

SUPREME COURT OF THE STATE OF DELAWARE

Heck v. State

Heck v. State · No. No. 79, 2025 · Decided April 17, 2026

SUMMARY

The Delaware Supreme Court affirmed Stephen Heck’s conviction for first-degree murder. The Court held that the affidavit established probable cause for obtaining Heck’s cell-site location information and that presumptive blood-test evidence was sufficiently reliable for admission under Delaware Rule of Evidence 702. The Court also rejected Heck’s unpreserved prosecutorial-misconduct claim concerning the prosecutor’s statement about the estimated time of death.

CASE DETAILS

COURT	Supreme Court of the State of Delaware
WRITING FOR THE COURT	N. Christopher Griffiths; Chief Justice Seitz; Justice Valihura; Justice Traynor; Justice Legrow; Justice Griffiths
JURISDICTION	Supreme Court of the State of Delaware
DECIDED	April 17, 2026
DOCKET	No. 79, 2025
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from a criminal conviction and life sentence in the Superior Court of the State of Delaware. The defendant challenged the denial of a motion to suppress cell-site location information, the admission of presumptive serology evidence and related expert testimony, and an unpreserved prosecutorial-misconduct claim.
STANDARD OF REVIEW	Denial of a suppression motion following an evidentiary hearing challenging the sufficiency of a search warrant is reviewed for abuse of discretion. Admission of evidence under Delaware Rule of Evidence 702 is also reviewed for abuse of discretion. Claims raised for the first time on appeal are reviewed for plain error; in a plain-error review of prosecutorial misconduct, the court first reviews de novo whether misconduct occurred.
PRECEDENTIAL VALUE	Published Delaware Supreme Court en banc opinion; precedential value is not otherwise specified in the source.
PARTIES	Stephen Heck v. State of Delaware

TOPICS

suppression of evidence

probable cause

search and seizure

expert testimony

prosecutorial misconduct

PRACTICE AREAS

criminal procedure

evidence

appellate procedure

QUESTIONS PRESENTED

1. Whether the affidavit supporting the warrant for Heck's cell-site location information established probable cause and a logical nexus between the requested CSLI and evidence of Amalfitano's murder.
2. Whether presumptive Bluestar and reduced phenolphthalein blood tests, together with related expert testimony, satisfied Delaware Rule of Evidence 702's reliability requirement.
3. Whether the prosecutor's inaccurate statement about the estimated time of death constituted prosecutorial misconduct and plain error requiring reversal.

HOLDINGS

1. The CSLI warrant affidavit established probable cause because, viewed under the totality of the circumstances and within the affidavit's four corners, it demonstrated a logical nexus between Heck's CSLI and evidence related to Amalfitano's murder.
2. The Bluestar and PPB presumptive blood tests and accompanying expert testimony were sufficiently reliable for admission under D.R.E. 702; the rule requires reliability, not conclusive or infallible methods.
3. The prosecutor's statement did not warrant reversal because it was likely an inadvertent mid-sentence correction, and, even assuming intentional misconduct, it did not adversely affect Heck's substantial rights or the fairness and integrity of the trial.

KEY QUOTATIONS

"The law is well established that probable cause to search a location for—or, in the case of CSLI, to demand—particular items or records is demonstrated where a totality of circumstances indicates a 'fair probability that contraband or evidence of a crime will be found' thereby." (10)

"The grounds for the expert's opinion merely have to be good, they do not have to be perfect." (14)

"D.R.E. 702 requires judges to ask a threshold gatekeeping question, 'whether the testimony is the product of reliable principles and methods,' not whether the methods supporting the testimony are 100% conclusive." (14-15)

FACTUAL BACKGROUND

Stephen Heck and Cynthia Amalfitano traveled together to a beach condominium, after which Amalfitano disappeared and was later found dead in Carousel Park. Security footage and cell-site location information placed Heck and Amalfitano together during the relevant period and showed Heck returning to Amalfitano's residence without her. Police obtained warrants for Heck's cell-site location information and other property, and

testing of reddish-brown stains in his vehicle detected possible blood and DNA from both Heck and Amalfitano. A jury convicted Heck of first-degree murder, and the Superior Court sentenced him to life imprisonment.

PROCEDURAL HISTORY

Heck was charged with and convicted of first-degree murder in the Superior Court and sentenced to life imprisonment. Before trial, the Superior Court denied his motion to suppress evidence obtained under a cell-site location information warrant and his motion to exclude serology evidence. Heck appealed, and the Delaware Supreme Court affirmed.

DISPOSITION

affirmed

CASES CITED

- Rybicki v. State, 119 A.3d 663, 668 (Del. 2015)
- Dorsey v. State, 761 A.2d 807, 809-11 (Del. 2006)
- Carpenter v. United States, Carpenter v. United States, 585 U.S. 296, 316 (2018)
- State v. Holden, 60 A.3d 1110, 1114-15 (Del. 2013)
- Gardner v. State, 567 A.2d 404, 409 (Del. 1989)
- Franks v. State, 398 A.2d 783, 785 (Del. 1979)
- Illinois v. Gates, 462 U.S. 213, 238 (1983)
- Rodriguez v. State, 30 A.3d 764, 769 (Del. 2011)
- Ayala v. State, 204 A.3d 829, 834-35 (Del. 2019)
- In re Paoli R.R. Yard PCB Litigation, 35 F.3d 717, 744 (3d Cir. 1994)
- Suber v. State, 2026 WL 184867, at *5-7 (Del. Jan. 15, 2026)
- Morales-Garcia v. State, 2026 WL 278899, at *7 (Del. Feb. 3, 2026)
- Watson v. State, 303 A.3d 37, 43 (Del. 2023)
- Flonnory v. State, 893 A.2d 507, 540 (Del. 2006)
- Wainwright v. State, 504 A.2d 1096, 1100 (Del. 1986)
- United States v. Lauria, 70 F.4th 106, 128 (2d Cir. 2023)

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