

APPELLATE COURT OF ILLINOIS, FIRST DISTRICT, FIFTH DIVISION

In re S.R.

2025 IL App (1st) 250218 · No. 1-25-0218 · Decided November 21, 2025

SUMMARY

The Illinois Appellate Court, First District, reviews a juvenile delinquency case involving weapons offenses and the designation of S.R. as a violent juvenile offender. The opinion addresses whether the circuit court properly declined to accept S.R.'s guilty plea before parental notification, whether a prior guilty plea constituted a qualifying adjudication, the sufficiency of proof concerning the predicate offense, and sentencing credit. The excerpt concludes that the circuit court acted within its discretion regarding the guilty plea and that any error concerning proof of the predicate offense was harmless.

CASE DETAILS

COURT	Appellate Court of Illinois, First District, Fifth Division
WRITING FOR THE COURT	Presiding Justice Mitchell; Justice Tailor; Justice Oden Johnson
JURISDICTION	Illinois Appellate Court, First District
DECIDED	November 21, 2025
DOCKET	1-25-0218
DISPOSITION	affirmed
PROCEDURAL POSTURE	S.R. appealed after a bench trial in which the circuit court adjudicated him delinquent, adjudicated him a violent juvenile offender and ward of the court, committed him to the Illinois Department of Juvenile Justice, and denied additional presentence custody credit.
STANDARD OF REVIEW	Refusal to accept a guilty plea is reviewed for abuse of discretion; statutory interpretation is reviewed de novo; factual findings concerning a predicate or qualifying offense are reviewed under the manifest-weight-of-the-evidence standard; and sentencing-credit entitlement is reviewed under the applicable statutory standard.
PRECEDENTIAL VALUE	published precedential opinion
PARTIES	S.R. v. The People of the State of Illinois

TOPICS

- appellate procedure
- statutory interpretation
- criminal procedure
- sentencing
- due process

PRACTICE AREAS

juvenile law

criminal procedure

appellate procedure

sentencing

QUESTIONS PRESENTED

1. Whether the circuit court abused its discretion by declining to accept S.R.'s otherwise knowing and voluntary guilty plea before his parents had been notified.
2. Whether a guilty plea, before sentencing or adjudication of wardship, constitutes a prior adjudication of delinquency sufficient to support violent juvenile offender status.
3. Whether the State's violent juvenile offender notice was facially deficient for failing to specify the class of the predicate offense.
4. Whether the State proved the predicate qualifying offense and whether the circuit court improperly relied on personal knowledge of the prior case.
5. Whether S.R. was entitled to 139 days of presentence custody credit for time he was detained while simultaneously subject to this case and another juvenile case.

HOLDINGS

1. The circuit court acted within its discretion in declining to accept S.R.'s guilty plea before his parents had been notified. The Juvenile Court Act does not impose a categorical prohibition on accepting such a plea, but parental participation is an important procedural protection and the decision is entrusted to the trial court's case-by-case discretion.
2. A juvenile's guilty plea alone satisfies the requirement in 705 ILCS 405/5-820(a) that the minor have been previously 'adjudicated a delinquent minor.' Sentencing or adjudication of wardship is not required for the plea to qualify as the predicate adjudication.
3. The State's notice was sufficient even though it did not separately identify the class of the predicate offense. Section 5-820(b) requires written notice of the State's intention to prosecute the minor as a violent juvenile offender, not a detailed description of the predicate offense.
4. The circuit court's finding that S.R. had a qualifying predicate offense was not against the manifest weight of the evidence. Although the certified statement of conviction/disposition alone did not establish the offense class or firearm connection, the record contained the prior plea transcript and S.R.'s judicial admissions establishing that he pleaded guilty to a Class 2 felony involving possession of a machine gun.
5. S.R. was entitled to 139 days of presentence credit because a juvenile detained simultaneously on two unrelated charges receives credit for that time in both cases. The appellate court directed the circuit clerk to amend the mittimus to reflect 139 days rather than 46 days.

