

DELAWARE COURT OF COMMON PLEAS FOR NEW CASTLE COUNTY

State of Delaware v. McKenzie S. Beasley

No. C.A. No. 2508011921, Delaware Court of Common Pleas for New Castle County (June 16, 2026)

SUMMARY

The Delaware Court of Common Pleas granted McKenzie S. Beasley’s motion to suppress evidence in a DUI case. The court held that a concerned-citizen report of erratic driving supplied reasonable articulable suspicion for an investigative stop, but that suspicion did not justify the officer’s warrantless, nonconsensual entry into Beasley’s garage and subsequent seizure. The State failed to establish probable cause or exigent circumstances sufficient to overcome the warrant requirement, so evidence obtained after the entry was suppressed.

CASE DETAILS

COURT	Delaware Court of Common Pleas for New Castle County
WRITING FOR THE COURT	Bradley V. Blanning
JURISDICTION	Delaware Court of Common Pleas, New Castle County
DECIDED	June 16, 2026
DOCKET	C.A. No. 2508011921
DISPOSITION	other
PROCEDURAL POSTURE	Defendant's motion to suppress evidence in a DUI prosecution based on an alleged unlawful warrantless entry into her garage and subsequent seizure and arrest.
STANDARD OF REVIEW	On a motion to suppress evidence obtained without a warrant, the State bears the burden of proving by a preponderance of the evidence that the search or seizure did not violate the defendant's rights under the Delaware Constitution, the United States Constitution, or Delaware statutory law.
PRECEDENTIAL VALUE	Published opinion of the Delaware Court of Common Pleas; binding effect beyond the case is not otherwise specified in the document.
PARTIES	State of Delaware

TOPICS

- suppression of evidence
- fourth amendment
- search and seizure
- warrant requirement
- probable cause

PRACTICE AREAS

criminal procedure

constitutional criminal procedure

DUI

QUESTIONS PRESENTED

1. Whether the concerned citizen's report of erratic driving, together with the vehicle description and registration information, supplied reasonable articulable suspicion for an investigative stop.
2. Whether the officer's warrantless, nonconsensual entry into Beasley's garage and subsequent seizure and arrest were justified by probable cause or an exigent circumstance.
3. Whether the dissipation of alcohol in a suspect's blood, hot pursuit, or prevention of escape justified the warrantless entry into the home under the circumstances.

HOLDINGS

1. The detailed report of erratic driving, including the vehicle's description, license tag, location, direction of travel, and the caller's identifying information, was sufficiently reliable to provide reasonable articulable suspicion for an investigative stop.
2. The officer's nonconsensual warrantless entry into Beasley's garage and subsequent seizure and arrest were unlawful because the State failed to establish probable cause to arrest or an exigent circumstance justifying entry into the home.
3. The asserted exigencies did not justify the warrantless entry because the record did not establish imminent destruction of evidence, hot pursuit, a genuine risk of escape, or other circumstances making a warrant impracticable.

KEY QUOTATIONS

"The Fourth Amendment has drawn a firm line at the entrance to the house. Absent exigent circumstances, that threshold may not reasonably be crossed without a warrant." (7)

"But when the officer has time to get a warrant, he must do so—even though the misdemeanor fled." (10)

"When Cpl. Velez chose to enter Ms. Beasley's garage, he was required to either have a warrant or probable cause to believe that she committed an offense." (13)

"As discussed above, the failure by law enforcement to secure a warrant when they had sufficient time to do so mandates a finding that the search and seizure was unlawful." (14)

FACTUAL BACKGROUND

A concerned citizen reported that a dark-colored Hyundai Sorento bearing Delaware temporary tag XQ66894 was swerving erratically and driving on the wrong side of the road. Corporal Emmanuel Velez confirmed the registration and went to Beasley's nearby home, where he found the vehicle in the open garage with its taillights illuminated and encountered Beasley exiting the driver's door. After Beasley repeatedly refused his requests to come outside and stated that she was in her home, Velez entered the garage, grabbed her arm, pulled her onto the driveway, and told her she was not free to leave. Velez later conducted a DUI investigation and arrested her.

PROCEDURAL HISTORY

The State charged McKenzie S. Beasley with driving under the influence and failure to remain within a single lane. Beasley moved to suppress evidence under Court of Common Pleas Criminal Rules 12(b) and 41(f). After a March 18, 2026 suppression hearing at which the arresting officer testified and body-worn-camera footage was reviewed, the court permitted supplemental briefing and granted the motion to suppress.

DISPOSITION

other

CASES CITED

- State v. Kent, 2022 WL 5419653 (Del. Super. Ct. Oct. 7, 2022), aff'd, 304 A.3d 951 (Del. 2023)
- State v. Kang, 2001 WL 1729126 (Del. Super. Nov. 30, 2001)
- Bloomingdale v. State, 842 A.2d 1212 (Del. 2004)
- Diggs v. State, 257 A.3d 993, 1003 (Del. 2021)
- Payton v. New York, 445 U.S. 573, 589 (1979)
- State v. Foreman, 2019 WL 4125596 (Del. Super. Ct. 2019)
- State v. Palmer, 2016 WL 3044499 (Del. Super. Ct. 2016)
- Coolidge v. New Hampshire, 403 U.S. 443, 474-75 (1971)
- State v. Keith, 2010 WL 8250816 (Del. Super. July 30, 2010)
- State v. Wilson, 2001 WL 845749 (Del. Super. Ct. July 6, 2001)
- Lange v. California, 594 U.S. 295 (2021)
- Caniglia v. Strom, 593 U.S. 194 (2021)
- State v. Greer, 2007 WL 442228 (Del. C.P. 2007)
- Robinson v. State, 600 A.2d 356, 364 (Del. 1991)
- Frisby v. Schultz, 487 U.S. 474, 484 (1988)
- Swanson v. State, 351 A.3d 496, 510 (Del. 2025)
- Purnell v. State, 832 A.2d 714, 719 (Del. 2003)
- Register v. State, 337 A.3d 1224, 1234 (Del. 2024)