

NEW YORK COURT OF APPEALS

People v. Jones

2026 NY Slip Op 01447 (N.Y. Ct. App. 2026) · No. No. 20 · Decided March 17, 2026

SUMMARY

The New York Court of Appeals held that evidence recovered after parole investigators pursued and arrested the defendant should have been suppressed. The court concluded that the record did not support a reasonable suspicion or reasonable mistaken belief that the defendant was the parole absconder named in the arrest warrant, particularly because the physical description was generic and the investigators did not establish that the defendant knew he was fleeing from law enforcement. The court reversed the Appellate Division, granted the suppression motion, and directed dismissal of the indictment; Judge Cannataro dissented.

CASE DETAILS

COURT	New York Court of Appeals
WRITING FOR THE COURT	Halligan; Wilson; Rivera; Troutman; Cannataro; Garcia; Singas
JURISDICTION	New York Court of Appeals
DECIDED	March 17, 2026
DOCKET	No. 20
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Appeal from Appellate Division order affirming denial of motion to suppress evidence.
STANDARD OF REVIEW	Whether there is record support for lower courts' finding that pursuit was justified.
PRECEDENTIAL VALUE	Published
PARTIES	Joseph C. Jones v. The People

TOPICS

- search and seizure
- fourth amendment
- exclusionary rule
- probable cause
- criminal procedure

PRACTICE AREAS

- Criminal Law
- Constitutional Law
- Evidence

QUESTIONS PRESENTED

1. Whether the pursuit and arrest of defendant, based on mistaken identification as a parole absconder, was justified under the Hill v. California reasonable belief test or the People v. De Bour reasonable suspicion standard.
2. Whether defendant's flight from plainclothes officers supported reasonable suspicion or reasonable belief.

HOLDINGS

1. The record lacks sufficient support to find that the investigators' pursuit of defendant was justified under either the Hill reasonable belief or De Bour reasonable suspicion standard, because defendant's generic physical description and flight from officers who were not identifiable as law enforcement were insufficient.
2. In this scenario, there is no meaningful difference between Hill's requirement of a reasonable mistaken belief and De Bour's level three standard of reasonable suspicion; both essentially ask whether the totality of circumstances justifies the police-citizen encounter.
3. A match to a generic physical description (height, weight) that fits many people, without more, cannot justify a level three stop or a mistaken arrest.
4. Flight from plainclothes officers in an unmarked car, without evidence defendant knew they were law enforcement, cannot support an inference of criminal activity or that defendant was fleeing from police.

KEY QUOTATIONS

"We conclude that the gun, along with the other recovered evidence, should have been suppressed because there is no record support for the lower courts' finding that the investigators' pursuit of the defendant was justified."

"We need not decide which of the tests should control, because in this scenario we do not perceive a meaningful difference between Hill 's requirement of a reasonable mistaken belief and De Bour 's level three standard of reasonable suspicion."

"The pursuing investigators' testimony does not reveal a sufficiently close match between the defendant's appearance and the identifying details they were given about the parole absconder."

"The defendant's flight from the investigators, on which the Appellate Division majority relied, cannot support an inference that he was the target of the warrant because the record is devoid of any suggestion that he could have known he was fleeing from law enforcement."

"A warrant authorizes arrest only for the person named in the warrant, not for any person the officers may encounter who bears some passing resemblance to the suspect."

FACTUAL BACKGROUND

Parole investigators, seeking a parole absconder with an arrest warrant, approached defendant based on a generic physical description and location tip. Defendant fled, and during pursuit, investigators saw him discard a

handgun. After arrest, they recovered two handguns and narcotics. Defendant was not the intended absconder.

PROCEDURAL HISTORY

Defendant indicted on weapon and drug charges, moved to suppress evidence. Supreme Court denied suppression. Appellate Division affirmed. Defendant appealed.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The order of the Appellate Division should be reversed, the defendant's suppression motion granted, and the indictment dismissed.

CASES CITED

- Hill v California, 401 US 797 (1971)
- People v De Bour, 40 NY2d 210 (1976)
- People v Cleveland, 44 NY3d 8 (2025)
- People v Brannon, 16 NY3d 596 (2011)
- People v Cantor, 36 NY2d 106 (1975)
- People v Holmes, 81 NY2d 1056 (1993)
- People v Carrasquillo, 54 NY2d 248 (1981)
- Illinois v Wardlow, 528 US 119 (2000)
- People v Sierra, 83 NY2d 928 (1994)
- People v Matienzo, 81 NY2d 778 (1993)
- People v Martinez, 80 NY2d 444 (1992)
- People v Guthrie, 25 NY3d 130 (2015)
- Heien v North Carolina, 574 US 54 (2014)
- United States v Glover, 725 F2d 120 (DC Cir 1984)
- People v Porter, 109 AD3d 737 (1st Dept 2013)
- People v Fabian, 126 AD2d 664 (2d Dept 1987)
- People v Tejada, 270 AD2d 655 (3d Dept 2000)
- People v Dortch, 186 AD3d 1114 (4th Dept 2020)
- People v Johnson, 22 AD3d 371 (1st Dept 2005)
- People v Medina, 66 AD3d 555 (1st Dept 2009)
- People v Greenidge, 241 AD2d 395 (1st Dept 1997)
- People v Abdul-Mateen, 126 AD3d 986 (2d Dept 2015)
- People v Smith, 240 AD3d 1218 (4th Dept 2025)

- People v Howard, 129 AD3d 1654 (4th Dept 2015)
- State v Lee, 97 Wis 2d 679 (1980)
- State v Smith, 102 Wash 2d 449 (1984)
- State v Sanders, 339 NW2d 557 (Minn 1983)
- United States v Castle, 825 F3d 625 (DC Cir 2016)
- People v Ebron, 275 AD2d 490 (3d Dept 2000)
- People v Guthrie, 25 NY3d 130 (2015)

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