and the jury convicted Johnson of Tyler's murder but acquitted him of Mixon's attempted murder.

PROCEDURAL HISTORY

A Cook County jury convicted Johnson of first-degree murder for killing Taurean Tyler, acquitted him of attempted first-degree murder of DeAngelo Mixon, and found that he personally discharged the firearm. The circuit court denied Johnson's posttrial motion and imposed a 55-year sentence. The appellate court reversed the conviction, applying the *Neil v. Biggers* identification-admissibility framework to sufficiency review. The Illinois Supreme Court reversed the appellate judgment and remanded for consideration of Johnson's ineffective-assistance claim.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The cause is remanded to the appellate court to consider Johnson's ineffective-assistance-of-counsel claim.

CASES CITED

- *Neil v. Biggers*, 409 U.S. 188 (1972)
- *Jackson v. Virginia*, 443 U.S. 307 (1979)
- *Manson v. Brathwaite*, 432 U.S. 98 (1977)
- *Perry v. New Hampshire*, 565 U.S. 228 (2012)
- *People v. Sutherland*, 223 Ill. 2d 187, 242 (2006)
- *People v. Jackson*, 2020 IL 124112, ¶¶ 64, 67

- People v. Gray, 2017 IL 120958, ¶¶ 35-36
- People v. Cunningham, 212 Ill. 2d 274, 280 (2004)
- People v. Slim, 127 Ill. 2d 302, 307-09 (1989)
- People v. Piatkowski, 225 Ill. 2d 551, 567 (2007)
- People v. Denson, 2014 IL 116231, ¶ 17
- People v. Holmes, 141 Ill. 2d 204, 242 (1990)
- People v. Brooks, 187 Ill. 2d 91, 124-34 (1999)
- People v. Simmons, 2016 IL App (1st) 131300, ¶ 89
- People v. Thompson, 2016 IL App (1st) 133648, ¶ 35
- People v. Wheeler, 226 Ill. 2d 92, 114-15 (2007)
- People v. Cline, 2022 IL 126383, ¶¶ 32-33
- Herrera v. Collins, 506 U.S. 390, 402 (1993)
- People v. Lerma, 2016 IL 118496, ¶¶ 23-26
- People v. Heineman, 2023 IL 127854, ¶ 74
- United States v. Powell, 469 U.S. 57, 67 (1984)
- People v. Hale, 2013 IL 113140, ¶ 20
- People v. Price v. Philip Morris, Inc., 2015 IL 117687, ¶ 38
- Blumenthal v. Brewer, 2016 IL 118781, ¶ 29
- Yakich v. Aulds, 2019 IL 123667, ¶ 13
- People v. Coulson, 13 Ill. 2d 290, 296, 298 (1958)
- People v. Harris, 57 Ill. 2d 228, 231 (1974)
- People v. Boyd, 2021 IL App (1st) 182584, ¶ 57
- People v. Thomas, 171 Ill. 2d 207, 219 (1996)