



JOHN C. MILHISER

SANGAMON COUNTY
STATE'S ATTORNEY

Room 402, County Complex
200 South Ninth Street
Springfield, IL 62701

Telephone: 217/753-6690
Facsimile: 217/535-3179

May 14, 2026

Sergeant Patrick Murphy
Illinois State Police
Division of Criminal Investigations – Zone 4 Peoria
5415 N. University, Suite 108
Peoria, IL 61614
Via Email: patrick.murphy2@illinois.gov

Re: Springfield Police Department – January 10, 2026 - Officer Involved Shooting
ISP Investigation #26-001371

Dear Sgt. Murphy,

The Sangamon County State's Attorney's Office has concluded its review of the Illinois State Police investigation into the January 10, 2026 officer involved shooting by a Springfield Police Officer. After a thorough and extensive investigation surrounding the shooting of Dominick Hobbs by Springfield Police Officer Michael Reynolds, the evidence does not support the filing of criminal charges against Sergeant Reynolds.

In reaching this conclusion, the Sangamon County State's Attorney's Office carefully reviewed the applicable law and examined all of the evidence contained in the Illinois State Police investigation. It is important to examine the relevant facts available to Sergeant Reynolds at the time he made the decision to discharge his firearm and to understand Illinois law as it applies to this case.

The Law

This case must be evaluated in the context of Illinois law governing the justifiable use of deadly force. In accordance with Illinois law, the facts and circumstances of the case were reviewed with consideration given to the perspective of the officer on the scene. It is important to remember pursuant to 720 ILCS 5/7-5(f) Peace officer's use of force in making arrest, the decision by a peace officer to use force shall be evaluated "from the perspective of a reasonable officer in the same situation, based on the totality of the circumstances known to or perceived by the officer at the time of the decision, rather than with the benefit of hindsight, and that the totality of the circumstances

shall account for occasions when officers may be forced to make quick judgments about using force.”

Illinois law as it applies to the use of force in this matter is set forth in 720 ILCS 5/7-1 Use of force in defense of person and 720 ILCS 5/7-5 Peace officer’s use of force in making arrest. Also applicable is 720 ILCS 5/3-2(b) Affirmative Defense.

720 ILCS 5/7-1 Use of force in defense of person states:

(a) A person is justified in the use of force against another when and to the extent that he reasonably believes that such conduct is necessary to defend himself or another against such other’s imminent use of unlawful force. However, he is justified in the use of force which is intended or likely to cause death or great bodily harm only if he reasonably believes that such force is necessary to prevent imminent death or great bodily harm to himself or another, or the commission of a forcible felony.

720 ILCS 5/7-5 Peace officer’s use of force in making arrest states in part:

(a) A peace officer need not retreat or desist from efforts to make a lawful arrest because of resistance or threatened resistance to the arrest. He is justified in the use of any force which he reasonably believes, based on the totality of the circumstances, to be necessary to effect the arrest and to defend himself or another from bodily harm while making the arrest. However, he is justified in using force likely to cause death or great bodily harm only when: (i) he reasonably believes, based on the totality of the circumstances, that such force is necessary to prevent death or great bodily harm to himself or such other person; or (ii) when he reasonably believes, based on the totality of the circumstances, both that: (1) Such force is necessary to prevent the arrest from being defeated by resistance or escape and the officer reasonably believes that the person to be arrested is likely to cause great bodily harm to another; and (2) The person to be arrested committed or attempted a forcible felony which involves the infliction or threatened infliction of great bodily harm or is attempting to escape by use of a deadly weapon, or otherwise indicates that he will endanger human life or inflict great bodily harm unless arrested without delay.

720 ILCS 5/3-2(b) Affirmative Defense states:

(b) If the issue involved in an affirmative defense, other than insanity, is raised then the State must sustain the burden of proving the defendant guilty beyond a reasonable doubt as to that issue together with all the other elements of the offense.

Self-defense is an affirmative defense. Once properly raised, the burden is on the State to prove beyond a reasonable doubt that the defendant was not justified in using the force which he used.

The Facts

After a review of the ISP investigation, which includes the written reports of Sergeant Raynolds and the other officers involved, the information known to Sergeant Raynolds at the time of the discharge of his firearm on January 10, 2026 includes the following. On January 8, 2026, Barrion Sanders was shot and killed. Sanders was a member of the street gang SQAD. A rival street gang is BP. There is an on-going feud between SQAD and BP. Two days later, on the evening of January 10, 2026 Sergeant Raynolds and Officer Cortes were riding together and received information that a blue Honda with stolen plates, known to be used by SQAD members was on the move. The vehicle was located and determined to be occupied by four individuals all dressed in black with masks.

