

COURT OF APPEALS OF ARKANSAS, DIVISION II

Tyler Dylan Brock v. State of Arkansas

Brock, 2026 Ark. App. 201 (Ark. Ct. App. 2026) · No. CR-25-435 · Decided April 1, 2026

SUMMARY

The Arkansas Court of Appeals affirmed the revocation of Tyler Dylan Brock's probation after finding that his statement that God told him to kill his mother constituted first-degree terroristic threatening under Arkansas law. The court also upheld the circuit court's decision to impose a six-year prison sentence rather than extend probation or place Brock in HOPE Court.

CASE DETAILS

COURT	Court of Appeals of Arkansas, Division II
WRITING FOR THE COURT	Brandon J. Harrison; Virden; Barrett
JURISDICTION	Arkansas Court of Appeals
DECIDED	April 1, 2026
DOCKET	CR-25-435
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from a judgment revoking probation and sentencing Brock to six years' imprisonment in the Arkansas Division of Correction.
STANDARD OF REVIEW	The court virtually never disturbs a circuit court's decision to impose a particular sentence within the statutory range; the denial of an alternative sentence is reviewed for abuse of discretion.
PRECEDENTIAL VALUE	Published opinion
PARTIES	Tyler Dylan Brock v. State of Arkansas

TOPICS

- criminal procedure
- probation
- sentencing
- first amendment
- appellate procedure

PRACTICE AREAS

- criminal law
- criminal procedure
- sentencing
- constitutional law

QUESTIONS PRESENTED

1. Whether the evidence established that Brock committed first-degree terroristic threatening by purposefully communicating a true threat to his mother.
2. Whether the circuit court abused its discretion by sentencing Brock to six years' imprisonment rather than extending probation or placing him in HOPE Court.

HOLDINGS

1. Brock's statement, "God told me to kill you," constituted a sufficient true threat under the circumstances, and the evidence supported the finding that he purposefully communicated the threat to terrorize his mother.
2. The circuit court did not abuse its discretion by imposing six years' imprisonment instead of extending probation or placing Brock in HOPE Court because the sentence was lawful and within the statutory range.

KEY QUOTATIONS

"Our test for a true threat is "an objective analysis focusing on how a reasonable person would have taken the statement" with five nonexclusive factors:" (at 3)

"Telling her, in a rage, "God told me to kill you" could only have been intended to terrorize her. It was a sufficient threat in the circumstances." (at 4)

FACTUAL BACKGROUND

Brock was serving probation for aggravated assault of his mother, with a condition requiring him to obey all federal and state laws. During an encounter with his mother on December 20, 2024, Brock became agitated and told her that God had told him to kill her; he admitted making the statement. His mother knew that Brock had previously attacked and tried to kill her, and she testified that she was terrified of him. Brock also had a history of serious mental illness and had stopped taking medication.

PROCEDURAL HISTORY

Brock pleaded guilty to aggravated assault of his mother and received a six-year probation sentence in May 2023. The State petitioned to revoke probation after alleging that Brock violated the condition requiring him to obey all federal and state laws by committing first-degree terroristic threatening. After a revocation hearing, the Saline County Circuit Court found the violation and sentenced Brock to six years' imprisonment rather than extending probation or placing him in HOPE Court. The Arkansas Court of Appeals affirmed.

DISPOSITION

affirmed

CASES CITED

- Adams v. State, 2014 Ark. App. 308, 435 S.W.3d 520
- Child v. State, 2025 Ark. App. 76, 705 S.W.3d 904

- Lilly v. State, 2020 Ark. App. 88, 596 S.W.3d 509
- Counterman v. Colorado, 600 U.S. 66 (2023)
- Pinney v. State, 2020 Ark. App. 467, 609 S.W.3d 671
- Ta v. State, 2015 Ark. App. 220, 459 S.W.3d 325
- Rackley v. State, 2025 Ark. App. 369, 716 S.W.3d 219
- Honeycutt v. State, 2020 Ark. App. 449, 608 S.W.3d 631

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