

COURT OF CRIMINAL APPEALS OF TEXAS

State v. Christopher Tye Coleman

Coleman · No. PD-0093-25 & PD-0094-25 · Decided January 29, 2026

SUMMARY

The Texas Court of Criminal Appeals considers whether a cattle ranger committed impersonation of a public servant while questioning the appellee about an offense outside the ranger’s limited statutory authority. The court holds that the ranger did not commit that offense under the circumstances presented and concludes that the lack of statutory investigative authority alone did not establish standing for suppression under Article 38.23. The court reverses the judgment of the court of appeals.

CASE DETAILS

COURT	Court of Criminal Appeals of Texas
WRITING FOR THE COURT	Parker, J.; Schenck, P.J.; Yeary, J.; Keel, J.; Finley, J.; McClure, J.; Newell, J.; Richardson, J.; Walker, J.
JURISDICTION	Texas Court of Criminal Appeals
DECIDED	January 29, 2026
DOCKET	PD-0093-25 & PD-0094-25
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	The State petitioned for discretionary review of the Twelfth Court of Appeals' decision affirming an order granting Coleman's motion to suppress.
STANDARD OF REVIEW	Under the bifurcated Guzman standard, historical facts and application-of-law-to-fact questions turning on credibility and demeanor receive deference, while other application-of-law-to-fact questions are reviewed de novo. Conclusive electronic evidence may control over inconsistent factual findings. The Calloway rule permits affirmance on any theory of law applicable to the case, subject to its limits.
PRECEDENTIAL VALUE	Published precedential opinion
PARTIES	The State of Texas v. Christopher Tye Coleman

TOPICS

criminal procedure

suppression of evidence

statutory interpretation

appellate procedure

evidence

PRACTICE AREAS

criminal law

criminal procedure

evidence

appellate practice

QUESTIONS PRESENTED

1. Whether a cattle ranger who truthfully identifies himself as a cattle ranger but states that he is still a police officer impersonates a public servant under Texas Penal Code section 37.11 during a consensual interview.
2. Whether the lack of statutory authority to investigate an offense, standing alone, gives a defendant standing to invoke Texas Code of Criminal Procedure article 38.23.
3. Whether the court of appeals properly affirmed suppression under the impersonation theory.

HOLDINGS

1. A public servant does not impersonate a different public servant merely by accurately identifying his actual position and generically stating that he is a police officer. To impersonate a public servant, the actor must falsely represent himself to be the public servant he allegedly impersonated; the record did not establish that Jeter falsely represented himself as a Texas Ranger or another different public servant.
2. Conducting the interview did not violate Texas Penal Code section 37.11(a)(2) because the encounter was consensual and Jeter did not purport to exercise official authority by knocking on Coleman's door, asking to enter, and asking questions.
3. A defendant's showing that a law-enforcement officer lacked statutory authority to conduct an investigation is, standing alone, insufficient to establish the infringement of a legal right required to invoke article 38.23.

KEY QUOTATIONS

“Under those circumstances, did the cattle ranger commit the offense of impersonation of a public servant? We answer that question “no” and reverse the judgment of the court of appeals.” (1)

“However, if an officer or a private individual commits a crime of deception against the defendant that persuades him to confess, the defendant might have standing to assert that law violation.” (18)

“To “impersonate” a public servant, the actor must at least have falsely represented himself to be a public servant.” (22)

“Police officers are as free as any other citizen to knock on someone’s door and ask to talk with them.” (25)

“Because the encounter was consensual, Jeter did not purport to exercise any authority by knocking on Appellee’s door, asking to come in, and then asking Appellee questions.” (25-26)

FACTUAL BACKGROUND

Steven Jeter, a retired Texas Ranger employed as a cattle ranger by the Texas & Southwestern Cattle Raisers Association, contacted Coleman at his residence about allegations involving sexual communications and photographs exchanged with a minor. Jeter identified himself as a cattle ranger, described his prior work with the Texas Rangers and Sheriff's Department, and also stated that he was still a police officer. During a roughly forty-five-minute conversation that the trial court characterized as casual, consensual, and noncustodial, Coleman made incriminating statements and provided his telephone passcode. Jeter was not deputized by local law enforcement and the alleged offense did not involve livestock or related property.

PROCEDURAL HISTORY

Coleman moved to suppress statements obtained during an interview by Steven Jeter, a Texas & Southwestern Cattle Raisers Association cattle ranger, and related telephone evidence. The trial court granted suppression, concluding that Jeter's authority was limited to livestock and related property matters. The court of appeals affirmed, holding that Coleman had standing under Texas's exclusionary rule because Jeter could have impersonated a public servant and concluding that Jeter lacked authority to investigate the alleged offense. The Court of Criminal Appeals reversed the court of appeals and remanded for further proceedings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remanded to the court of appeals for further proceedings consistent with the opinion, including consideration of whether another proper basis for standing or suppression exists.

CASES CITED

- Sandoval v. State, 665 S.W.3d 496, 515 (Tex. Crim. App. 2022)
- Guzman v. State, 955 S.W.2d 85, 89 (Tex. Crim. App. 1997)
- State v. Lujan, 634 S.W.3d 862, 865 (Tex. Crim. App. 2021)
- Monjaras v. State, 664 S.W.3d 921, 926 (Tex. Crim. App. 2022)
- Miller v. State, 393 S.W.3d 255, 263 (Tex. Crim. App. 2012)
- Carmouche v. State, 10 S.W.3d 323, 332 (Tex. Crim. App. 2000)
- State v. Castanedanieto, 607 S.W.3d 315, 327 (Tex. Crim. App. 2020)
- State v. Copeland, 501 S.W.3d 610, 613-14 (Tex. Crim. App. 2016)
- State v. Ruiz, 577 S.W.3d 543, 547 (Tex. Crim. App. 2019)
- Chavez v. State, 9 S.W.3d 817, 818-20 (Tex. Crim. App. 2000)
- Wilson v. State, 311 S.W.3d 452, 454, 459-60 (Tex. Crim. App. 2010)
- Continental Heritage Insurance Co. v. State, 683 S.W.3d 407, 411 (Tex. Crim. App. 2024)
- Boykin v. State, 818 S.W.2d 782, 785 (Tex. Crim. App. 1991)
- Milton v. State, 721 S.W.3d 300, 303 (Tex. Crim. App. 2025)

- Ex parte Reeder, 691 S.W.3d 628, 632 (Tex. Crim. App. 2024)
- State v. Garcia-Cantu, 253 S.W.3d 236, 243 (Tex. Crim. App.)
- State v. Woodard, 341 S.W.3d 404, 411 (Tex. Crim. App.)
- Trimble v. State, 132 Tex. Crim. 236, 241 (1937)
- Ringer v. State, 33 Tex. Crim. 180, 180, 183 (1894)
- Kerns v. First State Bank of Ben. Wheeler, 667 B.R. 539, 544 & n.3 (E.D. Tex., Tyler Div. 2024)

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