2026 IL App (1st) 241656-U

No. 1-24-1656

Order filed August 27, 2026

Fourth Division

**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).

IN THE

APPELLATE COURT OF ILLINOIS

FIRST DISTRICT

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| THE PEOPLE OF THE STATE OF ILLINOIS, | ) | Appeal from the |
| | ) | Circuit Court of |
| Plaintiff-Appellee, | ) | Cook County. |
| | ) | |
| v. | ) | No. 22 CR 06348 |
| | ) | |
| RAHSAAN DILLARD, | ) | Honorable |
| | ) | Michael R. Clancy, |
| Defendant-Appellant. | ) | Judge, presiding. |

PRESIDING JUSTICE NAVARRO delivered the judgment of the court.
Justices Ocasio and Quish concurred in the judgment.

**ORDER**

¶ 1 *Held*: We affirm defendant's convictions for robbery and domestic battery where (1) the trial court did not abuse its discretion in admitting evidence of defendant's prior acts of domestic violence, (2) defendant's counsel did not provide ineffective assistance, and (3) defendant's time on GPS monitoring did not constitute custody or home detention eligible for sentencing credit.

¶ 2 Following a bench trial, defendant Rahsaan Dillard was convicted of robbery and domestic battery and sentenced to concurrent terms of 3 years in prison and 180 days in the Cook County Department of Corrections, respectively. On appeal, he contends that the trial court erred in

admitting other-crimes evidence and that his counsel rendered ineffective assistance by failing to have such evidence excluded. Defendant also argues that he is owed more sentencing credit for his time on GPS monitoring. We affirm.

¶ 3 Following an incident on March 22, 2022, between defendant and Malissa W. (Malissa), defendant was charged with robbing Malissa of her cellphone and keys (720 ILCS 5/18-1(a) (West 2022)), theft of the cellphone and keys (*id.* § 16-1(a)(1)), and domestic battery for striking Malissa "with closed fists and kicks" (*id.* § 12-3.2(a)(1)). After defendant's arrest, he was released on cash bond.

¶ 4 On August 25, 2023, the State filed a pretrial motion to admit proof of defendant's uncharged acts of domestic violence pursuant to section 115-7.4 of the Code of Criminal Procedure of 1963 (Code of Criminal Procedure) (725 ILCS 5/115-7.4 (West 2022)). The State described the charged offense, and six prior incidents occurring on April 24, 2021; February 26 and 27, 2022; and March 2 and 3, 2022. The State argued that the prior incidents occurred within a year of the charged offense and similarly involved defendant damaging property, threatening Malissa, and calling her a "b***."

¶ 5 At the hearing on the motion, defense counsel argued that section 115-7.4 did not allow admission of "made up" allegations. Counsel asserted that defendant had filed a complaint against Malissa with the Chicago Police Department alleging that she had stolen approximately $30,000 from him. According to counsel, Malissa "began filing the alleged cases" after defendant asked her to return the funds.

¶ 6 On September 25, 2023, the trial court ruled that evidence of the prior incidents was admissible "to show intent, lack of mistake, motive, or propensity." The court considered the prior

incidents' proximity to the charged offense, observing that all but one incident occurred within one month of the charged offense, and the least proximate incident happened within a year of the charged offense. The court additionally considered the "degree of factual similarity" between the prior incidents and the charged offense, noting they "involve[d] threats," "damaging property," and "stealing property," and that the three incidents allegedly occurred at Malissa's residence. Further, defendant had allegedly called Malissa a "b***" in the charged offense and in two prior incidents. The court explained that it had "weighed the probative value of the evidence against the prejudicial effect" on defendant and found that the former outweighed the latter.

¶ 7 At a pretrial status conference on February 6, 2024, the trial court stated that "a prior [j]udge" had placed defendant on GPS monitoring to distance him from Malissa and her family. The court entered an order continuing defendant's GPS monitoring.

¶ 8 Before trial commenced on June 6, 2024, the trial court and the parties discussed defendant's accrued sentencing credit under the Unified Code of Corrections (Code of Corrections) (730 ILCS 5/5-4.5-100(b) (West 2022)). Per the discussion, defendant's GPS monitoring excluded him from certain zones, including his regular commute on the Eisenhower Expressway. He also wore his GPS-monitoring device while hospitalized. The court stated that defendant would not receive sentencing credit for time spent on GPS monitoring because he was not "in his house *** in a detention situation." The court also noted that the GPS monitoring was not subject to curfew and that defendant's hospitalization was unrelated to time in custody.

