

ARKANSAS COURT OF APPEALS

Dequon Israel v. State of Arkansas

2026 Ark. App. 158 · No. CR-25-146 · Decided March 4, 2026

SUMMARY

The Arkansas Court of Appeals affirmed the Garland County Circuit Court’s denial of sixteen-year-old Dequon Israel’s motion to transfer capital-murder and aggravated-robbery charges to the juvenile division. The court held that the circuit court properly considered the statutory transfer factors and that its decision was not clearly erroneous, despite evidence supporting rehabilitation and juvenile placement.

CASE DETAILS

COURT	Arkansas Court of Appeals
WRITING FOR THE COURT	Mike Murphy; Gladwin; Wood
JURISDICTION	Arkansas Court of Appeals
DECIDED	March 4, 2026
DOCKET	CR-25-146
DISPOSITION	affirmed
PROCEDURAL POSTURE	Israel, who was sixteen when charged with two counts of capital murder and one count of aggravated robbery, moved to transfer the charges from the criminal division of circuit court to the juvenile division. After the Garland County Circuit Court denied the motion, Israel appealed.
STANDARD OF REVIEW	The denial of a motion to transfer a juvenile case is reviewed for clear error. The appellate court reviews the entire record without reweighing the evidence and examines whether the written findings are accurate and consistent with the evidence, whether any inconsistency is material, whether the order contains sufficient detail, and whether the findings are tailored to the statutory factors and the juvenile's evidence.
PRECEDENTIAL VALUE	Published Arkansas Court of Appeals opinion
PARTIES	Dequon Israel v. State of Arkansas

TOPICS

criminal procedure

appellate procedure

standard of review

PRACTICE AREAS

criminal law

juvenile law

appellate practice

QUESTIONS PRESENTED

1. Whether the circuit court clearly erred by denying Israel's motion to transfer his capital-murder and aggravated-robbery charges to the juvenile division.
2. Whether the circuit court's written findings concerning the statutory transfer factors were inaccurate, insufficiently detailed, or inconsistent with the evidence.
3. Whether the appellate court should reweigh evidence favoring transfer, including Israel's allegedly minor role, positive school and detention records, maturity, diagnosis, and available juvenile services.

HOLDINGS

1. The circuit court did not clearly err in finding that Israel failed to prove by clear and convincing evidence that his case should be transferred to the juvenile division.
2. An appellate court may not reverse a transfer decision merely because some evidence supports transfer or because it would assign different weight to the evidence.
3. The statute does not require proof on every transfer factor, and the circuit court is not required to give equal weight to each factor.

KEY QUOTATIONS

"We will not reverse a circuit court's determination whether to transfer a case unless that decision is clearly erroneous." (at 5)

"Here, the circuit court heard the evidence, weighed it, reached its decision, and enumerated its conclusions in a written order." (at 9)

FACTUAL BACKGROUND

Israel and three accomplices planned to rob Adrianna Howell while buying marijuana from her and knew that Howell did not carry a weapon. When Howell and Mahayla Swayze arrived, Israel possessed a gun, pointed it at Swayze, and ordered her out of the vehicle while an accomplice shot the two women. Israel later disposed of his gun and acknowledged the crimes to his mother. The transfer hearing also included evidence of Israel's prior juvenile offense, conduct disorder and impulsivity, school disciplinary history, positive performance with structure, and the availability or limitations of juvenile rehabilitation programs.

PROCEDURAL HISTORY

The Garland County Circuit Court denied Israel's motion to transfer the charges to the juvenile division after conducting a transfer hearing and entering written findings under Arkansas Code section 9-27-318. Israel timely

appealed, arguing that eight of the circuit court's findings were clearly erroneous. The Arkansas Court of Appeals affirmed.

DISPOSITION

affirmed

CASES CITED

- Lopez v. State, 2021 Ark. App. 467, 637 S.W.3d 318
- Blackburn v. State, 2026 Ark. App. 77, ___ S.W.3d ___
- Minor Child v. State, 2024 Ark. App. 393, 701 S.W.3d 751
- Shaw v. State, 2023 Ark. App. 55, 660 S.W.3d 591
- Anderson v. State, 2026 Ark. App. 2, at 9, ___ S.W.3d ___, ___
- C.B. v. State, 2012 Ark. 220, 406 S.W.3d 796
- Minor Child v. State, 2025 Ark. App. 300, at 10, 715 S.W.3d 117, 124
- Moore v. State, 2018 Ark. App. 516, at 8, 558 S.W.3d 918, 922