The four occupants exited the vehicle and began to flee. Sergeant Raynolds indicated that Dominick Hobbs exited wearing all black with a black face covering holding a dark colored pistol in his hand and started to run. Sergeant Raynolds gave several commands to Hobbs to stop, but Hobbs did not comply and continued running from Sergeant Raynolds. At this point, Sergeant Raynolds, according to his report, observed Hobbs with the gun in his right hand with his arm “bent in a ninety-degree angle with the firearm pointed straight forward” putting Officer Cortes in a dangerous position as he was ahead of Hobbs chasing another one of the fleeing occupants of the vehicle. According to Sergeant Raynolds’ report, he “feared for Ofc. Cortes’ life” and he also believed that Hobbs could turn the firearm towards Raynolds and shoot him. At this point Sergeant Raynolds fired several rounds at Hobbs, striking him with one of the rounds. This use of deadly force, the discharging of Officer Raynolds’ weapon, is the subject of the review conducted by the Sangamon County State’s Attorney’s Office to determine if Sergeant Raynolds was justified in the shooting of Dominick Hobbs.

The Springfield Police officers had probable cause to detain Dominick Hobbs as he was armed with a firearm and disobeying police command to stop after jumping out of a car with stolen plates. Having determined that Sergeant Raynolds was a police officer acting in the line of duty and probable cause existed to detain Hobbs, the question becomes: was Sergeant Raynolds legally authorized to use the force he used or can the State sustain its burden of proving beyond a reasonable doubt that he was not justified in using the force which he used. Under 720 ILCS 5/7-5, “the decision by a peace officer to use force shall be evaluated from the perspective of a reasonable officer in the same situation, based on the totality of the circumstances known to or perceived by the officer at the time of the decision, rather than with the benefit of hindsight, and that the totality of the circumstances shall account for occasions when officers may be forced to make quick judgments about using force.” Sergeant Raynolds’ report asserts facts that would support raising the defense of self-defense, which once properly raised, places the burden on the State to prove beyond a reasonable doubt that the defendant was not justified in using the force, which he used.

In analyzing Sergeant Raynolds’ actions, we must focus on his perceptions and actions in determining whether it was objectively reasonable for a police officer in Raynolds’ position to believe he or another was in imminent fear of death or great bodily harm when he discharged his firearm. In determining whether Sergeant Raynolds’ actions were objectively reasonable, the United States Supreme Court has held that “The ‘reasonableness’ of a particular use of force must be judged from the perspective of a reasonable officer on the scene, rather than with the 20/20 vision of hindsight.” *Graham v. Connor*, 490 U.S. 389 at 396 (1989). Simply put, when making a criminal

charging decision the issue becomes can the State prove beyond a reasonable doubt that Officer Raynolds was not justified in using deadly force.

The law requires that the review must take into consideration occasions when officers may be forced to make quick judgments about using force. Under 720 ILCS 5/7-5(f), "the totality of the circumstances shall account for occasions when officers may be forced to make quick judgments about using force." Dominick Hobbs was armed with a gun in close proximity to Officer Cortes and Sergeant Raynolds as they were conducting a lawful investigation and the vehicle from which Hobbs fled was a known gang vehicle that had been used in previous shootings. Probable cause existed for the officers to detain Hobbs. Hobbs was dressed in all black, carrying a handgun, and disregarding police officer commands to stop. As Hobbs was running, his arm was raised pointing the gun in the direction of Officer Cortes. The totality of these circumstances supports a reasonable belief that Hobbs was an imminent deadly threat to officers or the public. This reasonable belief by Sergeant Raynolds justifies his subsequent use of deadly force in discharging his firearm. A Glock handgun with an extended loaded magazine was recovered at the scene next to Hobbs. This gun was sent to the Illinois State Police Crime Lab, where Hobbs' DNA was recovered from the gun. The gun also had a modification on it with a "switch" attached, allowing it to function as a fully automatic machine gun.

Based on the results of the investigation conducted by the Illinois State Police, there is not sufficient evidence to file criminal charges against Sergeant Raynolds for the discharge of his service weapon that struck Hobbs. Indeed, as required by the law, taking into consideration the totality of the circumstances at the time of the shooting, Sergeant Raynolds was justified in the use of deadly force and the discharge of his firearm. I thank the Illinois State Police for conducting a thorough independent investigation.

Yours truly,

A handwritten signature in black ink, appearing to read "John C. Milhiser", with a stylized flourish at the end.

John C. Milhiser
Sangamon County State's Attorney

Cc: Springfield Police Chief Joe Behl