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2026 IL App (3d) 240458-U

Order filed October 27, 2026

IN THE
APPELLATE COURT OF ILLINOIS
THIRD DISTRICT

2026

THE PEOPLE OF THE STATE OF ILLINOIS,	)	Appeal from the Circuit Court
	)	of the 18th Judicial Circuit,
	)	Du Page County, Illinois,
Plaintiff-Appellee,	)	
	)	Appeal No. 3-24-0458
v.	)	Circuit No. 20-CF-2111
	)	
LAMAR M. MEAKENS,	)	Honorable
	)	Ann Celine O'Hallaren Walsh,
Defendant-Appellant.	)	Judge, Presiding.

JUSTICE HOLDRIDGE delivered the judgment of the court.
Presiding Justice Hettel and Justice Peterson concurred in the judgment.

ORDER

¶ 1 *Held:* (1) The evidence was sufficient to sustain the defendant's convictions for reckless discharge of a firearm and unlawful use of a weapon by a felon. (2) The unlawful use of a weapon by a felon statute under which the defendant was convicted is constitutional on its face.

¶ 2 The defendant, Lamar M. Meakens, appeals from his convictions for reckless discharge of a firearm and unlawful use of a weapon by a felon (UUWF). The defendant argues (1) the evidence was insufficient to sustain his convictions and (2) the UUWF statute under which he was convicted is unconstitutional on its face.

¶ 3

I. BACKGROUND

¶ 4

On November 17, 2020, the State first brought various charges against the defendant. After the filing of the charging instruments and dismissal of charges, the State pursued two counts of reckless discharge of a firearm (720 ILCS 5/24-1.5(a) (West 2020)), six counts of UUWF (*id.* § 24-1.1(a)), and unlawful possession of a controlled substance (cocaine) (720 ILCS 570/402(a)(2)(A) (West 2020)). On December 12, 2023, the matter proceeded to a bench trial where the defendant represented himself.

¶ 5

A. The State's Evidence

¶ 6

Virginia Valenzuela testified she lived in an apartment complex near Community Park. On November 4, 2020, at approximately 11:45 p.m., she was sleeping when her children ran into her bedroom stating that they heard gunshots. Valenzuela told her children to calm down and go to sleep. When Valenzuela arrived home after work the next day at approximately 2:30 p.m., she and her husband observed multiple shell casings in the parking lot and contacted the police. Officer Ron Mozalewski with the Carol Stream Police Department collected seven shell casings, three from the parking lot and four from a grassy area next to the curb. All casings were identified as coming from a .40-caliber Smith & Wesson handgun. On November 6, at 1:36 a.m., Valenzuela was asleep when she heard approximately five gunshots. She moved to the floor and looked out her window and saw an individual from the waist down enter the driver's seat of a vehicle. She thought the gunshots were next to her bed as they were "very close." Valenzuela saw the vehicle move and observed it was a black SUV with roof racks. Officer Christina Kotnaur arrived on scene and collected seven shell casings, all which had a manufacturer imprint of "USA 9MM." Martha Cruz, Valenzuela's daughter, testified she heard gunshots and saw the same black SUV in the parking lot from her window on the nights of November 4 and 6.

¶ 7 The police obtained video footage from the apartment complex's surveillance cameras. The footage from November 4 from 11:44 to 11:56 p.m., and November 6 from 1:21 to 1:34 a.m., showed a small black SUV driving the same path on both days. The SUV had chrome roof racks and dark wheels, but the license plate was unable to be identified. In both videos, the driver could be seen exiting the SUV in the parking lot. The driver was wearing light-colored clothing, which included a sweatshirt with the hood up. The distance and low resolution of the video obscured specific features, such as the driver's age, race, and gender. On November 4, the driver parked, exited the vehicle, and walked while looking around outside. The driver returned to the vehicle, opened the driver's door, and bent down toward the door. The driver then walked to face Community Park and fired multiple gunshots. The apartment where Valenzuela and her family lived was behind the driver. The driver reentered the SUV and left. Detective Darren Boshart testified that Community Park was a large park with playgrounds, basketball courts, and open fields. There were apartment complexes to the north, northeast, and east. He stated it was a densely populated area and a shot fired from a firearm at the edge of the park could travel up to a mile and strike someone on the other side of the park or parking lot.