KEY QUOTATIONS

"There is not a categorical rule that precludes a circuit court from accepting a juvenile's plea of guilty in the absence of parental notification. It is a matter entrusted to the wisdom and discretion of trial judges to be made on a case-by-case basis." (¶ 16)

“The guilty plea alone satisfies the statutory requirement.” (¶ 20)

“The plain language only requires “notice of intention.”” (¶ 25)

“It proves nothing: neither the class of the offense nor its connection to the use of a firearm.” (¶ 30)

“A defendant simultaneously in presentence custody on two unrelated charges is entitled to credit for that time in both cases.” (¶ 38)

FACTUAL BACKGROUND

Police observed 17-year-old S.R. attempting to place a handgun with an automatic switch into his jacket as he entered a Chicago gangway. He fled, dropped the handgun, and was arrested. At the time, he was on probation in one juvenile case and had pleaded guilty to a Class 2 felony involving possession of a machine gun in another case but had not yet been sentenced. After the circuit court declined to accept his guilty plea in this case without parental notification, the State filed a violent juvenile offender notice; S.R. was later adjudicated delinquent and committed to the Department of Juvenile Justice.

PROCEDURAL HISTORY

S.R. was charged in the Circuit Court of Cook County with weapons offenses. The circuit court declined to accept his guilty plea at his initial appearance because his parents had not been notified, later allowed the State to prosecute him as a violent juvenile offender, adjudicated him delinquent after a bench trial, and committed him to the Department of Juvenile Justice. The appellate court affirmed the judgment but modified the sentence to award 139 days of presentence credit instead of 46 days.

DISPOSITION

affirmed

REMAND INSTRUCTIONS

The judgment was affirmed and modified. The clerk of the Circuit Court of Cook County was directed to amend the mittimus to reflect 139 days of presentence credit instead of 46 days.

CASES CITED

- People v. Peterson, 311 Ill. App. 3d 38, 45-46 (1999)
- People v. Henderson, 211 Ill. 2d 90, 103 (2004)
- In re M.W., 232 Ill. 2d 408, 426-27 (2009)
- In re C.R.H., 163 Ill. 2d 263, 268-71 (1994)
- In re Gault, 387 U.S. 1, 33-34 (1967)
- In re Veronica C., 239 Ill. 2d 134, 144-45 (2010)
- In re Michael D., 2015 IL 119178, ¶ 13
- In re J.N., 91 Ill. 2d 122, 128 (1982)

- In re Stokes, 108 Ill. App. 3d 637, 642 (1982)
- In re S.P., 297 Ill. App. 3d 234, 236-39 (1998)
- In re Dave L., 2017 IL App (1st) 170152, ¶ 39
- In re M.G., 301 Ill. App. 3d 401, 404, 408 (1998)
- People v. Salem, 2016 IL App (3d) 120390, ¶ 45
- People v. Holmes, 405 Ill. App. 3d 179, 184-86 (2010)
- In re Beasley, 66 Ill. 2d 385, 390-91 (1977)
- People v. McDonald, 168 Ill. 2d 420, 451 (1995)
- People v. West, 187 Ill. 2d 418, 436 (1999)
- People v. Deleon, 227 Ill. 2d 322, 332 (2008)
- People v. Morgan, 2025 IL 130626, ¶ 20
- People v. Robinson, 167 Ill. 2d 53, 71-76 (1995)
- People v. Brown, 2023 IL App (3d) 210460, ¶ 98
- People v. Davis, 65 Ill. 2d 157, 165 (1976)
- People v. Wallenberg, 24 Ill. 2d 350, 354 (1962)
- People v. Petrov, 2023 IL App (1st) 160498, ¶ 59
- People v. Feldman, 409 Ill. App. 3d 1124, 1128 (2011)
- People v. Walls, 2022 IL 127965
- In re Estate of Funk, 221 Ill. 2d 30, 86 (2006)
- In re E.W., 2015 IL App (5th) 140341, ¶ 40
- In re Jabari C., 2011 IL App (4th) 100295, ¶ 26
- In re Rakim V., 398 Ill. App. 3d 1057, 1059 (2010)
- People v. Robinson, 172 Ill. 2d 452, 463 (1996)
- People v. Chamberlain, 354 Ill. App. 3d 1070, 1074-75 (2005)
- People v. Centeno, 394 Ill. App. 3d 710, 715 (2009)