



(Docket No. 132403)

THE PEOPLE OF THE STATE OF ILLINOIS, Appellee, v.

JESSE POST, Appellant.

*Opinion filed October 29, 2026.*

Justice Holder White delivered the judgment of the court, with opinion.

This case concerns what a criminal defendant, initially held in custody pending trial, must show in seeking relief from that detention, along with what standard of review the courts of review should apply in evaluating the decision of the trial court. Jesse Post was denied pretrial release and later sought review of his pretrial detention. The circuit court denied the motion, finding no substantial change in his circumstances and that no less restrictive means were available to ensure he was not a danger to the community.

The appellate court concluded that a defendant seeking review of a detention order must show a change in circumstances to warrant the trial court reversing its prior order. The appellate court concluded the appropriate standard of review to be for an abuse of discretion. The supreme court scrutinized the language of the statute to find it does require a defendant to show a change in circumstances to warrant review. However, the supreme court found the appropriate standard of review to be the manifest weight of the evidence: the trial court must assess the unique, factual question of whether the defendant is a real and present threat to the community based on the specific, articulable facts of the case, or to prevent his willful flight from prosecution. The court thus found it to be a question of fact, rather than discretion. Post's detention was affirmed.