¶ 8 Detective James Busch testified that, on the morning of November 12, 2020, he went to the apartment complex and observed a black Chevy Trax with a silver roof rack and dark wheels in a parking stall. The vehicle was unoccupied and registered to Dasha O'Leary. He conducted follow-up surveillance that afternoon and observed the vehicle drive into the lot and park. Busch saw the defendant exit the vehicle, retrieve a bag, and enter an apartment building. The next day, other officers observed the vehicle enter the parking lot. The defendant then entered an apartment building and used a key to enter apartment 112. The property manager reported that O'Leary lived in apartment 112 and O'Leary's boyfriend had been staying with her.

¶ 9 On November 17 at 5:15 a.m., officers with the Illinois State Police executed a search warrant on the apartment. Both the defendant and O’Leary were present, and O’Leary’s young son was in the second bedroom. The main bedroom had a large closet with women’s clothing on the right side and men’s clothing on the left side. On the side with the men’s clothing, two loaded handguns—a Glock handgun and a Smith & Wesson revolver—were immediately visible underneath a white hooded sweatshirt. Behind a stack of clothing there was also a loaded Smith & Wesson semiautomatic handgun. A windbreaker inside the closet had a pocket containing cash, credit cards, and the defendant’s driver’s license. A shower caddy on the shelf contained Glock magazines, several rounds of loose ammunition, and multiple small plastic bags of suspected cocaine. The ammunition was the same brand and caliber of the shell casings found after the November 6 shooting incident. A Mossberg high-powered rifle was located in the closet leaning against the wall. Officers also found a large plastic bag containing two smaller bags of suspected cocaine in a kitchen cabinet.

¶ 10 O’Leary told officers that the defendant stayed with her in the apartment most of the time. She identified a blue iPhone found on the bed as the defendant’s as well as clothing and personal items on the left side of the main bedroom’s closet. O’Leary also stated that the drugs seized in her apartment belonged to the defendant. She reported that she saw the defendant use cocaine in her apartment and he had driven her Chevy Trax. However, O’Leary did not testify at trial or provide a sworn statement. A search of the Chevy Trax revealed a Firestone invoice for the vehicle identifying the customer as Johnny Meakens with O’Leary’s address. The court took judicial notice that the defendant had “Johnny” tattooed on his neck under his right ear.

¶ 11 Forensic testing provided the bags of white powder were cocaine and weighed over 20 grams. As to the seven shell casings recovered from the November 4 shooting, they were fired

from the Smith & Wesson .40-caliber handgun. The seven shell casings recovered from the November 6 shooting were fired from the Glock 43 9-millimeter handgun. DNA testing of the firearms showed as follows: Smith & Wesson .40-caliber handgun (swab of the trigger: assumed three donors, second profile consistent with the defendant, 41 trillion times more likely to be the defendant rather than unknown, unrelated donor; swab of the slide: assumed two donors, the second profile is consistent with the defendant, 7.7 million times more likely to be the defendant rather than unknown, unrelated donor); Glock 43 9-millimeter handgun (swab of the grip: assumed three donors, second profile consistent with the defendant, 17,000 times more likely to be the defendant rather than unknown, unrelated donor; swab of the slide: assumed three donors, the first profile is consistent with the defendant, 46 quadrillion times more likely to be the defendant rather than unknown, unrelated donor); Smith & Wesson .357-caliber revolver (swab of the trigger: assumed four donors, second profile consistent with the defendant, 1.8 billion times more likely to be the defendant rather than unknown, unrelated donor); and Mossberg 715T .22-caliber long rifle (swab of the grip: assumed four donors, second profile consistent with the defendant, 860 sextillion times more likely to be the defendant rather than unknown, unrelated donor; swab of the slide: assumed four donors, the second profile is consistent with the defendant, 45 million times more likely to be the defendant rather than unknown, unrelated donor). Evidence was presented that a secondary transfer, where an individual's DNA is present on an item that they did not directly touch, was possible.