¶ 9 The trial court also held a conference pursuant to Illinois Supreme Court Rule 402 (eff. July 1, 2012) and admonished defendant that it would hear what the State believed the facts would show and any prior criminal history. The court advised defendant that he could not "ask for a new

Judge just because [it] heard the information" that may be presented at trial or sentencing. During the conference, the State detailed defendant's prior acts of domestic violence. After the conference, the court set the case for trial.

¶ 10 We set forth only the evidence relevant to the issues raised on appeal.

¶ 11 At trial, Douglas Yang testified that he lived in a unit below Malissa's residence in an apartment building that Yang owned. During the night of April 23 into April 24, 2021, Malissa's back door alarm activated, waking Yang. Sensors triggered the alarm if the door opened, so Yang surmised that someone was knocking on Malissa's door hard enough to activate the sensors. When the alarm kept ringing, Yang went outside and encountered a man wearing orange clothing. The man left without identifying himself but returned once or twice later that night.

¶ 12 Around 2 p.m. on April 24, 2021, Yang heard a "thud" outside his open front window. Yang went outside and observed Malissa's Mercedes-Benz with a shattered rear window and damaged driver's side window. He found a large rock inside the vehicle. The State published a photograph of Malissa's damaged Mercedes-Benz, which is included in the record on appeal and depicts a hole smashed in the vehicle's rear window.

¶ 13 Afterwards, while Yang spoke to police outside the building, he saw a black SUV driven by a black man with a "slightly larger build" and wearing an orange outfit. The vehicle slowed in front of the building before speeding away. Yang recognized the driver as the man who had knocked on Malissa's back door.

¶ 14 On cross-examination, Yang testified that the man knocking on Malissa's door stated that she had asked him to come to her apartment. Yang did not see anyone throw the rock through the vehicle's window.

¶ 15 On redirect examination, Yang identified defendant in court as the man who knocked on Malissa's door. Yang could not "say for sure" that defendant drove the black SUV, but "his build and the item he was wearing matche[d] the description in [his] mind."

¶ 16 Winnie Liu, Yang's wife, testified that, after hearing a "thud" outside the apartment on April 24, 2021, she went to the front window and saw a man throwing an object at Malissa's vehicle. It took several attempts for the man to break the vehicle's rear window. He left, but a few minutes later, he drove by and threw something at the driver's side window of Malissa's vehicle. The man was black, had a "bigger build," and wore a bright orange jumpsuit. Liu had seen that same man wearing an orange jumpsuit "banging" on Malissa's door the night before. Defendant's build was "similar" to that man's build, but she did not see the man's face closely enough to identify defendant in court as that man.

¶ 17 Malissa testified that she had known defendant since grammar school, and they dated periodically from 2016 to 2021 or 2022.

¶ 18 On the evening of February 26, 2022, Malissa was at a club with a male friend when defendant approached and ordered a drink, telling the bartender that Malissa would pay for it. She refused, but her friend paid for the drink. Defendant made Malissa uncomfortable by staring at her. After they finished their drinks, Malissa's friend escorted Malissa to her vehicle. Defendant followed, calling her a "b***." She told him to leave her alone, but, after she sat in the driver's seat, he "jumped" in the passenger's seat. Defendant grabbed Malissa's purse from her arm, and they struggled over the purse before he "snatch[ed]" it and fled.

¶ 19 Defendant agreed to meet Malissa on February 27, 2022, to return the purse. Around 2 p.m., Malissa parked in front of defendant's residence and lowered her window. Defendant

approached, "swung" into the vehicle, and grabbed Malissa's house keys and cellphone before running into his home. Malissa sought an order of protection, which was granted on March 1, 2022.

¶ 20 At 2 or 3 a.m. on March 3, 2022, a crashing sound from Malissa's living room woke her. The front window had been shattered, a table was broken, and a brick was on the floor. Malissa opened her door and found defendant outside, laughing, calling her a "b***," and saying he would kill her. He said her parents' home "was next" and left in his black Dodge Durango.

