

COURT OF APPEALS OF NORTH CAROLINA

State v. Mayfield

No. COA 25-1023 (N.C. Ct. App. May 6, 2026) · No. COA 25-1023 · Decided May 6, 2026

SUMMARY

The North Carolina Court of Appeals reviews the revocation of Isiah Leon Mayfield, Jr.'s probation following violations including absconding supervision, failures to report, drug-test failures, and failure to complete special probation. The court holds that the trial court erroneously found each violation independently sufficient to revoke probation, because only certain statutory violations authorized revocation. It reverses that finding but affirms the judgment revoking probation and activating the suspended sentence based on the absconding violations.

CASE DETAILS

COURT	Court of Appeals of North Carolina
WRITING FOR THE COURT	April Wood; Stroud; Arrowood
JURISDICTION	North Carolina Court of Appeals
DECIDED	May 6, 2026
DOCKET	COA 25-1023
DISPOSITION	other
PROCEDURAL POSTURE	Defendant appealed from a judgment revoking probation and activating a suspended sentence. Appointed counsel filed an Anders brief, asserting that no issue had sufficient merit to support a meaningful argument for relief.
STANDARD OF REVIEW	Under Anders and State v. Kinch, the Court of Appeals independently examined the full record to determine whether the appeal was wholly frivolous. The court reviewed whether the statutory requirements for probation revocation and sentence activation were satisfied.
PRECEDENTIAL VALUE	Published North Carolina Court of Appeals opinion
PARTIES	Isiah Leon Mayfield, Jr. v. State of North Carolina

TOPICS

- probation
- criminal procedure
- appellate procedure
- standard of review

PRACTICE AREAS

criminal procedure

probation

appellate procedure

QUESTIONS PRESENTED

1. Whether the trial court properly revoked Defendant's probation under North Carolina's statutory limitations on probation revocation.
2. Whether the trial court's written finding that each alleged probation violation independently supported revocation was erroneous.
3. Whether the activated sentence was authorized by statute.

HOLDINGS

1. A trial court may revoke probation under N.C. Gen. Stat. § 15A-1344(a) on the statutory grounds of committing a criminal offense or absconding from supervision when the defendant has not previously been confined for probation violations; therefore, the trial court's finding that every listed violation independently supported revocation was erroneous insofar as it treated failures to report, failure to complete special probation, and failed drug tests as independent grounds for revocation.
2. The trial court properly revoked Defendant's probation because the record supported willful absconding from supervision, a statutory ground for revocation.
3. The activated sentence was authorized because Defendant pleaded guilty to a Class F felony, had prior record level III, and was sentenced within the presumptive range under N.C. Gen. Stat. § 15A-1340.17; upon the valid finding of absconding, the suspended sentence was properly activated.

KEY QUOTATIONS

"However, when this Court is "able to ascertain that the trial court properly weighed the probation violations" and it is clear "the revocation of Defendant's probation was based upon [grounds listed in N.C. Gen. Stat. § 15A-1344(a)]," the trial court's judgment should be affirmed." (at 5)

"Upon a full review of the record pursuant to our duty under Anders and Kinch, we affirm the trial court's judgment revoking Defendant's probation." (at 7)

FACTUAL BACKGROUND

Defendant pleaded guilty to felony hit and run resulting in death and received a suspended term of 21 to 35 months' imprisonment, supervised probation, and 30 days of special probation. His probation officer later reported drug-test failures, failures to report, failure to complete special probation, and two instances of absconding from supervision. At the revocation hearing, Defendant attributed missed reporting obligations to threats and other dangers related to undercover work with police, but the trial court found that he had willfully absconded and revoked probation.

PROCEDURAL HISTORY

Defendant pleaded guilty to felony hit and run resulting in death and received a suspended sentence with supervised and special probation. His probation officer filed four violation reports, and after a hearing the Iredell County Superior Court revoked probation based principally on two alleged instances of absconding, while its written judgment also stated that each listed violation independently supported revocation. The Court of Appeals conducted an Anders review, reversed the erroneous written finding concerning the additional violations, and affirmed the judgment as modified.

