

NOTICE
This Order was filed under Supreme Court Rule 23 and is not precedent except in the limited circumstances allowed under Rule 23(e)(1).

2026 IL App (4th) 250593-U
NO. 4-25-0593
IN THE APPELLATE COURT
OF ILLINOIS
FOURTH DISTRICT

FILED
August 21, 2026
Carla Bender
4th District Appellate
Court, IL

<i>In re</i> COMMITMENT OF STEVEN C. CRABB	)	Appeal from the
	)	Circuit Court of
(The People of the State of Illinois,	)	Sangamon County
Petitioner-Appellee,	)	No. 10MR138
v.	)	
Steven C. Crabb,	)	
Respondent-Appellant)	)	Honorable
(The Department of Human Services,	)	Gail L. Noll,
Non-Party Appellee.)	)	Judge Presiding.

JUSTICE HARRIS delivered the judgment of the court.
Justices Zenoff and Vancil concurred in the judgment.

ORDER

¶ 1 *Held:* The trial court did not err in denying respondent’s *pro se* motions seeking modification of the civil commitment order entered under the Sexually Violent Persons Commitment Act (725 ILCS 207/1 *et seq.* (2014)).

¶ 2 A jury found beyond a reasonable doubt that respondent, Steven C. Crabb, was a sexually violent person (SVP) under the Sexually Violent Persons Commitment Act (Act) (725 ILCS 207/1 *et seq.* (West 2014)), and the trial court subsequently entered an order committing him to the custody of the Department of Human Services (Department) for institutional treatment and care in a secure facility. Respondent filed *pro se* motions requesting the court to modify the commitment order to (1) identify new treatment goals and (2) direct the Department to provide him with individual treatment rather than group therapy. The court denied respondent’s motions after a hearing, and respondent appealed. On appeal, respondent argues the court erred in

denying his motions. We affirm.

¶ 3

I. BACKGROUND

¶ 4

In 2010, as respondent was nearing release from prison for various sex offenses he had committed in 1996, the State filed a petition under the Act alleging respondent was an SVP and requesting the trial court enter an order committing him to a secure facility for institutional treatment. Following a jury trial, respondent was found to be an SVP beyond a reasonable doubt, and, in 2015, the court entered an order committing him to the Department's custody for institutional treatment and care in a secure facility. In the commitment order, the court did not identify any specific treatment goals, nor did it direct the Department to provide treatment in a certain manner.

¶ 5

Between the time he was committed and 2025, the Department reexamined respondent's mental condition on an annual basis and submitted a written report of each examination to the trial court, as required under the Act. See *id.* § 55(a) (requiring the Department to conduct an annual reexamination of the respondent's mental condition to determine his progress in treatment and whether he remains an SVP). According to the "Mental Health History" section included in each report, respondent had been diagnosed with post-traumatic stress disorder (PTSD) while incarcerated. However, the only information relevant to the PTSD diagnosis consists of the following sentence: "[Respondent's] presenting symptoms seemed to alter somewhat over time: early in his incarceration, for example, he reported, hearing voices, later, flashbacks indicative of PTSD." The reports also indicate that respondent "does not appear to have been, based on available records, a particularly reliable source of information in regard to his mental health history." Since being committed to the Department's custody, respondent has never been found to meet the criteria for PTSD by a qualified clinical

psychologist or sex offender evaluator.

¶ 6 In 2025, respondent filed the instant *pro se* motions requesting the trial court to modify the commitment order to identify new treatment goals and impose the condition that the Department be required to provide him with individual treatment rather than group therapy. Specifically, he asked the court to “revisit the commitment order[to] identify PTSD and trauma as a treatment goal” because he had been diagnosed with PTSD while incarcerated. He further maintained that he needed to receive individual treatment because his PTSD diagnosis prevented him from participating in group therapy at the secure facility. Both the State and the Department filed responses opposing respondent’s motions.

¶ 7 The trial court conducted a hearing on respondent’s motions, although no transcript of the proceeding has been included in the record on appeal. The court denied respondent’s motions by way of a June 3, 2025, docket entry. The court determined there was “no legal foundation for [it] to revisit the commitment order at this time.” It further concluded that it lacked authority under the Act to order the Department to provide individual treatment to those in its care because the “Act gives [the Department] the responsibility to determine the nature of [the] facility and manner in which treatment will be provided.” Respondent appealed.