¶ 12 The blue iPhone recovered had the owner listed as “Johnny’s iPhone” with the phone number the defendant listed as his number in court filings. The phone had a Facebook Messenger account for “Bruce Waynee” with messages where the sender identified himself as “Lamar.” A Snapchat account for IEYE_ARMANIG was on the phone and linked with the same phone number

and the e-mail johnnyya74@yahoo.com. Voicemails on the phone were left for “Lamar Meakens.” The browser history for the phone showed searches on and around the dates of the shootings for “Glock 36 extended clip,” “Glock 36,” “Mossberg 715T,” “Glock 43 *** drum magazine,” “Glock 43 extended magazines,” “Glock 357,” and “Smith & Wesson SD40 extended clip.” Last, the phone contained a photograph of the Glock 43 9-millimeter handgun recovered in the search. The State entered into evidence a certified copy of the defendant’s prior conviction from 2017.

¶ 13

B. The Defense’s Evidence

¶ 14

The defendant’s brother, Jihad Mahan, testified that he occasionally stayed at O’Leary’s apartment and kept clothes in the main bedroom closet. Other men also stayed there periodically, including their uncle Steven Stewart, O’Leary’s brother, and a man named Frederick. All the men, including the defendant, used the left side of the closet and placed their dirty clothes in a shared hamper. Mahan testified that he had also driven O’Leary’s Chevy Trax. His family had a car rental business where they rented out a fleet of vehicles, including the Chevy Trax. Frederick rented vehicles from them multiple times in 2020. Mahan testified he had seen three handguns and a rifle in O’Leary’s apartment, and in the latter half of 2020, Stewart was in possession of them. Stewart was also involved in the car rental business and oversaw social media marketing through the defendant’s accounts. Stewart died in 2021. Mahan acknowledged he spoke to the defendant and their mother about the case prior to testifying.

¶ 15

Brenda Lewis, the defendant’s mother, testified she had a firearm owner’s identification card and owned a .40-caliber Smith & Wesson handgun and a 9-millimeter handgun. Lewis identified the firearms found in the apartment as those she had seen in Stewart’s possession. She stated that the defendant previously dated O’Leary.

¶ 16 The defendant provided narrative testimony. He testified he was not on O’Leary’s apartment lease, did not receive mail there, and could not control what someone else kept in her home. He stated there were multiple men staying at O’Leary’s apartment, including her brothers, Mahan, and Stewart, among others. The men kept their belongings in the portion of the closet with the weapons. The defendant recognized clothing in the photographs as belonging to Stewart but believed his own hooded sweatshirt was not shown in the photographs. He personally saw Stewart inside and outside of the apartment with the four weapons recovered from the closet. The defendant believed Stewart’s possession of the weapons was lawful. He stated Stewart had a drug problem and had been sentenced to federal prison for guns and drugs. The defendant saw Stewart bring cocaine or white powder into the apartment and use it there.

¶ 17 The defendant stated the aforementioned men and various rideshare handlers had all driven the Chevy Trax. The defendant went back and forth to the apartment because he rented out the vehicle. He explained that his family’s car rental business involved renting cars to individuals who drove for DoorDash and other short-term work. He denied he was the individual depicted in the surveillance videos on November 4 and 6 or that he used cocaine. He testified that he had not engaged in any criminal activity since his 2017 conviction. The blue iPhone recovered from the bed in the main bedroom was not his personal phone and was used for business that multiple people used, including Stewart. The social media accounts were for marketing vehicles.