DISPOSITION

other

CASES CITED

- Anders v. California, 386 U.S. 738, 87 S. Ct. 1396, 18 L.Ed.2d 493 (1967)
- State v. Kinch, 314 N.C. 99, 331 S.E.2d 665 (1985)
- State v. Hemingway, 278 N.C. App. 538, 544, 863 S.E.2d 279, 283 (2021)
- State v. Daniels, 290 N.C. App. 443, 445, 447, 893 S.E.2d 212, 214-15 (2023)
- State v. Turner, 239 N.C. App. 450, 455, 768 S.E.2d 356, 359 (2015)
- State v. McCullough, 297 N.C. App. 183, 189, 909 S.E.2d 889, 895 (2024)
- State v. Jones, 293 N.C. App. 182, 898 S.E.2d 810 (2024) (unpublished)
- State v. Moss, 299 N.C. App. 559, 916 S.E.2d 294 (2025) (unpublished), disc. rev. denied, 923 S.E.2d 232 (N.C. 2025)
- State v. Tilghman, 294 N.C. App. 550, 901 S.E.2d 698 (2024) (unpublished)

OPINION

JUDGE APRIL WOOD, J.

IN THE COURT OF APPEALS OF NORTH CAROLINA No. COA 25-1023 Filed 6 May 2026
Iredell County, No. 20CRS053289-480 STATE OF NORTH CAROLINA v. ISIAH LEON
MAYFIELD, JR. Appeal by Defendant from judgment entered 7 May 2025 by Judge Joseph N.
Crosswhite in Iredell County Superior Court. Heard in the North Carolina Court of Appeals on 11
March 2026. Attorney General Jeff Jackson, by Assistant Attorney General Angelica D.
Richardson, for the State.

Appellate Defender Glenn Gerding, by Assistant Appellate Defender Katy Dickinson-Schultz, for
the Defendant. WOOD, Judge. Isiah Leon Mayfield, Jr. (“Defendant”) appeals from a judgment
revoking his probation due to probation violations. Counsel representing Defendant is unable to
identify any issue with sufficient merit to support a meaningful argument for relief on appeal and
asks this Court to conduct its own review of the record in accordance with Anders v. California,
386 U.S. 738, 87 S. Ct.

1396, 18 L.Ed.2d 493 (1967). After a thorough examination of the record, we recognize an erroneous finding within the trial court's written judgment and reverse that finding. However, the remaining findings support the trial court's revocation of Defendant's probation, and we affirm STATE V. MAYFIELD Opinion of the Court the trial court's judgment.

I. Factual and Procedural Background On 17 May 2023, Defendant pleaded guilty to felony hit and run resulting in death. Defendant was sentenced to 21 to 35 months of imprisonment suspended for 36 months of supervised probation. Defendant also was sentenced to 30 days of special probation. Defendant's probation officer filed four probation violation reports.

First, on 20 December 2023, the probation officer reported Defendant had tested positive for marijuana and cocaine during the 14 December drug test and refused to complete his special probation as ordered by the trial court.

Second, on 19 February 2024, the probation officer reported Defendant failed to report to his supervising officer as instructed on 16 February and 19 February. Third, on 22 August 2024, the probation officer reported Defendant was in superior court for a probation violation on 23 July but left abruptly in the middle of the session. His case was called, and he failed to respond.

He refused to make himself available for supervision as instructed by this probation officer and after all attempts to locate him were unsuccessful, his probation officer reported he had absconded supervision. Additionally, he failed to report as instructed for routine office appointments on 6 August and 20 August.

