

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

People v. Spruill

2026 NY Slip Op 01738 (N.Y. Ct. App. 2026) · No. Ind. No. 70861/21; Appeal No. 6183; Case No. 2024-00551
· Decided March 24, 2026

SUMMARY

The Appellate Division, First Department, unanimously affirmed Barron Spruill's conviction for second-degree murder and his sentence of 20 years to life as a second felony offender. The court held that the felony-murder verdict was supported by the weight of the evidence, the jury instruction regarding an accomplice did not constructively amend the indictment, and evidence of a prior threatening phone call was properly admitted to establish motive and intent.

CASE DETAILS

COURT	Supreme Court of the State of New York, Appellate Division, First Department
WRITING FOR THE COURT	Manzanet-Daniels, J.P.; Shulman, J.; Rodriguez, J.; Higgitt, J.; Rosado, J.
JURISDICTION	New York Supreme Court, Appellate Division, First Department
DECIDED	March 24, 2026
DOCKET	Ind. No. 70861/21; Appeal No. 6183; Case No. 2024-00551
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed from a judgment of the Supreme Court, Bronx County, entered after a jury trial, convicting him of murder in the second degree and sentencing him as a second felony offender to 20 years to life.
STANDARD OF REVIEW	The felony-murder determination was reviewed under the weight-of-the-evidence standard. The challenged evidentiary ruling and jury instruction were reviewed for legal error or abuse of discretion as applicable; the opinion found no reversible error.
PRECEDENTIAL VALUE	Published appellate opinion; precedential under New York law, subject to correction before publication in the Official Reports.
PARTIES	Barron Spruill v. The People of the State of New York

TOPICS

criminal procedure evidence appellate procedure sentencing

PRACTICE AREAS

criminal law criminal procedure evidence appellate practice

QUESTIONS PRESENTED

1. Whether the jury's finding that defendant or one of his accomplices caused the victim's death while robbing or attempting to rob him was supported by the weight of the evidence.
2. Whether instructing the jury that it could find defendant guilty of felony murder if another participant in the alleged robbery caused the victim's death impermissibly amended the indictment.
3. Whether testimony concerning defendant's prior threatening phone call was admissible for non-propensity purposes.
4. Whether defendant's sentence should be reduced.

HOLDINGS

1. The jury's determination that defendant or one of his accomplices caused the victim's death while robbing or attempting to rob him was supported by the weight of the evidence.
2. The instruction allowing the jury to find defendant guilty of felony murder if another participant in the alleged robbery caused the victim's death was not an impermissible constructive amendment of the indictment.
3. The testimony was properly admitted for the non-propensity purposes of proving motive and intent.
4. There was no basis for reducing defendant's sentence.

KEY QUOTATIONS

"The court's instruction that the jury could find defendant guilty of felony murder if it found that "another participant" in the alleged robbery caused the victim's death was not an impermissible constructive amendment of the indictment"

"The court's ruling permitting a witness to testify regarding a phone call, several months prior to the instant offense, in which defendant threatened that he was outside of the eventual shooting victim's apartment and had a gun, was properly admitted for the non-propensity purposes of proving motive and intent"

FACTUAL BACKGROUND

Defendant was convicted of second-degree murder under a felony-murder theory arising from a robbery or attempted robbery during which the victim was killed by defendant or an accomplice. The prosecution also presented testimony about a phone call several months before the offense in which defendant threatened that he was outside the eventual victim's apartment and had a gun. The court noted a longstanding dispute about money that ultimately prompted defendant to ambush and kill the victim.

PROCEDURAL HISTORY

The Supreme Court, Bronx County, rendered judgment on January 10, 2024, following a jury trial. On appeal, defendant challenged the weight of the evidence, the felony-murder jury instruction, admission of testimony concerning a prior threatening phone call, and his sentence. The Appellate Division unanimously affirmed.

DISPOSITION

affirmed

CASES CITED

- People v. Danielson, 9 NY3d 342, 348-349 (2007)
- People v. Baque, 43 NY3d 26 (2024)
- People v. Rivera, 84 NY2d 766, 769 (1995)
- People v. Molineux, 168 NY 264 (1901)
- People v. Cass, 18 NY3d 553, 560 (2012)

OPINION

PER CURIAM.

People v Spruill (2026 NY Slip Op 01738) People v Spruill 2026 NY Slip Op 01738 Decided on March 24, 2026 Appellate Division, First Department Published by New York State Law Reporting Bureau pursuant to Judiciary Law § 431. This opinion is uncorrected and subject to revision before publication in the Official Reports. Decided and Entered: March 24, 2026 Before: Manzanet-Daniels, J.P., Shulman, Rodriguez, Higgitt, Rosado, JJ. Ind. No. 70861/21|Appeal No. 6183|Case No. 2024-00551| [*1]The People of the State of New York, Respondent, v Barron Spruill, Appellant.

Jenay Nurse Guilford, Center for Appellate Litigation, New York (Daniel Hamburg of counsel), and Arnold & Porter Kaye Scholer LLP, New York (Maya Kouassi of counsel), for appellant. Darcel D. Clark, District Attorney, Bronx (Joshua P. Weiss of counsel), for respondent. Judgment, Supreme Court, Bronx County (Joseph A. McCormack, J.), rendered January 10, 2024, convicting defendant, after a jury trial, of murder in the second degree, and sentencing him, as a second felony offender, to a term of 20 years to life, unanimously affirmed.

The jury's determination that defendant or one of his accomplices caused the victim's death while robbing or attempting to rob him — as required to support his conviction of felony murder — was supported by the weight of the evidence (see People v Danielson, 9 NY3d 342, 348-349 [2007]; see also People v Baque, 43 NY3d 26 [2024]).

The court's instruction that the jury could find defendant guilty of felony murder if it found that "another participant" in the alleged robbery caused the victim's death was not an impermissible

constructive amendment of the indictment (see CPL 200.70[2]; *People v Rivera*, 84 NY2d 766, 769 [1995]).

The court's ruling permitting a witness to testify regarding a phone call, several months prior to the instant offense, in which defendant threatened that he was outside of the eventual shooting victim's apartment and had a gun, was properly admitted for the non-propensity purposes of proving motive and intent; there had been a longstanding dispute about money that ultimately prompted defendant to ambush and kill the victim (see *People v Molineux*, 168 NY 264 [1901]; see also *People v Cass*, 18 NY3d 553, 560 [2012]).

We perceive no basis for reducing defendant's sentence. THIS CONSTITUTES THE DECISION AND ORDER OF THE SUPREME COURT, APPELLATE DIVISION, FIRST DEPARTMENT.
ENTERED: March 24, 2026