¶ 21 The night of March 3, 2022, Malissa drove a rental vehicle because defendant had "tor[n] up" her Mercedes-Benz. At 11:30 p.m., Malissa and her daughter Rickelle W. (Rickelle) were in the rental vehicle when defendant "pulled up" in his Dodge. Defendant said, "B***, let me talk to you" and asked her to stop her vehicle. When Malissa did not stop, he threw water bottles at her vehicle. Malissa drove to a police station. Later, when she exited the station accompanied by police officers, defendant was circling the block, calling Malissa a "b***," threatening to kill her, and saying she "better talk to him." Malissa, who was "extremely afraid," drove to the home of her other daughter, Rickay W. (Rickay), followed by the police. Defendant drove by the home in his Dodge and the police pursued him.

¶ 22 The State then directed Malissa's attention to March 22, 2022, asking if she arrived home that evening or early morning. Malissa responded, "I'm trying to remember that day." The State inquired what she saw upon her arrival, and Malissa said that, if she was "thinking correctly," her daughter and granddaughter were "crying." Malissa was "trying to remember," and there had been "so many incidents." The State then asked whether an incident had occurred involving defendant later in March, and Malissa responded, "Oh, yes."

¶ 23 At approximately 12:15 a.m. on March 22, 2022, Malissa entered her apartment building's gate, cellphone and keys in hand, and inserted her key into the screen door's lock. Then, defendant "jumped out" from behind, grabbed her, and knocked her to the ground, injuring her knee. He punched her and bit her face. Defendant pried Malissa's keys and phone out of her hands. During this, he called her a "b***" and threatened to kill her. He then fled in his black Dodge. Afterwards, Malissa had bruises on her face, leg, and hand, pictures of which the State published and are included in the record on appeal. Malissa later required knee surgery.

¶ 24 Rickelle testified that she was with Malissa at approximately 11:30 p.m. on March 3, 2022. Defendant, whom Rickelle identified in court, approached them in a black Dodge SUV, threw water bottles at them, called Malissa a "b***," and said, "she was gonna die." While Malissa and Rickelle drove to a police station, defendant followed them. He texted and called Rickelle many times, threatening them and their family. Eventually, Malissa and Rickelle drove to Rickay's residence, where, upon their arrival, defendant sped past in his black SUV.

¶ 25 The parties stipulated that Chicago police officer Stuart Griffith would testify that he escorted Malissa and Rickelle to Rickay's home on March 3, 2022. There, Griffith observed a black SUV drive past the house. Griffith and his partner pursued the SUV for a time, and Griffith would be unable to identify the SUV's driver.

¶ 26 Defendant testified that he had given Malissa $100,000 to hold for him at the beginning of their relationship. When she did not return the money, he filed a police report on February 26, 2022. He denied stealing anything from Malissa. On cross-examination, defendant denied owning a vehicle and said he gave the police report that he filed to his attorney.

¶ 27 Felton Russell testified that he was at defendant's residence in February 2022, and saw defendant, with cash, enter defendant's bedroom where Malissa later joined him.

¶ 28 After closing arguments, the trial court found defendant guilty of robbery; theft, which the court said would merge into robbery; and domestic battery.

¶ 29 Defendant filed a motion for a new trial, arguing that the trial court erred when admitting evidence of the prior acts of domestic violence. The court denied the motion, noting that the charged offense was the court's "main focus" and it gave "appropriate weight to the other crimes evidence that was appropriately admitted."

¶ 30 After a hearing on August 6, 2024, the trial court sentenced defendant to concurrent terms of 3 years in prison for robbery and 180 days in the Cook County Department of Corrections for domestic battery. During the hearing, the court inquired how much sentencing credit defendant had accrued. Defense counsel said two days, but also that defendant should receive credit for another 835 days because he was on GPS monitoring for 24 hours a day. The State countered that defendant was not on electronic home monitoring and had "been free to go wherever he want[ed] whenever he want[ed] subject to the conditions of GPS." After confirming that defendant's GPS monitoring did not "limit his ability to leave his house at any time or travel as he wished other than going in that one zone of exclusion," the court stated that defendant was not entitled to credit for his time on GPS monitoring and would receive only two days of credit for "time actually served."

¶ 31 Defendant did not file a postsentencing motion.

¶ 32 On appeal, defendant first argues that the trial court erred by admitting extensive other-crimes evidence too dissimilar from the charged offenses, and that defense counsel rendered ineffective assistance by failing to prevent the admission of such evidence.

