

SUPREME COURT OF THE STATE OF NEW YORK, APPELLATE DIVISION,
FIRST DEPARTMENT

People v. Matias

2026 NY Slip Op 00328 (N.Y. Ct. App. 2026) · No. Ind. No. 4295/17; Appeal No. 4883; Case No. 2020-02163 ·
Decided January 27, 2026

SUMMARY

The Appellate Division, First Department unanimously affirmed Jose Matias's conviction for second-degree assault and his four-year sentence as a second felony offender. The court held that his appeal waiver did not bar review of his suppression claim, but concluded that his post-Miranda statements were voluntary under the totality of the circumstances despite troubling assurances by the prosecutor regarding confidentiality. The court also found no basis to disturb the sentence.

CASE DETAILS

COURT	Supreme Court of the State of New York, Appellate Division, First Department
WRITING FOR THE COURT	Manzanet-Daniels, J.P.; Kennedy, J.; Shulman, J.; Michael, J.; Hagler, J.
JURISDICTION	New York Supreme Court, Appellate Division, First Department
DECIDED	January 27, 2026
DOCKET	Ind. No. 4295/17; Appeal No. 4883; Case No. 2020-02163
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed from a judgment of the Supreme Court, New York County, convicting him upon his guilty plea of assault in the second degree and sentencing him as a second felony offender to four years' imprisonment. He challenged the voluntariness of incriminating statements obtained after Miranda warnings and the denial of his suppression motion.
STANDARD OF REVIEW	The Appellate Division reviewed the motion court's factual findings for clear error and independently evaluated whether defendant's statements were voluntary under the totality of the circumstances.
PRECEDENTIAL VALUE	Published opinion; precedential within the applicable New York appellate hierarchy, subject to revision before publication in the Official Reports.

PARTIES

Jose Matias, Defendant-Appellant v. The People of the State of New York, Respondent

TOPICS

criminal procedure

miranda rights

suppression of evidence

appellate procedure

standard of review

PRACTICE AREAS

criminal procedure

appellate procedure

constitutional law

evidence

QUESTIONS PRESENTED

1. Whether defendant's guilty-plea waiver of the right to appeal barred appellate review of his suppression claim.
2. Whether the detective's and prosecutor's assurances concerning confidentiality rendered defendant's post-Miranda statements involuntary under the Due Process Clause.
3. Whether the motion court's factual findings denying suppression were clearly erroneous.
4. Whether defendant's sentence should be reduced.

HOLDINGS

1. The appeal waiver was ineffective to waive review of defendant's suppression claim because a defendant who pleads guilty after an adverse suppression ruling retains the right to appellate review of that ruling.
2. The statements were voluntary under the totality of the circumstances because the assurances, although troubling and potentially misleading, were not so fundamentally unfair or deceptive as to deny due process.
3. The motion court's findings were not clearly erroneous, and there was no basis to overturn the conviction on the suppression issue.
4. There was no basis for reducing the sentence.

KEY QUOTATIONS

"When Miranda warnings are properly provided, "the requisite inference of voluntariness may be relatively easily drawn" absent evidence of "official illegality potentially impairing the voluntariness of a subsequent admission"" ([*1])

"While we do not condone the prosecutor's statements in this case, we find that they were not sufficiently unfair or deceptive to render the defendant's statements involuntary." ([*1])

"To be clear, we are not announcing a blanket rule that the same or similar statements would not give rise to an involuntary confession in another context." ([*1])

FACTUAL BACKGROUND

Defendant was arrested after a home-invasion investigation in which victims identified him and described two apparent package delivery men who had attacked them. He received and waived Miranda warnings before two interrogation sessions, during which a detective and an assistant district attorney made statements assuring him that information about his purported accomplice would not be disclosed. Defendant subsequently admitted involvement, although he denied physically engaging with anyone at the apartment. The court considered his criminal history, familiarity with the criminal process, knowledge that the interviews were recorded, and the absence of an express promise of leniency or an explicit assurance that the statements were off the record.

PROCEDURAL HISTORY

After an adverse suppression ruling concerning his incriminating statements, defendant pleaded guilty in October 2019 to assault in the second degree in exchange for a four-year prison sentence. The Supreme Court sentenced him as promised on February 21, 2020. The Appellate Division held that the appeal waiver did not bar review of the suppression claim, reached the merits, and unanimously affirmed.

DISPOSITION

affirmed

CASES CITED

- People v. Francisco, 171 A.D.3d 536, 537 (1st Dep't 2019), leave denied, 33 N.Y.3d 1104 (2019)
- People v. Aveni, 22 N.Y.3d 1114, 1117 (2014)
- People v. Guilford, 21 N.Y.3d 205, 208 (2013)
- People v. Tarsia, 50 N.Y.2d 1, 11 (1980)
- People v. Martin, 112 A.D.3d 453, 454 (1st Dep't 2013)
- People v. Shakoor, 198 A.D.3d 490, 491 (1st Dep't 2021), leave denied, 38 N.Y.3d 930 (2022)
- People v. Steadman, 82 N.Y.2d 1, 7 (1993)