¶ 8 II. ANALYSIS

¶ 9 On appeal, respondent argues the trial court erred in denying his motions to revisit the commitment order to identify PTSD as a treatment goal and direct the Department to provide him with individual treatment where he established that he was “not receiving the one-on-one individualized treatment he need’s [sic] for [PTSD] that is triggered by disclosure group therapy.” In support of his argument, he relies on *In re Detention of Hayes*, 321 Ill. App. 3d 178 (2001), and *In re Commitment of Pieroni*, 2025 IL App (1st) 231148. Relevant to this appeal is

the extent of a trial court's authority under the Act. "We consider questions regarding statutory authority *de novo*." *People v. Alexander*, 369 Ill. App. 3d 955, 957 (2007).

¶ 10

A. The Law

¶ 11

"The Act [citation] allows the State to extend the incarceration of a criminal defendant beyond the time he would otherwise be entitled to release if the defendant is found to be sexually violent." *In re Detention of Hardin*, 391 Ill. App. 3d 211, 216 (2009). "The provisions of the Act are triggered when a defendant who has been convicted of a sexually violent offense *** is nearing release or discharge from custody." *In re Detention of Samuelson*, 189 Ill. 2d 548, 553 (2000). At this time, the State may file a petition alleging the respondent is an SVP. 725 ILCS 207/15 (West 2010). Upon the filing of the petition, the trial court must conduct a hearing to determine whether probable cause exists to believe the respondent is an SVP. *Id.* § 30(b). If the court finds probable cause exists, it must then order the respondent be taken into custody pending trial and transferred "to an appropriate facility for an evaluation as to whether the person is [an SVP]." *Id.* § 30(c). At trial, the State has the burden of proving the respondent is an SVP beyond a reasonable doubt. 725 ILCS 207/35(d) (West 2014). If the State meets its burden, "the court shall order the person to be committed to the custody of the Department for control, care and treatment until such time as the person is no longer [an SVP]." *Id.* § 40(a).

¶ 12

Once a person has been adjudicated an SVP, the trial court must next conduct a dispositional hearing and enter a commitment order specifying "either institutional care in a secure facility *** or conditional release." *Id.* § 40(b)(2). Section 40 defines the limits of the court's authority in crafting a commitment order. See, e.g., *In re M.M.*, 156 Ill. 2d 53, 66 (1993) ("When a court's power to act is controlled by statute, *** courts exercising jurisdiction over

such matters must proceed within the strictures of the statute.”). It empowers the court, when necessary, to “order the Department to conduct a predisposition investigation or a supplementary mental examination, or both, to assist the court in framing the commitment order.” *Id.* § 40(b)(1). It also directs the court to consider, in part, “the person’s mental history and present mental condition, and what arrangements are available to ensure that the person has access to and will participate in necessary treatment.” *Id.* § 40(b)(2). Section 40 further provides that “[t]he Department shall arrange for control, care and treatment of the person in the least restrictive manner consistent with the requirements of the person and in accordance with the court’s commitment order.” *Id.* Once an SVP has been committed, it is the Department’s duty under the Act to place the person “at a [secure] facility.” *Id.* § 50(a). It is also the Department’s duty to “operate the facility *** and *** provide by rule for the nature of the facility, the level of care to be provided in the facility, and the custody and discipline of persons placed in the facility.” *Id.* § 50(b).

¶ 13 In *Hayes*, the Second District examined the language of sections 40 and 50 of the Act to determine “[t]he scope of a trial court’s authority to impose conditions on a[n SVP’s] commitment.” *Hayes*, 321 Ill. App. 3d at 192. The *Hayes* court reached the following conclusion:

“In conclusion, we find that the Act contemplates an interplay between the courts and the Department and an individualized plan of treatment for [SVPs] committed to a secure facility. Accordingly, the trial court may make findings of fact regarding an individual’s mental condition and enter reasonable orders regarding the types of treatment required. However, it is the Department’s duty under the Act to determine the nature of the secure facility and the manner in

which treatment will be provided to those individuals detained or committed. ***

In other words, the trial court may identify the goals for a[n SVP's] treatment, but the Department has the duty of determining the means for achieving those goals."

Id. at 196.