¶ 33 Evidence of a defendant's other crimes is generally inadmissible to demonstrate his propensity to commit charged crimes. *People v. Rainey*, 2025 IL App (1st) 230639, ¶ 55. However, other-crimes evidence is admissible to show propensity under specific statutory exceptions, including section 115-7.4 of the Code of Criminal Procedure. *People v. Smart*, 2025 IL 130127, ¶ 72. This provision permits propensity evidence of prior acts of domestic violence allegedly perpetrated by a defendant charged with a crime involving domestic violence. *People v. Heintz*, 2026 IL 131340, ¶ 38. Before such evidence can be admitted, the State must show that the prior act of domestic violence occurred and that the defendant participated in it. See *People v. Thingvold*, 145 Ill. 2d 441, 455 (1991). The State is not required to prove that the defendant participated in the other crimes beyond a reasonable doubt, but must offer proof amounting to "more than a mere suspicion." *Id.* at 456.

¶ 34 Evidence of other domestic violence crimes must be relevant, and a court must weigh the evidence's probative value against the risk of undue prejudice to the defendant. 725 ILCS 5/115-7.4(a)-(b) (West 2022). When doing so, a court must consider (1) the proximity in time between the alleged domestic violence incidents, (2) their factual similarity, and (3) "other relevant facts and circumstances." *Id.* § 115-7.4(b). Other-crimes evidence, once admitted, should not become a "focal point" of the proceedings such that a "mini-trial" of the other crimes occurs. See *People v. Bedoya*, 325 Ill. App. 3d 926, 938 (2001). A court should therefore limit the admission of other-crimes evidence to "that which is necessary to illuminate the issue for which the other crime was introduced." (Internal quotation marks omitted.) *Id.* We review a trial court's admission of evidence for abuse of discretion, which "occurs when [its] decision is arbitrary, fanciful, or

unreasonable, or where no reasonable person would take" the trial court's position. (Internal quotation marks omitted.) *Rainey*, 2025 IL App (1st) 230639, ¶ 53.

¶ 35 As noted, defendant argues that the prior acts admitted at trial were too factually dissimilar to the charged offenses.

¶ 36 First, defendant highlights that neither Yang nor Liu confirmed that he perpetrated the April 24, 2021, incident involving the object thrown at Malissa's vehicle.

¶ 37 Second, defendant asserts that all the prior incidents differed from the charged offense in location, time of day, people involved, number of witnesses, *modus operandi*, and level of violence. For instance, the April 24, 2021, incident occurred in the daytime almost a year before the charged offense, and Malissa was not present. The April 24, 2021, and March 3, 2022, incidents did not involve theft, and three incidents took place away from Malissa's residence. According to defendant, none of the prior incidents included "serious allegations of physical harm."

¶ 38 Third, defendant contends that, even if the prior incidents were sufficiently similar and proximate, the "voluminous" other-crimes evidence—discussed at the pretrial hearing, the Rule 402 conference, and presented through five witnesses at trial—became a "focal point" and led to a "mini-trial" of the prior incidents, particularly where only one witness, Malissa, testified to the charged offense. He maintains that even Malissa was confused, highlighting her statement that there were "so many incidents" and her initial difficulty recalling the charged offense.

¶ 39 We find that the trial court did not abuse its discretion in admitting evidence of the other incidents of domestic violence.

¶ 40 As to the April 24, 2021, incident, Yang and Liu sufficiently substantiated defendant's involvement. Yang recognized the man with a "slightly larger build" who drove by in a black SUV

wearing an orange outfit as the man who knocked on Malissa's back door; in court, Yang identified that man as defendant. Liu witnessed a "bigger build" black man wearing an orange jumpsuit throw objects at Malissa's vehicle and had seen that man "banging" on Malissa's door. Yang and Liu's testimonies supported "more than a mere suspicion" that defendant was involved in the April 24, 2021, incident. See *People v. Valdez*, 2022 IL App (1st) 181463, ¶ 64 (although the State did not "link defendant" to a prior domestic-violence incident "through an eyewitness or defendant's own admission, the available evidence still add[ed] up to 'more than a mere suspicion' that defendant" caused the incident).

