

COURT OF APPEALS OF GEORGIA

Randolph v. The State

A26A0015 · No. A26A0015 · Decided April 21, 2026

SUMMARY

The Georgia Court of Appeals considered an interlocutory appeal from the denial of Stanley Randolph's motion to suppress evidence obtained during a police detention and search. The court held that officers lacked a reasonable, articulable suspicion to justify the second-tier investigative detention based on the circumstances observed before the detention. It reversed the trial court's order denying suppression.

CASE DETAILS

COURT	Court of Appeals of Georgia
WRITING FOR THE COURT	Rickman, Presiding Judge; Brown, Chief Judge; Mercier, Judge
JURISDICTION	Georgia Court of Appeals
DECIDED	April 21, 2026
DOCKET	A26A0015
DISPOSITION	reversed
PROCEDURAL POSTURE	Interlocutory appeal from the denial of Randolph's motion to suppress and motion in limine after the trial court issued a certificate of immediate review and the Court of Appeals granted his application.
STANDARD OF REVIEW	The appellate court construes the evidentiary record in the light most favorable to the trial court's factual findings and judgment, accepts findings of disputed fact unless clearly erroneous, and independently reviews questions of law.
PRECEDENTIAL VALUE	Published Georgia Court of Appeals opinion
PARTIES	Stanley Randolph v. The State

TOPICS

- suppression of evidence
- search and seizure
- criminal procedure
- appellate procedure
- standard of review

PRACTICE AREAS

- criminal procedure
- constitutional criminal procedure
- search and seizure
- appellate procedure

QUESTIONS PRESENTED

1. Whether the officers' conduct constituted a second-tier investigative detention rather than a consensual first-tier encounter.
2. Whether the officers had a particularized and objective basis, or reasonable articulable suspicion, to detain Randolph before observing the suspected marijuana.
3. Whether the evidence obtained during the detention and subsequent searches should be suppressed as the fruit of an unlawful detention.

HOLDINGS

1. The encounter was a second-tier investigative detention because the officers blocked the sedan from leaving and testified that Randolph was not free to leave.
2. The officers lacked a particularized and objective basis to reasonably suspect that Randolph was engaged in or had engaged in criminal activity before the detention.
3. Because the detention was unsupported by reasonable articulable suspicion, the trial court erred in denying Randolph's motion to suppress evidence obtained as a result of the detention and subsequent search.

KEY QUOTATIONS

“a person’s mere presence in a high crime area does not give rise to reasonable suspicion of criminal activity, even if police observe conduct which they believe is consistent with a general pattern of such activity.” (6)

“Under the circumstances, Randolph’s encounter with the officers was a second-tier investigative detention which, in order to be lawful, required the officers to have “a particularized and objective basis” for suspecting that Randolph was or was about to be involved in criminal activity.” (6)

FACTUAL BACKGROUND

Police officers encountered Randolph and Carlos Perez sitting in a sedan parked in a cul-de-sac in a high-crime area at approximately 10:30 p.m., with the vehicle's headlights illuminated. The officers observed purported furtive movements but no traffic violation or illegal parking, and they blocked the sedan from leaving. After questioning the occupants and deciding to request a K-9 sniff, officers saw suspected marijuana in an open backpack as Perez exited, handcuffed both men, and searched the backpack, vehicle, and Randolph's person.

PROCEDURAL HISTORY

Randolph was indicted for possession of marijuana with intent to distribute, possession of a firearm during the commission of a felony, and possession of marijuana with intent to distribute within 1,000 feet of a publicly owned housing project. He moved to suppress evidence obtained during the police encounter and search. After a hearing, the trial court denied the motion, finding that the officers had reasonable and articulable suspicion to justify a brief detention and request that the occupants exit the vehicle. The Court of Appeals granted interlocutory review and reversed.

DISPOSITION

reversed

CASES CITED

- Westbrook v. State, 308 Ga. 92, 96(2) (839 SE2d 620) (2020)
- Hughes v. State, 296 Ga. 744, 746(1), 750(2) (770 SE2d 636) (2015)
- State v. Copeland, 310 Ga. 345, 351-52(2)(b) (850 SE2d 736) (2020)
- State v. Mrozowski, 371 Ga. App. 501, 503-04 (901 SE2d 327) (2024)
- In the Interest of J. B., 314 Ga. App. 678, 681(1) (725 SE2d 810) (2012)
- Bien-Aime v. State, 361 Ga. App. 645, 652(1), 653(1) (865 SE2d 224) (2021)
- Hughes v. State, 269 Ga. 258, 261(1) (497 SE2d 790) (1998)
- Adkinson v. State, 322 Ga. App. 1, 3-4 (743 SE2d 563) (2013)
- State v. White, 197 Ga. App. 426, 426-27 (398 SE2d 778) (1990)
- Lewis v. State, 323 Ga. App. 709, 713 (747 SE2d 867) (2013)