¶ 18 The defendant testified that he dated O’Leary sporadically in 2020. He had his own apartment and did not stay with her but would visit. While the defendant was present at 5:15 a.m. when the search warrant was executed, he denied he was asleep in the bedroom and stated he was awake in the living room. He also stated his driver’s license was on the sofa in the living room—not in the bedroom closet. When officers searched his person, they recovered a white iPhone,

which he stated was for personal use. He denied that the clothing depicted in photographs belonged to him but believed he had one clothing item in the closet that he could not see in the photographs. He denied having knowledge of the shower caddy that contained loose ammunition and a white powder. While he acknowledged there were photographs of him on the blue iPhone, he stated there should have been photographs of Stewart that must not have been downloaded.

¶ 19 C. Closing Arguments, the Court’s Findings, and Sentencing

¶ 20 As to the counts for reckless discharge of a firearm, the defendant argued no one identified the hooded individual and there was no DNA or fingerprints on the shell casings. As to the UUWF charges, he argued multiple men frequented O’Leary’s apartment and Stewart confessed to ownership of the guns. He argued that the primary DNA profile was not his and his DNA may have transferred to the firearms from contact with his clothing in the closet. The State argued the reckless discharge of a firearm counts were proven because the defendant fired the guns in a densely populated area with hundreds of residents. The defendant was seen driving the Chevy Trax on November 12 and 13 and entering O’Leary’s apartment with a key on November 13. When police arrived with a search warrant, the defendant was in the bedroom with O’Leary and there was a cell phone, guns, drugs, and ammunition mixed in with his belongings. A white hooded sweatshirt and pants like those in the surveillance video were in the closet. The defendant’s DNA was on all four weapons and the discovered shell casings from the parking lot matched the guns in the closet.

¶ 21 The court found the State’s witnesses credible, which were corroborated by physical evidence. The court stated much of the evidence from the defendant and his witnesses was not credible, especially as it related to Stewart, the defendant’s deceased uncle. The court found that the defendant was either living or staying with O’Leary, they shared the main bedroom closet, the

defendant drove the Chevy Trax in the photographs and videos, the individual in the video had a stature and demeanor like the defendant, the individual in the video wore clothing similar to that found in the closet, and the DNA ratios on the firearms was overwhelming. The court found the defendant guilty of two counts of reckless discharge of a firearm and six counts of UUWF. The court acquitted the defendant of unlawful possession of a controlled substance.

¶ 22 Following a sentencing hearing, the court sentenced the defendant to 5 years' imprisonment for the two counts of reckless discharge of a firearm to be served concurrently with 10 years' imprisonment for the six counts of UUWF. The defendant filed a motion to reconsider sentence, which the court denied. The defendant appeals.

¶ 23 II. ANALYSIS

¶ 24 On appeal, the defendant argues (1) the evidence was insufficient to prove his guilt of reckless discharge of a firearm and UUWF and (2) the UUWF statute under which he was convicted is unconstitutional on its face. We address each contention in turn.

¶ 25 A. Sufficiency of the Evidence

¶ 26 When reviewing a challenge to the sufficiency of the evidence, we view the evidence in the light most favorable to the prosecution and determine whether any rational trier of fact could have found the essential elements of the offense beyond a reasonable doubt. *People v. Gray*, 2017 IL 120958, ¶ 35. The trier of fact determines the credibility of the witnesses, assigns weight to the testimony, resolves conflicts in the evidence, and draws reasonable inferences from basic facts to ultimate facts. *People v. Brown*, 2013 IL 114196, ¶ 48. A court of review will not retry the defendant. *People v. Newton*, 2018 IL 122958, ¶ 24. A conviction will not be reversed unless the evidence is so unreasonable, improbable, or unsatisfactory that it creates a reasonable doubt of the defendant's guilt. *People v. Siguenza-Brito*, 235 Ill. 2d 213, 225 (2009).