¶ 41 Second, the prior incidents were sufficiently proximate and similar. The trial court correctly noted that all but one incident occurred within one month of the charged offense, and the remaining incident, April 24, 2021, occurred within one year of the charged March 22, 2022, offense. Reviewing courts have held less proximate incidents admissible. See *People v. Donoho*, 204 Ill. 2d 159, 183-84 (2003) (collecting cases in which courts properly admitted evidence of other crimes that predated the charged conduct by 13 to 20 years).

¶ 42 The February 26 and March 3, 2022, incidents occurred at night, like the charged offense. As the trial court also observed, all the prior incidents "involve[d] threats[,] *** damaging property, stealing property," and three occurred at Malissa's residence. The February 26 incident, which occurred away from Malissa's home, involved a physical struggle between Malissa and defendant. Both February incidents ended similarly to the charged offense with defendant seizing Malissa's belongings from her person. The court explicitly weighed section 115-7.4's enumerated considerations, and we cannot say no reasonable person would agree with the court's conclusion that the prior incidents were sufficiently proximate and similar for admission.

¶ 43 Third, the trial court did not abuse its discretion by permitting the quantity of other-crimes evidence presented. Cases holding that the volume of other-crimes evidence resulted in undue prejudice are "extreme." *People v. House*, 2023 IL App (1st) 220496-U, ¶ 34; see Ill. S. Ct. R. 23(e)(1) (eff. June 3, 2025) (nonprecedential orders entered under Illinois Supreme Court Rule 23(b), on or after January 1, 2021, may be cited as persuasive authority). For instance, the other-crimes evidence found excessive in *People v. Cardamone*, 381 Ill. App. 3d 462, 491 (2008), outnumbered the charged 26 acts by hundreds and involved numerous victims. Weighing the evidence's probative value against the risk of undue prejudice requires more than "simply comparing the volume of other-crimes evidence to the number of charged offenses." *House*, 2023 IL App (1st) 220496-U, ¶ 34.

¶ 44 Unlike *Cardamone*, this case is comparatively a "relatively simple case with few witnesses." See *id.* ¶¶ 33, 36 (rejecting the defendant's contention that presenting "more than twice as much other-crimes evidence" compared to the evidence offered on charged offenses was "excessive" and denied him a fair trial where the defendant's case was "relatively simple" and had "few witnesses"). Here, admission of the prior incidents was not excessive. The evidence provided context for defendant and Malissa's relationship and the escalation of defendant's conduct leading to the charged March 22, 2022, incident. Contrary to defendant's contention, the proceedings below did not devolve into a mini-trial of the prior domestic-violence incidents, as evidenced by the trial court's statement that its "main focus" was the March 22, 2022, incident and that it gave "appropriate weight to the other[-]crimes evidence appropriately admitted."

¶ 45 We additionally note that the amount of statutorily-permitted other-crimes domestic violence evidence here was not excessive given the "significantly" reduced risk for undue

prejudice it posed in a bench trial, where a judge is the trier of fact instead of a jury. *People v. Felton*, 2019 IL App (3d) 150595, ¶ 47. We presume that the admission of substantial quantities of other-crimes evidence "is not likely to mislead or confuse a trial judge." *Id.* ¶ 48. In sum, the court did not err when admitting evidence of defendant's other acts of domestic violence.

¶ 46 Defendant next contends that his counsel rendered ineffective assistance by failing to argue at the pretrial hearing that the other-crimes evidence would be overly prejudicial.

¶ 47 The United States Constitution guarantees a defendant's right to effective assistance of counsel. U.S. Const., amends. VI, XIV. To establish ineffective assistance of counsel, a defendant must show that "(1) his counsel's conduct fell below an objective standard of reasonableness, and (2) prejudice from the unreasonable conduct." *People v. Hill*, 2025 IL App (1st) 230604, ¶ 55. When no error occurred, "it necessarily follows" that counsel's "performance cannot be considered deficient" and defendant could not "have suffered any prejudice by counsel's actions." *People v. Redmond*, 2025 IL App (1st) 231795, ¶ 63.

¶ 48 As explained, the trial court did not abuse its discretion in admitting the prior incidents of domestic violence. Therefore, counsel's failure to have the other-crimes evidence excluded "cannot be considered deficient." *Id.* Accordingly, defendant's ineffective assistance claim fails. *Id.*

¶ 49 Defendant finally contends that the trial court erred in ordering only two days of sentencing credit.

