

SUPREME COURT OF VIRGINIA

Commonwealth v. Knight-Walker

Knight-Walker · No. 250267 · Decided April 16, 2026

SUMMARY

The Supreme Court of Virginia held that a police officer did not impermissibly prolong a traffic stop by asking the driver brief questions about weapons and drugs. Because the driver’s license was suspended and neither occupant could lawfully drive the vehicle, the officer retained a need to control the scene while awaiting another driver. The court also held that the driver voluntarily consented to the subsequent searches and reversed the Court of Appeals.

CASE DETAILS

COURT	Supreme Court of Virginia
WRITING FOR THE COURT	Justice Stephen R. McCullough; Powell, C.J.; Kelsey, J.; McCullough, J.; Chafin, J.; Russell, J.; Mann, J.; Millette, S.J.
JURISDICTION	Supreme Court of Virginia
DECIDED	April 16, 2026
DOCKET	250267
DISPOSITION	reversed
PROCEDURAL POSTURE	The Commonwealth appealed the Court of Appeals of Virginia's reversal of Knight-Walker's conviction and suppression ruling.
STANDARD OF REVIEW	A Fourth Amendment seizure claim presents a mixed question of law and fact reviewed de novo; factual findings of the trial court receive deference, while the appellate court independently determines whether the manner of obtaining the evidence satisfied constitutional requirements.
PRECEDENTIAL VALUE	Published and precedential
PARTIES	Commonwealth of Virginia v. Nafeesa Rausham Knight-Walker

TOPICS

- fourth amendment
- search and seizure
- suppression of evidence
- criminal procedure
- appellate procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the officer impermissibly prolonged the traffic stop by asking brief questions about weapons and drugs before Knight-Walker's son arrived to take custody of the vehicle.
2. Whether Knight-Walker's consent to the searches was invalid because it was allegedly tainted by an unconstitutional extension of the traffic stop.

HOLDINGS

1. Under the circumstances, the officer did not impermissibly prolong the traffic stop in violation of the Fourth Amendment. The stop remained incomplete because Knight-Walker could not lawfully drive away, her passenger could not drive, and the officer had a continuing need to control the scene while awaiting a person who could lawfully take the vehicle.
2. Knight-Walker's consent was not tainted because the traffic stop was not unlawfully extended, and the circuit court did not err in finding that her consent was voluntary under the totality of the circumstances.

KEY QUOTATIONS

“The mission of the stop at that point was to ensure that Knight-Walker did not continue to break the law by driving away moments after receiving her summons, not simply to issue a summons.” (7)

“Here, Officer Allen’s twelve second exchange, inquiring about weapons, illegal drugs, or “anything crazy,” was reasonable under these particular circumstances.” (9)

“Asking for consent during the course of a still incomplete traffic stop is not the sort of unconstitutional “detour” envisioned by Rodriguez.” (10)

FACTUAL BACKGROUND

Officer Jordan Allen stopped Knight-Walker after observing frequent lane changes and learning that the vehicle's owner had a suspended license; he later determined that Knight-Walker's license was also suspended and that she had prior convictions for driving on a suspended license. After informing her that she could not continue driving and that she would call her son to pick her up, Allen asked brief questions about weapons and drugs and requested consent to search. Knight-Walker consented to the search of her person, purse, and vehicle, where the officer found drug paraphernalia in the glove box.

PROCEDURAL HISTORY

Knight-Walker moved to suppress evidence discovered during a vehicle search, arguing that an officer impermissibly prolonged a traffic stop under *Rodriguez v. United States*. The circuit court denied suppression, finding that the stop was not unlawfully extended and that Knight-Walker consented to the search. After entering a conditional guilty plea to possession of controlled paraphernalia, Knight-Walker appealed. A divided Court of Appeals panel reversed, and the Supreme Court of Virginia reversed the Court of Appeals and entered final judgment for the Commonwealth.

DISPOSITION

reversed

REMAND INSTRUCTIONS

None. The court reversed the judgment of the Court of Appeals and entered final judgment for the Commonwealth.

CASES CITED

- Whren v. United States, 517 U.S. 806 (1996)
- McCain v. Commonwealth, 261 Va. 483 (2001)
- United States v. Hill, 852 F.3d 377 (4th Cir. 2017)
- Rodriguez v. United States, 575 U.S. 348 (2015)
- Arizona v. Johnson, 555 U.S. 323 (2009)
- United States v. Ross, 151 F.4th 487 (3d Cir. 2025)
- Maryland v. Wilson, 519 U.S. 408 (1997)
- Pennsylvania v. Mimms, 434 U.S. 106 (1977)
- Riley v. California, 573 U.S. 373 (2014)
- Brigham City v. Stuart, 547 U.S. 398 (2006)
- Graham v. Connor, 490 U.S. 386 (1989)
- Ryburn v. Huff, 565 U.S. 469 (2012)
- Gray v. Commonwealth, 233 Va. 313 (1987)
- Schneckloth v. Bustamonte, 412 U.S. 218 (1973)
- United States v. Santos, 161 F.4th 1007 (6th Cir. 2025)