



(Docket No. 130585)

THE PEOPLE OF THE STATE OF ILLINOIS, Appellant, v.
ANZANO P. CHAMBLISS, Appellee.
Opinion filed January 23, 2026.

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

The trial court in this case failed to conduct a preliminary hearing to establish probable cause, and the supreme court addressed the question of whether this constituted reversible error. Defendant was charged by information with aggravated battery after an altercation with two women outside a convenience store. Defendant's arraignment and preliminary hearing were delayed for a pending fitness evaluation, without objection from defense counsel. Defendant did not cooperate with the fitness evaluation over the course of months. Upon being found fit, defendant elected to represent himself and sought trial a month later, noting that he was never arraigned. There was no discussion of the lack of a preliminary hearing to determine probable cause. Defendant represented himself at trial and was convicted.

The appellate court reversed, finding the lack of a preliminary hearing to determine probable cause to be plain error (not barred by defendant's failure to raise it below) and second-prong, structural error that rendered the criminal trial itself unfair. On review, the supreme court first rejected the State's arguments (1) that defendant's waiver of his statutory right to a preliminary hearing also waived his constitutional right to such a hearing and (2) that defendant invited the error by demanding a trial immediately upon being found fit. The Illinois Constitution places responsibility for providing a defendant with a preliminary hearing upon the trial court. While the defendant was denied his constitutional right to a preliminary hearing, the supreme court determined it did not arise to a structural error; it did not undermine the fairness of the trial or challenge the integrity of the judicial process.