¶ 50 As a threshold matter, the State argues that this court lacks jurisdiction to review this issue. According to the State's brief, defendant filed a motion to correct the mittimus on March 18, 2025, which the trial court denied on March 26, 2025. The motion to correct the mittimus and the

responding order are not in the record on appeal. The State asserts that defendant should have appealed the trial court's denial of his motion to correct the mittimus to make his challenge justiciable under Illinois Supreme Court Rule 472 (eff. Feb. 1, 2024).

¶ 51 Rule 472(c) provides that "[n]o appeal may be taken by a party from a judgment of conviction on the ground of any" error in calculating sentencing credit "unless such alleged error has first been raised in the circuit court." Ill. S. Ct. R. 472(c) (eff. Feb. 1, 2024). Rule 472(e) provides that "[i]n all criminal cases *** in which a party has attempted to raise sentencing errors covered by this rule for the first time on appeal, the reviewing court shall remand to the circuit court to allow the party to file a motion pursuant to this rule." Ill. S. Ct. R. 472(e) (eff. Feb. 1, 2024). We review *de novo* the question of our jurisdiction (*People v. Seymore*, 2025 IL 131564, ¶ 18) and the interpretation of supreme court rules (*People v. Gawlak*, 2019 IL 123182, ¶ 25).

¶ 52 As noted, the record on appeal does not include defendant's motion to correct the mittimus or the trial court's order denying it. "A party may generally not rely on matters outside the record to support its position on appeal." (Internal quotation marks omitted.) *Waukegan Hospitality Group, LLC v. Stretch's Sports Bar & Grill Corp.*, 2024 IL 129277, ¶ 20.

¶ 53 That said, defendant's motion to correct the mittimus would not impact our jurisdiction. Rule 472 only requires that the alleged sentencing error be raised in the first instance in the trial court. *People v. Monroe*, 2025 IL App (1st) 240471-U, ¶ 11; see Ill. S. Ct. R. 23(e)(1) (eff. June 3, 2025) (nonprecedential orders entered under Illinois Supreme Court Rule 23(b), on or after January 1, 2021, may be cited as persuasive authority). Since defendant challenged his credit at sentencing, it is justiciable before this court. *Id.*

¶ 54 The Code of Corrections provides that a defendant shall receive credit for time spent in custody before sentencing and in "home detention." 730 ILCS 5/5-4.5-100(b) (West 2022). The Electronic Monitoring and Home Detention Law (Home Detention Law) (*id.* § 5-8A-1 *et seq.*) defines "home detention" as "the confinement of a person convicted or charged with an offense to his *** residence under the terms and conditions established by the supervising authority." *Id.* § 5-8A-2(C). A person subject to electronic monitoring for home detention (1) may be required to maintain a monitoring device on his person, (2) shall not commit another crime, and (3) shall abide by other conditions set by the supervising authority. *Id.* § 5-8A-4(E)(2)-(3), (G), (I). Section 5-4.5-100(b) of the Code of Corrections additionally includes as home detention "restrictions on liberty such as curfews restricting movement for 12 hours or more per day and electronic monitoring that restricts travel or movement." *Id.* § 5-4.5-100(b).

¶ 55 We review a defendant's sentencing credit *de novo*. *People v. Donahue*, 2022 IL App (5th) 200274, ¶ 10.

¶ 56 Defendant argues that he should receive sentencing credit for his 865 days on GPS monitoring, for a total of 867 days of credit. He asserts that the monitoring constituted home detention because it excluded him from accessing the Eisenhower Expressway, and he satisfied the program's conditions by wearing the monitoring device, even when hospitalized, and by not committing any crimes.

¶ 57 However, a defendant released on bond is not in custody for sentencing credit purposes under section 5-4.5-100(b).

¶ 58 Furthermore, under the Home Detention Law's plain language, defendant's supervision through GPS monitoring does not qualify as home detention. Specifically, he was not "confined"

to his home—he could leave his residence at any time and go anywhere, except the expressway or locations covered by the orders of protection. See *Donahue*, 2022 IL App (5th) 200274, ¶¶ 24-26 (the defendant was not under home detention or in custody where his bond conditions restricted him to his residence and workplace). Therefore, the court did not err when declining to provide defendant with additional sentencing credit.

¶ 59 For the foregoing reasons, we affirm the judgment of the circuit court of Cook County.

¶ 60 Affirmed.