



(Docket No. 131745)

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

PATRICK WADE, Appellant.

*Opinion filed September 24, 2026.*

Justice O'Brien delivered the judgment of the court, with opinion.

Patrick Wade was convicted of two counts of aggravated kidnapping for two distinct criminal sexual assaults upon one victim. On appeal, Wade argued that one of the aggravated kidnapping convictions must be vacated under the one-act, one-crime rule. The appellate court affirmed his conviction on both counts, finding that each was based on a separate instance of criminal sexual assault during the kidnapping.

The supreme court reversed: the unit of prosecution for aggravated kidnapping was one conviction per single kidnapping. While Wade did commit two separate aggravating assaults upon his kidnapping victim, he only once carried out the criminal act of kidnapping. The supreme court remanded to the circuit court with directions to determine which of the two offenses was the less serious, to be vacated, and to impose sentence on the more serious conviction. Wade's additional convictions for aggravated criminal sexual assault were also affirmed.