¶ 27 A person commits reckless discharge of a firearm when he discharges a firearm in a reckless manner which endangers the bodily safety of an individual. 720 ILCS 5/24-1.5(a) (West 2020). Thus, reckless discharge of a firearm has two elements: (1) recklessly discharging a firearm and (2) endangering the bodily safety of an individual. *People v. Cunningham*, 2019 IL App (1st) 160709, ¶ 27. As to UUWF, a person commits this offense when he knowingly possesses a firearm or any firearm ammunition when he has a felony conviction. 720 ILCS 5/24-1.1(a) (West 2020). Here, the defendant argues the evidence failed to support that he was the shooter, the firearm was discharged in a reckless manner that endangered an individual's bodily safety, and that he had possession of the weapons found in O'Leary's closet.

¶ 28 We conclude the evidence was sufficient to support the defendant's guilt as to all counts. First, the evidence supported that the defendant was the shooter and he had constructive possession of the weapons found in O'Leary's closet. The defendant drove and had access to the Chevy Trax. The vehicle was seen in connection to the shootings by eyewitnesses (Valenzuela and Cruz) and the surveillance footage. After the shootings, the police conducted surveillance and observed the defendant drive the vehicle to the apartment complex. A search of the vehicle revealed a Firestone invoice for the vehicle and identified the customer as Johnny Meakens with O'Leary's address. The court took judicial notice that the defendant had "Johnny" tattooed on his neck under his right ear. The social media accounts found on the blue iPhone also had links to the names Lamar and Johnny. The defendant also testified he had access to the vehicle. Further, the defendant either lived or stayed with O'Leary at her apartment during this time period. The police observed the defendant enter the apartment with a key. A search of the apartment demonstrated men's clothing was kept on one side of the closet, and the defendant stated that he had clothing in the closet. The defendant's mother confirmed that the defendant and O'Leary were in a relationship. When the

police executed a search warrant in the early morning hours, the defendant and O’Leary were both present in the apartment. The property manager of the apartment complex told the police that O’Leary lived in the apartment and her boyfriend had been staying with her.

¶ 29 The search warrant revealed four firearms in the shared closet, which included the Glock 43 9-millimeter handgun and a Smith & Wesson .357-caliber revolver that were located on a shelf under a white hooded sweatshirt. The shooter depicted in parking lot surveillance footage exited the Chevy Trax while wearing a light-colored hooded sweatshirt with the hood up. In the same area of the closet, the police found a windbreaker that contained the defendant’s identification. A shower caddy on the shelf contained Glock magazines and several rounds of loose ammunition. The firearms underwent a DNA analysis where the defendant’s DNA was found on them with strong confidence. Further, the seven shell casings found in the parking lot after the November 4 shooting were fired from the Smith & Wesson .40-caliber handgun and the seven shell casings found in the parking lot after the November 6 shooting were fired from the Glock. The blue iPhone with the ownership listed as “Johnny’s iPhone” was linked to the defendant’s social media accounts, contained voicemails for “Lamar Meakens,” and had a browser history related to the firearms found in the closet and used in the shootings. Further, the phone number associated with the device was the same number the defendant provided in his court filings. Thus, the evidence demonstrated that the defendant was the individual who fired rounds on November 4 and 6 and he had possession of the weapons in O’Leary’s closet.

¶ 30 We reiterate that the trier of fact, the court in this case, was tasked with determining the credibility of the witnesses, assigning weight to the testimony, resolving conflicts in the evidence, and drawing reasonable inferences from basic facts to ultimate facts. See *Brown*, 2013 IL 114196, ¶ 48. The court explained that it did not find the defendant’s witnesses to be credible and the

individual in the video had a stature and demeanor like the defendant. The court was in the best position to observe the defendant. Based on the record before us, the court’s findings are not unreasonable. While the defendant takes issue with the adequacy of the circumstantial evidence, we note “[t]he trier of fact need not *** be satisfied beyond a reasonable doubt as to each link in the chain of circumstances” and “[i]t is sufficient if all of the evidence taken together satisfies the trier of fact beyond a reasonable doubt of the defendant’s guilt.” *People v. Hall*, 194 Ill. 2d 305, 330 (2000). Such is the case here.

