

SUPERIOR COURT OF THE STATE OF DELAWARE

State v. Vonduyke

Vonduyke · No. I.D. No. 2506013076 · Decided May 15, 2026

SUMMARY

The Delaware Superior Court denied Timothy M. Vonduyke’s motion to suppress evidence in a driving-under-the-influence prosecution. The court held that the arresting officer had probable cause for a warrantless DUI arrest based on the totality of the circumstances, including traffic violations, signs of alcohol consumption, testing performance, refusals, and the defendant’s conduct. The court also upheld the blood-sample search warrant after reviewing its redacted four corners and finding a substantial basis for probable cause.

CASE DETAILS

COURT	Superior Court of the State of Delaware
WRITING FOR THE COURT	Sonia Augusthy
JURISDICTION	Delaware Superior Court
DECIDED	May 15, 2026
DOCKET	I.D. No. 2506013076
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved to suppress evidence in a criminal DUI prosecution, challenging both the probable cause supporting his warrantless arrest and the search warrant used to obtain his blood sample.
STANDARD OF REVIEW	Reasonable articulable suspicion and probable cause are assessed under the totality of the circumstances. The State bears the burden of proof when a warrantless arrest is challenged. For a search-warrant challenge, the defendant bears the burden of establishing by a preponderance of the evidence that the search was unlawful; the reviewing court examines the four corners of the warrant, gives great deference to the magistrate, and asks whether the warrant provides a substantial basis for probable cause.
PRECEDENTIAL VALUE	Published
PARTIES	State of Delaware v. Timothy M. Vonduyke

TOPICS

suppression of evidence

probable cause

search and seizure

fourth amendment

criminal procedure

PRACTICE AREAS

criminal procedure

DUI

evidence

QUESTIONS PRESENTED

1. Whether Sergeant Olicker had reasonable articulable suspicion to stop Vonduyke's vehicle for a traffic offense.
2. Whether the totality of the circumstances established probable cause to arrest Vonduyke without a warrant for driving under the influence.
3. Whether the redacted four corners of the search warrant established probable cause to believe that evidence of driving under the influence would be found in Vonduyke's blood.

HOLDINGS

1. The unilluminated taillight supplied sufficient reasonable articulable suspicion to stop Vonduyke's vehicle for a traffic offense.
2. The totality of the circumstances established probable cause to arrest Vonduyke for driving under the influence.
3. The redacted search warrant established a fair probability that evidence of DUI would be found in Vonduyke's blood, and Vonduyke did not prove by a preponderance of the evidence that the warrant was unlawful.

KEY QUOTATIONS

“The Court finds Sergeant Olicker had sufficient reasonable articulable suspicion to stop the vehicle for a traffic offense.”

“The Court also finds the State has met its burden of establishing probable cause for a warrantless arrest, based on the totality of the circumstances.”

“The search warrant outlines practical facts establishing probable cause that evidence of the crime of driving under the influence would be found in Mr. Vonduyke’s blood.”

FACTUAL BACKGROUND

Sergeant Olicker observed that Vonduyke's Jeep had an unilluminated taillight and took approximately one-quarter mile to stop after the officer activated his lights. During the encounter, the officer observed bloodshot eyes and a strong odor of alcohol, and Vonduyke performed poorly on a counting test, refused field-sobriety and breath testing, attempted to negotiate alternatives to arrest, and became increasingly insulting and resistant. A redacted search warrant recited several of these facts, including the traffic violation, bloodshot eyes, odor of alcohol, difficulty with the counting test, and refusals to test, and authorized collection of a blood sample.

PROCEDURAL HISTORY

The Superior Court held a suppression hearing on May 5, 2026, received testimony concerning the warrantless arrest, and reviewed the redacted search warrant under a four-corners analysis. The court denied the motion to suppress.

DISPOSITION

other

CASES CITED

- Swanson v. State, 351 A.3d 496 (Del. 2025)
- Bease v. State, 884 A.2d 495, 498-500 (Del. 2005)
- Lefebvre v. State, 19 A.3d 287, 292-295 (Del. 2011)
- Jones v. State, 745 A.2d 856, 861 (Del. 1999)
- Houston v. State, 251 A.3d 102, 108-109 (Del. 2021)
- Caldwell v. State, 780 A.2d 1037, 1045-1046 (Del. 2001)
- Flowers v. State, 195 A.3d 18, 24 (Del. 2018)
- Clendaniel v. Voshell, 562 A.2d 1167, 1170 (Del. 1989)
- Hunter v. State, 783 A.2d 558, 560 (Del. 2001)
- State v. Adams, 13 A.3d 1162, 1166 (Del. Super. Ct. 2008)
- State v. Sisson, 883 A.2d 868, 875 (Del. Super. Ct. 2005)
- Bowie v. State, 307 A.3d 327, at *2 (Del. 2023)
- Church v. State, 11 A.3d 226, at *2 (Del. 2010)
- Missouri v. McNeely, 569 U.S. 141 (2013)
- State v. Holden, 60 A.3d 1110, 1114-1116 (Del. 2013)
- Illinois v. Gates, 462 U.S. 213, 237-239 (1983)
- State v. Clifton, 2024 WL 3201166, at *4 (Del. Super. Ct. 2024)
- State v. Chaffier, 2023 WL 1872284, at *2 (Del. Super. Ct. 2023)
- Franks v. Delaware, 438 U.S. 154 (1978)
- LeGrande v. State, 947 A.2d 1103, 1108 (Del. 2008)

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