Finally, on 22 November 2024, his probation officer reported Defendant once again had absconded supervision by refusing to make himself available on 29 October after he failed to report to superior court for his 29 October probation violation hearing. Additionally, -2- STATE V. MAYFIELD Opinion of the Court he failed a routine drug test on 3 October by testing positive for Cocaine and failed to report on 1 November as instructed for his monthly office appointment.

On 10 April 2025, Defendant's probation violations came on for hearing. Defendant denied the violations. Officer Stephen Cantor ("Officer Cantor"), Defendant's probation officer, Defendant, and his fiancé testified. During cross-examination Officer Cantor testified he was aware Defendant was working undercover with the police department.

However, Officer Cantor also made it clear to Defendant that regardless of the police interaction or resulting threats, he was "still obligated to come see me, to report to the office." Officer Cantor outlined the numerous instances Defendant had failed to follow his probation requirements including absconding. Defendant testified he was doing his best to maintain contact with his probation officer while dealing with the threats, shootings, and other consequences of him working undercover for the police.

His attorney argued that under those conditions any missed appointments did not rise to the level of willful absconding. At the end of the probation hearing, the trial court orally stated Defendant had violated the terms of his probation, “specifically [for] both counts of absconding.” However, the trial court’s written findings indicated it was revoking Defendant’s probation for all of the allegations listed in the four violation reports including but not limited to the two allegations of absconding and “each violation [was], in and of -3- STATE V. MAYFIELD Opinion of the Court itself, a sufficient basis upon which this Court should revoke probation and activate the suspended sentence.” Defendant gave oral notice of appeal.

II. Analysis Counsel has filed a brief pursuant to *Anders v. California*, 386 U.S. 738, 87 S. Ct. 1396, 18 L.Ed.2d 493 (1967), and *State v. Kinch*, 314 N.C. 99, 331 S.E.2d 665 (1985), indicating she “is unable to identify an issue with sufficient merit to support a meaningful argument for relief on appeal.” Counsel asks this Court to conduct its own review of the record for possible prejudicial error and to determine whether counsel overlooked any meritorious issues.

Pursuant to *Anders* and *Kinch*, this Court “then proceeds, after a full examination of all the proceedings, to decide whether the case is wholly frivolous.” *Anders*, at 744, 87 S.Ct. at 1400, 18 L.Ed.2d at 498. Counsel identified potential issues to assist in our independent review, namely: (1) whether the probation was properly revoked; and (2) whether Defendant’s sentence was authorized to be imposed by statute.

A. Probation Revocation Upon review, Defendant’s probation revocation was in accordance with N.C. Gen. Stat. §15A-1344. However, we discern the trial court’s judgment contains an erroneous finding. “The court may only revoke probation for a violation of a condition of probation under G[en]. S[tat]. §15A-1343(b)(1) or G[en]. S[tat]. §15A-1343(b)(3a)[.]” N.C.

Gen. Stat. § 15A-1344(a). Therefore, an offender must commit a criminal offense or -4- STATE V. MAYFIELD Opinion of the Court abscond probation in order for a trial court to revoke probation if the Defendant has not been previously confined due to violations of probation. See *State v. Hemingway*, 278 N.C. App. 538, 544, 863 S.E.2d 279, 283 (2021).

In its judgment revoking Defendant’s probation, the trial court listed the violations in all four probation violation reports, rather than the two absconding violations it noted orally, as its reason for revoking probation. These additional violations included failure to report as instructed, failure to complete special probation as soon as possible, and failure of drug tests.

The trial court then checked finding of fact box 4, which states “[e]ach violation is, in and of itself, a sufficient basis upon which this Court should revoke probation and activate the suspended sentence.” This Court has previously held “when a trial court makes a written finding that each violation is a sufficient basis upon which it may revoke probation, ‘the written order controls for purposes of appeal.’” *State v. Daniels*, 290 N.C.

