

SUPREME COURT OF DELAWARE

Cruz-Webster v. State

No. 478, 2025 (Del. May 8, 2026) · No. No. 478, 2025 · Decided May 8, 2026

SUMMARY

The Delaware Supreme Court affirmed the denial of Maurice Cruz-Webster’s motion to correct an allegedly illegal sentence. The Court held that his life-imprisonment sentence for first-degree murder was authorized under 11 Del. C. § 4209, notwithstanding the absence of a jury finding of an aggravating circumstance and the constitutional invalidation of Delaware’s capital-sentencing procedure.

CASE DETAILS

COURT	Supreme Court of Delaware
WRITING FOR THE COURT	Collins J. Seitz, Jr., Chief Justice; Karen L. Valihura, Justice; N. Christopher Griffiths, Justice
JURISDICTION	Supreme Court of the State of Delaware
DECIDED	May 8, 2026
DOCKET	No. 478, 2025
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from the Superior Court of Delaware's denial of a motion for correction of an illegal sentence; the State moved to affirm.
STANDARD OF REVIEW	The denial of a motion for correction of an illegal sentence is reviewed for abuse of discretion, while questions of law are reviewed de novo.
PRECEDENTIAL VALUE	Published Delaware Supreme Court opinion; precedential value indicated by the provided metadata.
PARTIES	Maurice Cruz-Webster v. State of Delaware

TOPICS

- sentencing
- criminal procedure
- appellate procedure
- statutory interpretation
- sixth amendment

PRACTICE AREAS

- Criminal law
- Criminal procedure
- Sentencing
- Appellate procedure
- Statutory interpretation

QUESTIONS PRESENTED

1. Whether Cruz-Webster's designation as a non-capital murder defendant meant that the Superior Court lacked jurisdiction to sentence him for first-degree murder.
2. Whether Cruz-Webster's life sentence under 11 Del. C. § 4209 was illegal because a jury had not found a statutory aggravating circumstance.
3. Whether Cruz-Webster was required to be sentenced under 11 Del. C. § 4205(b)(1), rather than § 4209, following *Erlinger v. United States*.

HOLDINGS

1. The non-capital designation did not alter the offense for which Cruz-Webster was indicted and convicted. He was convicted of first-degree murder under 11 Del. C. § 636(a)(1), a felony over which the Superior Court had jurisdiction.
2. Cruz-Webster's life sentence was lawful. Under the version of § 4209 applicable to his offense, aggravating circumstances were required for a death sentence; absent such a finding, the statute mandated life imprisonment without parole.
3. *Erlinger* did not render Cruz-Webster's life sentence illegal or require resentencing under § 4205(b)(1). The Superior Court properly sentenced him under § 4209.

KEY QUOTATIONS

*“A defendant whose death sentence is vacated under *Rauf and Powell* must be resentenced to the punishment the General Assembly has specified as the alternative to death: life without parole.”* (¶ 7)

“The jury found Cruz-Webster guilty of first-degree murder beyond a reasonable doubt, and the Superior therefore legally sentenced him to life imprisonment as required by Section 4209.” (¶ 8)

FACTUAL BACKGROUND

A Superior Court jury found Maurice Cruz-Webster guilty of first-degree murder and other offenses. The murder conviction was under 11 Del. C. § 636(a)(1), and the offense occurred after Cruz-Webster turned eighteen. The Superior Court imposed life imprisonment under the then-effective version of 11 Del. C. § 4209, which provided death or life imprisonment without parole for qualifying first-degree murder convictions.

PROCEDURAL HISTORY

A Superior Court jury convicted Cruz-Webster in 2016 of first-degree murder and other crimes, and the court imposed life imprisonment for murder and fifteen years of nonsuspended imprisonment for the other offenses. The Delaware Supreme Court affirmed on direct appeal, and Cruz-Webster later pursued unsuccessful postconviction and habeas proceedings. In June 2025, he moved to correct his sentence as illegal based on *Erlinger v. United States*; the Superior Court denied the motion, and the Supreme Court affirmed.

DISPOSITION

affirmed

CASES CITED

- Cruz-Webster v. State, 2017 WL 464536 (Del. Feb. 2, 2017)
- Cruz-Webster v. Emig, 2024 WL 5154528 (D. Del. Dec. 18, 2024)
- State v. Cruz-Webster, 2020 WL 5117967 (Del. Super. Ct. Aug. 31, 2020)
- Fountain v. State, 2014 WL 4102069, at *1 (Del. Aug. 19, 2014)
- Brittingham v. State, 705 A.2d 577, 578 (Del. 1998)
- Erlinger v. United States, 602 U.S. 821 (2024)
- Rauf v. State, 145 A.3d 430 (Del. 2016)
- Powell v. State, 153 A.3d 69 (Del. 2016)
- Zebroski v. State, 179 A.3d 855 (Del. 2018)
- Riley v. State, 2019 WL 3956411, at *2 (Del. Aug. 21, 2019)
- Manley v. State, 2018 WL 6434791, at *1 (Del. Dec. 6, 2018)
- Reed v. State, 2024 WL 4457496, at *2 (Del. Oct. 9, 2024)

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