

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)