

APPELLATE COURT OF ILLINOIS, FOURTH DISTRICT

People v. Jones

2026 IL App (4th) 250581 · No. 4-25-058 · Decided June 24, 2026

SUMMARY

The Illinois Appellate Court, Fourth District, affirmed Charles Jones’s convictions on eight counts of predatory criminal sexual assault of a child and his cumulative 48-year sentence. The court held that the victim’s hearsay statements concerning uncharged conduct were admissible under section 115-10 of the Code of Criminal Procedure and rejected Jones’s ineffective-assistance claims concerning impeachment.

CASE DETAILS

COURT	Appellate Court of Illinois, Fourth District
WRITING FOR THE COURT	Justice Grischow; Justice Zenoff; Justice Vancil
JURISDICTION	Illinois Appellate Court, Fourth District
DECIDED	June 24, 2026
DOCKET	4-25-058
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed his convictions and sentence following a jury trial and denial of an amended posttrial motion for a new trial.
STANDARD OF REVIEW	The admissibility requirements under section 115-10 are reviewed for abuse of discretion. Plain-error review first requires a clear or obvious error. Ineffective-assistance claims are reviewed de novo, while the trial court's factual findings are disturbed only if they are against the manifest weight of the evidence.
PRECEDENTIAL VALUE	Published Illinois appellate opinion
PARTIES	Charles Jones v. The People of the State of Illinois

TOPICS

- hearsay
- evidence
- ineffective assistance
- criminal procedure
- appellate procedure

PRACTICE AREAS

- criminal law
- evidence
- criminal procedure
- appellate procedure
- ineffective assistance of counsel

QUESTIONS PRESENTED

1. Whether the circuit court abused its discretion by admitting the child's hearsay statements concerning uncharged sexual conduct under section 115-10 of the Illinois Code of Criminal Procedure.
2. Whether the forfeited hearsay claim warranted review under the first prong of the plain-error doctrine.
3. Whether trial and posttrial counsel provided ineffective assistance by failing to impeach the child's credibility with alleged inconsistencies concerning Jones's mother, Bailey, and Jones's son.

HOLDINGS

1. Section 115-10(a)(2) permits admission of a child victim's out-of-court statements describing matters or details pertaining to charged sexual acts, including statements about the victim's relationship with the defendant and uncharged conduct that provides context for a pattern of abuse occurring over an extended period. The challenged statements were therefore admissible.
2. Jones forfeited his hearsay objection by failing to object at trial and raise the issue in a posttrial motion, and he failed to establish a clear or obvious error. The court therefore declined to excuse the forfeiture under the first prong of plain error.
3. Counsel was not ineffective for failing to introduce evidence that Jones's mother had died before the alleged abuse because Jones failed to show a reasonable probability that the evidence would have changed the verdict.
4. Counsel was not ineffective for failing to call Bailey to testify that she had never met the child because Jones failed to show a reasonable probability that Bailey's testimony would have changed the outcome.
5. Counsel was not ineffective for declining to emphasize the child's statement that Jones's son had sexually assaulted her because the record supported a reasonable trial strategy and Jones failed to establish prejudice.

KEY QUOTATIONS

“under section 115-10(a)(2) of the Code, a ‘matter or detail pertaining to any act which is an element of an offense’ [citation] may include facts about the victim’s relationship with the defendant if relevant to explain the context within which the alleged charged acts occurred.” (¶ 38)

“Strickland requires a defendant to ‘affirmatively prove’ that prejudice resulted from counsel’s errors.” (¶ 49)

FACTUAL BACKGROUND

Jones was convicted of eight counts of predatory criminal sexual assault of his young daughter, involving alleged sexual acts over a period from April 2017 through November 2018. Before trial, the circuit court admitted the child's out-of-court statements to medical providers, her mother, and a forensic interviewer under section 115-10 of the Illinois Code of Criminal Procedure. At trial, the child gave limited and partially inconsistent testimony but her prior statements described repeated abuse by Jones in multiple locations; the State also presented medical, interview, and law-enforcement evidence. Jones argued on appeal that hearsay concerning uncharged conduct should have been excluded and that counsel should have used additional inconsistencies to impeach the child.

PROCEDURAL HISTORY

A Winnebago County jury found Jones guilty of eight counts of predatory criminal sexual assault of a child. The circuit court denied his motions for a directed verdict and his amended motion for a new trial, then sentenced him to an aggregate 48-year prison term. Jones appealed, challenging admission of hearsay statements concerning uncharged conduct and alleging ineffective assistance of trial and posttrial counsel.

DISPOSITION

affirmed

CASES CITED

- People v. Jackson, 2022 IL 127256
- People v. Johnson, 2024 IL 130191
- People v. Prather, 2022 IL App (4th) 210609
- People v. Safranek, 2025 IL App (4th) 240967
- In re E.H., 224 Ill. 2d 172 (2006)
- People v. Butler, 2025 IL 130988
- People v. Anderson, 225 Ill. App. 3d 636 (1992)
- People v. Kinnett, 287 Ill. App. 3d 709 (1997)
- People v. Monroe, 366 Ill. App. 3d 1080 (2006)
- People v. Boling, 2014 IL App (4th) 120634
- People v. Schmitt, 204 Ill. App. 3d 820 (1990)
- People v. Jones, 2020 IL App (4th) 190909
- Strickland v. Washington, 466 U.S. 668 (1984)
- People v. Caballero, 126 Ill. 2d 248 (1989)
- People v. Houston, 229 Ill. 2d 1 (2008)
- People v. Johnson, 2021 IL 126291
- People v. Patterson, 2014 IL 115102
- People v. Gray, 2017 IL 120958
- People v. Logan, 2022 IL App (4th) 210492
- People v. Brown, 2024 IL 129585
- People v. Westfall, 2018 IL App (4th) 150997
- People v. Simpson, 2015 IL 116512
- People v. Jones, People v. Jones, 2023 IL 127810
- People v. Quezada, 2024 IL 128805
- People v. Gilker, 2023 IL App (4th) 220914

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