¶ 31 Second, the evidence showed the defendant discharged a firearm in a reckless manner which endangered an individual’s bodily safety. The discharge of a firearm is reckless when it “creates a substantial and unjustifiable risk to others.” *People v. Giraud*, 2012 IL 113116, ¶ 21. Endangerment is shown where the defendant’s reckless conduct created a dangerous situation but does not require actual harm. *People v. Collins*, 214 Ill. 2d 206, 215 (2005). Thus, this requirement “does not refer to conduct that will result or actually results in harm, but rather to conduct that could or might result in harm.” *Id.* Here, the defendant argues there was no evidence presented to demonstrate that an individual was in the vicinity of the discharge. See *id.* at 218. As to Valenzuela and her family, the defendant argues the apartment complexes were behind the shooter at the time the shots were fired, therefore, they were not in the vicinity of the discharge.

¶ 32 The evidence showed the defendant fired several rounds in the direction of Community Park, which was a large park with playgrounds, basketball courts, and open fields and was surrounded by apartment complexes. Testimony demonstrated the area was densely populated, and a shot fired from a firearm at the edge of the park could travel up to a mile and strike someone on the other side of the park or parking lot. Valenzuela testified that her children were scared the night of the November 4 shooting and ran into her bedroom. As to the November 6 shooting, it woke

Valenzuela and she moved to the floor to look out the window. She thought the shootings were next to her bed as they were “very close.” It is evident the defendant fired these firearms directly at Community Park and in close proximity to the occupied apartments. See *id.* (considering the shooting occurred in a residential area where “at least four homes in proximity to the location of the shooting”). There is no requirement that a shot be fired *directly* at an individual—only that an individual was in the vicinity. Therefore, a reasonable trier of fact could find that the individuals in these areas were placed in danger of the gunshots.

¶ 33 In reaching this conclusion, we reject the cases the defendant relies on for this argument as they are factually inapposite. *People v. Grant*, 2017 IL App (1st) 142956, ¶ 29, involved the discharge of a firearm inside an apartment where the defendant was the only individual present in the apartment and no evidence was presented as to whether other houses or apartment buildings were located near or in the vicinity of the defendant’s apartment. The court noted there was no evidence presented like there was in *Collins* where the court noted “at least four other homes were in proximity to the shooting in that case.” *Id.* Here, we have clear evidence that there were apartment complexes and a park in the vicinity of the discharge. Moreover, in *People v. Moreno*, 2015 IL App (3d) 130119, ¶ 44, the defendant fired rounds directly into the ground of a residential area where individuals were behind him. The court noted the chance of any of the individuals being hit by a potential ricochet was virtually zero. *Id.* The defendant relies on this case because Valenzuela’s apartment was in the opposite direction of the shooting. However, the *Moreno* court went on to distinguish shooting at the ground versus into the air and noted that “shots fired into the air pose a much more substantial risk of harm.” *Id.* ¶ 47 While the gunshots fired in this case were not fired into the air above, they were not fired into the ground either.

¶ 34 For these reasons, we cannot say the evidence is unreasonable, improbable, or unsatisfactory that it creates a reasonable doubt of the defendant’s guilt as to each conviction. Accordingly, we conclude the evidence was sufficient to sustain the defendant’s convictions.

¶ 35 B. UUWF Statute Facial Challenge

¶ 36 Last, the defendant argues that the UUWF statute is facially unconstitutional under both the United States and Illinois Constitutions. Specifically, he challenges the lifetime prohibition of possessing a firearm for felons. All statutes are presumed constitutional and we must uphold their constitutionality whenever reasonably possible. *People v. Wells*, 2023 IL App (3d) 210292, ¶ 19. A facial challenge to a statute can only overcome this presumption by showing that the statute is unconstitutional under any set of circumstances. *People v. Hilliard*, 2023 IL 128186, ¶ 21. We review *de novo* the constitutionality of a statute. *Wells*, 2023 IL App (3d) 210292, ¶ 19.

