

SUPERIOR COURT OF PENNSYLVANIA

Commonwealth v. Joyner

2025 Pa. Super. 251 · No. 644 EDA 2024 · Decided November 12, 2025

SUMMARY

The Pennsylvania Superior Court reversed an order suppressing a firearm and oxycodone-related evidence recovered after Terrance Joyner fled from police. The court held that the initial interaction was a mere encounter, that Joyner's flight occurred after police had reasonable suspicion to pursue him, and that the firearm was lawfully recovered during the flight.

CASE DETAILS

COURT	Superior Court of Pennsylvania
WRITING FOR THE COURT	Lazarus, P.J.; McLaughlin, J.; Sullivan, J.
JURISDICTION	Pennsylvania Superior Court
DECIDED	November 12, 2025
DOCKET	644 EDA 2024
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Interlocutory appeal by the Commonwealth under Pa.R.A.P. 311(d) from an order granting the defendant's motion to suppress physical evidence.
STANDARD OF REVIEW	The appellate court independently reviews the suppression court's legal conclusions de novo while accepting supported factual findings as binding. On a Commonwealth appeal from a suppression order, the court considers the defendant's evidence together with prosecution evidence that remains uncontradicted in the context of the entire record.
PRECEDENTIAL VALUE	Published and precedential Pennsylvania Superior Court opinion.
PARTIES	Commonwealth of Pennsylvania v. Terrance Joyner

TOPICS

suppression of evidence

search and seizure

fourth amendment

appellate procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the initial interaction between Officer Moore and Joyner was a mere encounter or an investigatory detention requiring reasonable suspicion.
2. Whether, when Joyner fled, the officers had reasonable suspicion to pursue and detain him.
3. Whether the firearm discarded during Joyner's flight was voluntarily abandoned and therefore lawfully recoverable, or was the product of a coercive and unlawful seizure.

HOLDINGS

1. The initial interaction was a mere encounter, not an investigatory detention, because the officers approached Joyner on a public street without activating lights or sirens, leaving the vehicle, brandishing weapons, or otherwise using a coercive show of authority.
2. When Joyner fled, the encounter escalated to an investigatory detention supported by reasonable suspicion.
3. The firearm was lawfully recovered because Joyner abandoned it during flight after the officers had reasonable suspicion to pursue and detain him.

KEY QUOTATIONS

“The interaction occurred in broad daylight on a public street.” (at 8)

“Once Officers Moore, Whatley, and Grant gave chase, the encounter escalated to an investigatory detention, which was supported by reasonable suspicion.” (at 11)

“Thus, the recovery of the firearm abandoned during the flight was lawful.” (at 12)

FACTUAL BACKGROUND

Police Officer Paul Moore observed Joyner walking in a Philadelphia area known for violent and firearm-related crime, with a heavily weighted, square-shaped object concealed near his right side. After seeing the marked police vehicle, Joyner changed direction. Moore asked whether Joyner had a gun; Joyner denied it, continued walking, and then fled when Moore opened the vehicle door. Officers pursued Joyner, who was arrested after a brief chase, and recovered a firearm and two oxycodone prescription bottles.

PROCEDURAL HISTORY

The Commonwealth charged Joyner with firearm and controlled-substance offenses. After a suppression hearing, the Philadelphia County Court of Common Pleas granted Joyner's motion to suppress, finding that police had conducted an investigatory detention without reasonable suspicion and that Joyner's firearm was forcibly abandoned. The Commonwealth appealed, and the Superior Court reversed and remanded.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Proceed with further proceedings consistent with the decision, including any unresolved issue concerning Joyner's Miranda rights. Jurisdiction was relinquished.

CASES CITED

- Commonwealth v. Coles, 317 A.3d 659, 663 (Pa. Super. 2024)
- Commonwealth v. Morrison, 166 A.3d 357, 363-64 (Pa. Super. 2017)
- Commonwealth v. Anderson, 276 A.3d 282, 293-94 (Pa. Super. 2022) (en banc)
- Commonwealth v. Adams, 205 A.3d 1195, 1199-1200 (Pa. 2019)
- Commonwealth v. Parker, 161 A.3d 357, 363 (Pa. Super. 2017)
- Commonwealth v. Young, 162 A.3d 524, 529 (Pa. Super. 2017)
- Commonwealth v. Coleman, 19 A.3d 1111, 1116 (Pa. Super. 2011)
- Commonwealth v. Hicks, 208 A.3d 916, 926-27, 934, 945, 951 (Pa. 2019)
- Commonwealth v. Thomas, 273 A.3d 1190, 1197 (Pa. Super. 2022)
- Commonwealth v. Young, 904 A.2d 947, 957 (Pa. Super. 2006)
- Commonwealth v. McCoy, 154 A.3d 813, 819 (Pa. Super. 2017)
- Commonwealth v. Matos, 672 A.2d 769, 774 (Pa. 1996)
- Commonwealth v. Cook, 735 A.2d 673, 675 (Pa. 1999)
- Commonwealth v. Barnett, 398 A.2d 1019, 1020-21 (Pa. 1979)
- Commonwealth v. Rice, 304 A.3d 1255, 1262-63 (Pa. Super. 2023)
- Commonwealth v. Taylor, 2025 Pa. Super. Unpub. LEXIS 1813 (Pa. Super. filed July 15, 2025)
- Commonwealth v. Lindsay, 328 A.3d 531 (Pa. Super. 2024) (Table)

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