

NEW YORK SUPREME COURT, KINGS COUNTY

People v. Maquila

2025 NY Slip Op 25270 (N.Y. Sup. Ct. Kings County Dec. 17 2025) · No. IND-75016-23 · Decided December 17, 2025

SUMMARY

The Supreme Court, Kings County, considers the defendant's motion to suppress evidence and statements following a combined Dunaway, Huntley, and Payton hearing. The court finds probable cause for the arrest but concludes that the defendant was subjected to custodial interrogation without Miranda warnings and that police entry into his locked shelter room violated the Payton rule. The motion is therefore granted in part and denied in part.

CASE DETAILS

COURT	New York Supreme Court, Kings County
WRITING FOR THE COURT	Edward H. King
JURISDICTION	Supreme Court of the State of New York, Kings County
DECIDED	December 17, 2025
DOCKET	IND-75016-23
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved to suppress evidence and statements following a combined Dunaway, Huntley, and Payton hearing.
STANDARD OF REVIEW	For the Dunaway inquiry, the People initially had to present credible evidence tending to show lawful police conduct, after which the defendant bore the burden of proving illegality by a preponderance of the evidence. Voluntariness of a statement had to be established by the People beyond a reasonable doubt. Voluntary consent to a search was treated as a mixed question of law and fact.
PRECEDENTIAL VALUE	Published trial-court opinion; persuasive authority within New York Supreme Court, subject to higher-court precedent.
PARTIES	The People of the State of New York v. Raymond Maquila

TOPICS

- fourth amendment
- search and seizure
- warrant requirement
- suppression of evidence
- probable cause

PRACTICE AREAS

criminal procedure

constitutional law

criminal defense

QUESTIONS PRESENTED

1. Whether the police had probable cause to arrest the defendant under the fellow-officer rule.
2. Whether statements obtained from the defendant during custodial interrogation were admissible absent prior Miranda warnings.
3. Whether police violated the Payton rule by entering or opening the door to the defendant's locked shelter room without an arrest warrant, exigent circumstances, or valid consent.
4. Whether the defendant had a reasonable expectation of privacy in his assigned shelter room and whether the shelter employee had authority to consent to police entry.

HOLDINGS

1. The arrest was lawful because the police as a whole possessed probable cause, based on the complainant's account, the controlled call, and the probable-cause I-card, even though the arresting detective did not personally possess all of the information.
2. The defendant's statements were suppressed because he was subjected to custodial interrogation without Miranda warnings.
3. The police violated the Payton rule by entering or opening the door to the defendant's locked shelter room to arrest him without a warrant, exigent circumstances, or valid consent; physical evidence obtained as a result was suppressed.
4. A shelter resident may possess a reasonable expectation of privacy in an assigned locked room; determining that expectation requires consideration of the facility's operation, policies, physical layout, use of the space, the occupant's conduct, and screening practices.

KEY QUOTATIONS

*"Even if an arresting officer lacks personal knowledge sufficient to establish probable cause, the arrest will be lawful if the officer 'acts upon the direction of or as a result of communication with a superior or [fellow] officer or another police department provided that the police as a whole were in possession of information sufficient to constitute probable cause to make the arrest.'" (*2)*

*"The court finds that the defendant was subjected to a custodial interrogation for which he should have been provided Miranda warnings. Accordingly, the defendant's motion to suppress the noticed statements is granted." (*3)*

*"The court finds that the police's actions violated the Payton rule prohibiting warrantless entry into a home to conduct an arrest. Any physical evidence seized as a result must be suppressed." (*5)*

FACTUAL BACKGROUND

Police detectives investigating allegations that the defendant sexually assaulted the complainant twice obtained information from the complainant, conducted a controlled telephone call, and activated a probable-cause arrest I-card. Detectives located the defendant at Safe Haven, a transitional homeless shelter, where a shelter employee identified his room and brought officers to it; the defendant was then taken into custody. The defendant testified that his assigned room was locked, that shelter employees had access, and that officers entered or caused the door to be opened without a warrant before ordering him to dress and leave. He also testified that police questioned him at the precinct without first giving Miranda warnings.

PROCEDURAL HISTORY

The court conducted a combined suppression hearing on August 14, 2024. The People presented testimony from two NYPD detectives, and the defendant testified. The court found the witnesses credible, determined that the arrest was supported by probable cause, suppressed the defendant's statements for lack of Miranda warnings, and suppressed physical evidence resulting from the warrantless entry into his shelter room.

DISPOSITION

other

CASES CITED

- People v. Baldwin, 25 N.Y.2d 66 (1969)
- People v. Parker, 180 A.D.3d 1072 (2d Dep't 2020)
- People v. Wheeler, 2 N.Y.3d 370, 374 (2004)
- People v. Harris, 192 A.D.3d 158 (2020)
- People v. McRay, 51 N.Y.2d 594, 601 (1980)
- People v. Horowitz, 21 N.Y.2d 55, 60 (1967)
- People v. Rosario, 78 N.Y.2d 583, 588 (1991)
- People v. Lypka, 36 N.Y.2d 210, 213 (1975)
- People v. Dodt, 61 N.Y.2d 408, 416 (1984)
- People v. Landy, 59 N.Y.2d 369, 375 (1983)
- People v. Witherspoon, 66 N.Y.2d 973, 974 (1985)
- People v. Guilford, 21 N.Y.3d 205, 208-209 (2013)
- People v. Berg, 92 N.Y.2d 701, 704 (1991)
- People v. Rodriguez, 132 A.D.3d 781, 783 (2d Dep't 2015)
- People v. Paulman, 5 N.Y.3d 122, 130-131 (2005)
- People v. Harris, 48 N.Y.2d 208, 215 (1979)
- People v. Yuki, 25 N.Y.2d 585, 589 (1969)
- People v. Ferro, 63 N.Y.2d 316, 322 (1984)
- Rhode Island v. Innis, 446 U.S. 291, 301 (1980)
- Payton v. New York, 445 U.S. 573 (1980)

- People v. Russo, 243 A.D.2d 658, 659 (2d Dep't 1997)
- People v. Read, 74 A.D.3d 1245, 1246 (2d Dep't 2010)
- People v. Cuencas, 40 N.Y.3d 480, 487, 490 (2023)
- People v. Knapp, 52 N.Y.2d 689, 694 (1981)
- United States v. Martinez-Gonzalez, 686 F.2d 93, 100 (2d Cir. 1982)
- United States v. Reed, 572 F.2d 412, 424 (2d Cir. 1978)
- People v. Cloud, 168 A.D.2d 91, 92-94 (1st Dep't 1991), aff'd, 79 N.Y.2d 786 (1991)
- United States v. Matlock, 415 U.S. 164 (1974)
- People v. Valerio, 95 N.Y.2d 924, 925 (2000)
- Coolidge v. New Hampshire, 403 U.S. 443, 493 (1971)
- People v. Adams, 53 N.Y.2d 1, 9-10 (1981)
- People v. Gonzalez, 88 N.Y.2d 289, 295 (1996)
- Prophete v. Acevedo-Smith, 743 F. Supp. 3d 440, 445, 448 (E.D.N.Y. 2024)
- Community for Creative Non-Violence v. Unknown Agents of the U.S. Marshals Service, 791 F. Supp. 1, 6 (D.D.C. 1992)
- United States v. Voice, 622 F.3d 870, 877-78 (8th Cir. 2010)
- People v. Robinson, 300 A.D.2d 511, 511 (2d Dep't 2002)
- People v. Nalbandian, 188 A.D.2d 328, 329 (1st Dep't 1992)
- Callahan v. Carey