



(Docket No. 130930)

THE PEOPLE OF THE STATE OF ILLINOIS, Appellant, v.
CORWYN BROWN, Appellee.
Opinion filed January __, 2026.

Chief Justice Neville delivered the judgment of the court, with opinion.

This case concerns which offenses qualify for purposes of sentencing on habitual criminal status, prior to 2021 amendments that make a mandatory life sentence only applicable if the first Class X felony was committed over the age of 21. Corwyn Brown committed his first Class X felony in 1980 at age 17. He committed two more Class X felonies by age 31, in 1993. And in 1995, he was sentenced to mandatory life imprisonment as a habitual criminal. Amendments to the statute in 2021 provided that only offenses committed after age 21 would count toward mandatory life sentencing with armed habitual criminal status; Brown filed a postconviction petition contending that his sentence was improper. The circuit court denied his motion, but the appellate court agreed, regarding the 2021 amendments as a clarification and restoration of the law as it existed at the time he was sentenced in 1995.

The supreme court reversed. It found the 2021 amendments were not retroactive. The public act containing the amendments contained an express effective date in the future, and the statute on statutes would have directed prospective application even if the public act had not contained a future effective date. Amendments to the statute in 2016 had established an age requirement for the first time, and there was no confusion at that time to clarify when the legislature raised that age to 21. The 2021 amendments substantively altered the provision, rather than merely clarifying it.