App. 443, 445, 893 S.E.2d 212, 214 (2023) (quoting *State v. Hemingway*, 278 N.C. App. 538, 544, 863 S.E.2d 279, 283 (2021)). As noted, Defendant's probation could not be revoked on the basis of each of the additional violations listed in its written order apart from the two allegations of absconding. See N.C. Gen. Stat. § 15A-1344(a).

The trial court's finding 4 is therefore erroneous and as it provides the necessary support for the conclusion that Defendant's probation could be revoked for the additional violations in and of themselves, it must be reversed.

However, when this Court is "able to ascertain that the trial court properly weighed the probation violations" and it is clear -5- STATE V. MAYFIELD Opinion of the Court "the revocation of Defendant's probation was based upon [grounds listed in N.C. Gen. Stat. § 15A-1344(a)]," the trial court's judgment should be affirmed. *State v. Daniels*, 290 N.C. App. 443, 447, 893 S.E.2d 212, 215 (2023).

This is also consistent with our holding that "a trial court's ruling must be upheld if it is correct upon any theory of law, and thus it should not be set aside merely because the court gives a wrong or insufficient reason for [it]." *State v. Turner*, 239 N.C. App. 450, 455, 768 S.E.2d 356, 359 (2015) (alteration in original) (citations omitted).

In the case sub judice, in addition to finding of fact box 4, the trial court also checked finding of fact box 5 indicating that Defendant's probation was being revoked "for the willful violation of the condition(s) that he/she not commit any criminal offense, G.S. 15A-1343(b)(1), or abscond from supervision, G.S. 15A-1343(b)(3a)[.]" This is consistent with the trial court's oral statement at the hearing that Defendant had violated the terms of his probation, "specifically [for] both counts of absconding." From the record evidence it is clear the trial court properly weighed the probation violations and correctly revoked Defendant's probation for absconding.

Therefore, we affirm the trial court's judgment revoking Defendant's probation. We note the erroneous selection of finding of fact box 4 on the Judgment and Commitment Upon Revocation of Probation form has become a repetitive error reviewed by this Court. See, e.g., *State v. Daniels*, 290 N.C. App. 443, 447, 893 S.E.2d 212, 215 (2023); *State v. Hemingway*, 278 N.C.

App. 538, 544, 863 S.E.2d 279, 283 (2021); *State v. McCullough*, 297 N.C. App. 183, 189, 909 S.E.2d 889, 895 (2024); *State v. Jones*, 293 N.C. App. 182, 898 S.E.2d 810 (2024) (unpublished); *State v. Moss*, 299 N.C. App. 559, 916 S.E.2d 294 (2025) (unpublished), disc. rev. denied, 923 S.E.2d 232 (N.C. 2025); *State v. Tilghman*, 294 N.C.

App. 550, 901 S.E.2d 698 (2024) (unpublished). We take this opportunity to admonish the trial courts to be mindful of the statutory limitations as to the grounds on which a defendant's probation may be revoked and to be careful in its selection of the appropriate finding of fact box on the

preprinted form provided by the Administrative Office of Courts when preparing probation revocation hearing judgments.

B. Sentence Authorization Defendant pleaded guilty to felony hit and run resulting in death, a class F felony. The trial court correctly determined that Defendant's prior record level was Level III and sentenced him within the presumptive range based on N.C. Gen. Stat. § 15A-1340.17. Upon finding Defendant in violation of his probation for absconding, the trial court properly activated the suspended sentence.

Counsel shows to the satisfaction of this Court that she has complied with the requirements of Anders and Kinch, by advising Defendant of his right to file written arguments with this Court and providing him with the documents necessary to so do. Defendant has not filed any written arguments with this Court, and a reasonable time for him to have done so has expired.

Conclusion Upon a full review of the record pursuant to our duty under Anders and Kinch, -7-
STATE V. MAYFIELD Opinion of the Court we affirm the trial court's judgment revoking Defendant's probation. AFFIRMED AS MODIFIED. Judges STROUD and ARROWOOD concur.
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