¶ 37 In *New York State Rifle & Pistol Ass’n, Inc. v. Bruen*, 597 U.S. 1, 26-27 (2022), the United States Supreme Court set forth a two-pronged analysis for evaluating the constitutionality of statutory firearm regulations.¹ First, we must determine whether the conduct at issue is protected under the plain text of the second amendment. *Id.* at 24. If so, we then consider whether the regulation justifiably comports with history and tradition. *Id.*; *People v. Travis*, 2024 IL App (3d) 230113, ¶ 24.

¶ 38 Applying this framework, we upheld the facial constitutionality of the UUWF statute in *Travis*, 2024 IL App (3d) 230113, ¶ 33. We resolved *Bruen*’s first step by concluding that disarming felons falls within the plain text of the second amendment. *Id.* ¶ 25. The amendment’s plain language guaranteeing the “right of the people to keep and bear Arms” covers the possession

¹The Court emphasized regulations prohibiting felons from possessing firearms remain presumptively lawful post-*Bruen*. *United States v. Rahimi*, 602 U.S. 680, 699 (2024).

of firearms and does not exclude felons from “the people” to whom it applies. U.S. Const., amend. II; *Travis*, 2024 IL App (3d) 230113, ¶ 25. Considering *Bruen*’s second prong, our historical analysis in *Travis* demonstrated that the UUWF statute is consistent with this country’s history and tradition of disarming individuals that violate the law or are deemed dangerous. *Travis*, 2024 IL App (3d) 230113, ¶¶ 27-33. The twentieth century laws prohibiting felons from possessing firearms evolved from comparable status-based restrictions dating back to the founding era. *Id.* ¶¶ 28-31. *Bruen*’s historical inquiry only requires that the challenged regulation have “a well-established and representative historical *analogue*, not a historical *twin*.” (Emphases in original.) *Bruen*, 597 U.S. at 30. Analogous modern and historical regulations are determined by their relative similarities, which include, *inter alia*, “ ‘how and why the regulations burden a law-abiding citizen’s right to armed self-defense.’ ” *Travis*, 2024 IL App (3d) 230113, ¶ 24 (quoting *Bruen*, 597 U.S. at 29). The disarmament of felons based on their criminal convictions is consistent with a longstanding history and tradition of similar firearm prohibitions disarming individuals that engaged in criminal conduct or posed a danger to society. *Id.* ¶¶ 29-31. Like its historical antecedents, the UUWF statute imposes practically no burden on the second amendment rights of law-abiding citizens. *Id.* ¶ 33.

¶ 39 While the defendant contends these historical predecessors cannot provide a proper analogue for the permanent disarmament of felons, the UUWF statute does not provide an indissoluble ban. A felon can be exempt from its provisions by successfully obtaining relief under section 10 of the Firearm Owners Identification Card Act (430 ILCS 65/10 (West 2020)). See 720 ILCS 5/24-1.1(a) (West 2020). Therefore, the statute is facially constitutional under the United States Constitution.

¶ 40 Last, we address whether the UUWF statute is facially invalid under article I, section 22 of the Illinois Constitution. As discussed in *Travis*, we reject the defendant’s claim that by extending the right to bear arms to “the individual citizen” the Illinois Constitution provides greater protection than the right granted to “the people” under the second amendment. *Travis*, 2024 IL App (3d) 230113, ¶ 42. While the use of the phrase “individual citizen” broadens the scope of the type of arms covered by expanding it beyond weapons only traditionally used by a regulated militia (*id.* ¶ 40), article I, section 22, also provides the state with an immense degree of control over firearms by explicitly limiting the right to bear arms subject to the police power. Ill. Const. 1970, art. I, § 22. The disarmament of felons under the UUWF statute is a proper exercise of this power, which contemplates legislation intended to prohibit or restrict anything that presents a danger to the welfare of the people. *Travis*, 2024 IL App (3d) 230113, ¶¶ 41, 43.

¶ 41 Accordingly, we adopt *Travis* here and find that the UUWF statute is facially constitutional under both the United States and Illinois Constitutions.

¶ 42 III. CONCLUSION

¶ 43 The judgment of the circuit court of Du Page County is affirmed.

¶ 44 Affirmed.