



(Docket No. 130779)

THE PEOPLE OF THE STATE OF ILLINOIS, Appellee, v.
ISAIAH J. WILLIAMS, Appellant.
Opinion filed November 20, 2025.

Justice Cunningham delivered the judgment of the court, with opinion.

Defendant appealed his conviction for threatening a public official for statements he made while being arrested by a Kendall County sheriff's deputy. Defendant's jury was given Illinois criminal pattern jury instructions (IPI) 11.49 and 11.50 to define the offense. IPI 11.49 does not mention that the law enforcement officer must receive a "unique threat" and not a generalized threat of harm, while IPI 11.50 does mention that requirement. Thus, defendant contended, the two instructions conflicted and misled the jury as to the elements the State had to prove. The appellate court affirmed his conviction, and the supreme court agreed.

Nothing in IPI 11.49 contradicted or negated the propositions required to be proved in IPI 11.50. Jurors were told not to single out or disregard any instructions, and so no reasonable juror could have followed only IPI 11.49 and not IPI 11.50. IPI 11.49 gave a general definition of the offense of threatening a public official, and IPI 11.50 told the jury what specific propositions, including the unique threat to the officer, had to be found.