¶ 14 Under the specific facts of *Hayes*, the Second District held "that the trial court acted within its authority when it ordered the Department to provide treatment *in accordance with* [a specific expert's] report." (Emphasis in original.) *Id.* at 195. The *Hayes* court reasoned that section 40 "authorize[d] a trial court to identify an individual's specific treatment needs and frame a commitment order consistent with those needs." *Id.* at 194. However, the *Hayes* court also found that in directing the Department to employ a specific expert to oversee the respondent's treatment, the trial court "did exceed its authority to impose reasonable conditions on [the] respondent's commitment" because the court lacked the statutory authority "to direct the manner in which the Department operates its facility." *Id.* at 195.

¶ 15 In *Pieroni*, the trial court denied the respondent's request to have it revisit the commitment order "to identify PTSD and trauma as treatment goals" and to order the Department to provide him with "individual treatment." *Pieroni*, 2025 IL App (1st) 231148, ¶ 28. On appeal, the respondent highlighted the Second District's use of the phrase "individualized treatment" in *Hayes* to "argue[] he [was] entitled to individual treatment *** rather than group therapy." *Id.* ¶ 30. The First District rejected this argument, holding instead that "an order requiring [the Department] to provide individual one-on-one services, rather than treatment in a group setting," would exceed the court's authority under the Act and "infringe on [the Department's] authority to determine how treatment is provided." *Id.* ¶ 33. However, the *Pieroni* court held that the trial court had erred in denying the respondent's request to have it

revisit the commitment order to identify PTSD as a treatment goal where “[t]he record [was] replete with evidence” that the respondent suffered from PTSD. *Id.* ¶ 37. In so holding, the First District noted that the Act authorizes courts, in their discretion, to “establish goals based on recommendations from doctors stemming from *** a mandatory examination under the Act.” *Id.* ¶ 35; see 725 ILCS 207/55(a) (West 2024) (requiring the Department to conduct an annual reexamination of the respondent’s mental condition to determine his progress in treatment and whether he remains an SVP).

¶ 16 B. This Case

¶ 17 As indicated, respondent argues the trial court erred in declining to revisit the commitment order to identify PTSD as a treatment goal and order individual treatment where he established he was “not receiving the one-on-one individualized treatment he need’s [sic] for [PTSD] that is triggered by disclosure group therapy.”

¶ 18 First, we reject generally the argument that a trial court commits error when it denies a respondent’s request that it order the Department to provide him with individual treatment rather than group therapy. The First District rejected this precise argument in *Pieroni* when it held that “an order requiring [the Department] to provide individual one-on-one services, rather than treatment in a group setting,” would exceed the court’s authority under the Act and “infringe on [the Department’s] authority to determine how treatment is provided.” *Pieroni*, 2025 IL App (1st) 231148, ¶ 33. We find the First District’s reasoning in *Pieroni* persuasive and agree with its holding, and we therefore reject respondent’s argument.

¶ 19 We likewise reject respondent’s argument that the trial court erred in denying his request to identify PTSD as a treatment goal in the commitment order. Although we agree with respondent that trial courts have the authority to identify reasonable treatment goals in a

commitment order, we nonetheless find the court did not abuse its discretion in declining to do so here. See *Hayes*, 321 Ill. App. 3d at 195 (holding that under section 40(b)(2) of the Act, “a trial court may exercise its discretion to impose reasonable conditions requiring specific treatment in an order committing an individual to a secure facility”); see also *People v. Rexroat*, 354 Ill. App. 3d 447, 451 (2004) (“Although *Hayes* dealt only with an initial commitment order, we see no reason why a[n SVP] cannot petition for changes in his treatment based on recommendations stemming from a mandatory reexamination.”). We note that respondent relies on *Pieroni* in support of his argument. In that case, as discussed, “[t]he record [wa]s replete with evidence that Pieroni has PTSD.” *Pieroni*, 2025 IL App (1st) 231148, ¶ 37. Here, on the other hand, the only evidence in the record that respondent has PTSD is a statement in the annual reexamination reports that he was diagnosed with the disorder at some point while incarcerated between 1996 and 2010. Moreover, because respondent failed to include a transcript of the proceedings on his motions, we will assume the trial court had a sufficient basis for its decision. See, e.g., *Foutch v. O’Bryant*, 99 Ill. 2d 389, 391-92 (1984) (stating that “an appellant has the burden to present a sufficiently complete record of the proceedings,” and “[a]ny doubts which may arise from the incompleteness of the record will be resolved against the appellant”). Accordingly, we find the court did not abuse its discretion in declining to revisit the commitment order to identify PTSD as a treatment goal.

¶ 20

III. CONCLUSION

¶ 21

For the reasons stated, we affirm the trial court’s judgment.

¶ 22

Affirmed.