

COURT OF APPEALS OF MISSISSIPPI

Ray Charles Lenoir a/k/a Ray Lenoir a/k/a Kool Ray v. State of Mississippi

No. 2024-KA-01342-COA (Miss. Ct. App. June 2, 2026) · No. No. 2024-KA-01342-COA · Decided June 2, 2026

SUMMARY

The Mississippi Court of Appeals affirmed Ray Charles Lenoir's convictions for trafficking methamphetamine and possessing cocaine. The court rejected challenges to the search warrant, the absence of a constructive-possession jury instruction, the sufficiency and weight of the evidence, the trafficking indictment, and the amendment of the sentence for the cocaine conviction. The court held that probable cause supported the warrant or, alternatively, that the good-faith exception applied, and that the evidence established constructive possession.

CASE DETAILS

COURT	Court of Appeals of Mississippi
WRITING FOR THE COURT	Carlton, P.J.; Barnes, C.J.; Wilson, P.J.; Westbrook, J.; McDonald, J.; Lawrence, J.; McCarty, J.; Lassitter St. Pé, J.; Emfinger, J.; Weddle, J.
JURISDICTION	Mississippi Court of Appeals
DECIDED	June 2, 2026
DOCKET	No. 2024-KA-01342-COA
DISPOSITION	affirmed
PROCEDURAL POSTURE	Lenoir appealed his felony convictions and consecutive sentences for trafficking methamphetamine and possessing cocaine after the Monroe County Circuit Court denied his motion for a judgment notwithstanding the verdict or a new trial.
STANDARD OF REVIEW	The court reviewed the probable-cause determination under the substantial-basis and totality-of-the-circumstances standards; denial of jury instructions for abuse of discretion, reading the instructions as a whole; sufficiency of the evidence de novo; denial of a new trial on weight-of-the-evidence grounds for abuse of discretion; and procedural plain-error claims under the plain-error standard.
PRECEDENTIAL VALUE	Published Mississippi Court of Appeals opinion

PARTIES

Ray Charles Lenoir a/k/a Ray Lenoir a/k/a Kool Ray v. State of Mississippi

TOPICS

suppression of evidence

probable cause

search and seizure

warrant requirement

double jeopardy

PRACTICE AREAS

criminal law

criminal procedure

constitutional criminal procedure

appellate procedure

QUESTIONS PRESENTED

1. Whether the search warrant was supported by probable cause and whether the trial court erred by denying suppression of the drugs and other evidence.
2. Whether the trial court plainly erred by failing to give a separate constructive-possession jury instruction.
3. Whether the evidence was legally sufficient to prove Lenoir constructively possessed the controlled substances.
4. Whether the jury's verdicts were against the overwhelming weight of the evidence.
5. Whether Count I of the indictment adequately charged trafficking methamphetamine.
6. Whether the trial court's amendment of Lenoir's Count II sentence during the same term of court violated double jeopardy.

HOLDINGS

1. The search warrant was supported by probable cause because the affidavit described a controlled purchase of methamphetamine from Lenoir at the residence, giving the issuing judge a substantial basis to find a fair probability that contraband would be found there. The denial of the motion to suppress was proper; alternatively, the good-faith exception would prevent application of the exclusionary rule.
2. The trial court did not commit reversible or plain error by failing to give a separate constructive-possession instruction because the jury was instructed on the essential elements of possession—knowledge and possession—and the manner of possession, actual or constructive, is not itself an essential element under the statute.
3. The evidence was sufficient for a rational jury to find beyond a reasonable doubt that Lenoir constructively possessed the methamphetamine and cocaine.
4. The verdicts were not against the overwhelming weight of the evidence, and the trial court did not abuse its discretion by denying a new trial.
5. Count I adequately charged trafficking methamphetamine because it identified the applicable statutory provisions, the Schedule II controlled substance, and the quantity of thirty grams or more.
6. The amendment of Lenoir's Count II sentence to add five years of post-release supervision did not violate double jeopardy because the circuit court amended the sentence during the same term of court

and acted within its inherent authority to alter the sentence before the term expired.

KEY QUOTATIONS

“The task of the issuing magistrate is simply to make a practical, common-sense decision whether, given all the circumstances set forth in the affidavit before him, including the “veracity” and “basis of knowledge” of persons supplying hearsay information, there is a fair probability that contraband or evidence of a crime will be found in a particular place.” (¶20)

“The way in which a defendant “possesses” a particular controlled substance is not an essential element of the crime.” (¶30)

“Accordingly, it did not constitute double jeopardy.” (¶52)

FACTUAL BACKGROUND

Law enforcement investigated and surveilled a residence at 603 Clayton Street in Aberdeen, Mississippi, where Lenoir lived with his brother. Based on a controlled purchase arranged by narcotics agents, a justice court judge issued a search warrant. During the search, agents found methamphetamine, powder cocaine, and crack cocaine in the bedroom Lenoir identified as his, along with documents, mail, and a prescription bottle bearing his name. Lenoir gave a statement acknowledging that drugs had been found at the residence.

PROCEDURAL HISTORY

A Monroe County grand jury indicted Lenoir for trafficking methamphetamine and possessing cocaine. Following a jury trial on October 8, 2024, the circuit court entered convictions and sentenced Lenoir to forty years for trafficking and twenty years suspended for possession, to run consecutively. The court amended the possession sentence the next day to include five years of post-release supervision. After denial of post-trial relief, Lenoir appealed, raising issues through appointed counsel and a pro se brief.

DISPOSITION

affirmed

CASES CITED

- Whittaker v. State, 269 So. 3d 1226 (Miss. Ct. App. 2018)
- Sutton v. State, 238 So. 3d 1150 (Miss. 2018)
- Jackson v. State, No. 2023-KA-01280-COA, 2025 WL 2046994 (Miss. Ct. App. July 22, 2025)
- Manning v. State, 726 So. 2d 1152 (Miss. 1998)
- Weatherspoon v. State, 732 So. 2d 158 (Miss. 1999)
- Illinois v. Gates, 462 U.S. 213 (1983)
- Jones v. United States, 362 U.S. 257 (1960)
- United States v. Salvucci, 448 U.S. 83 (1980)
- State v. Woods, 866 So. 2d 422 (Miss. 2003)

- Roach v. State, 7 So. 3d 911 (Miss. 2009)
- Holloway v. State, 282 So. 3d 537 (Miss. Ct. App. 2019)
- White v. State, 842 So. 2d 565 (Miss. 2003)
- Newell v. State, 49 So. 3d 66 (Miss. 2010)
- Baxter v. State, 177 So. 3d 394 (Miss. 2015)
- Harrell v. State, 134 So. 3d 266 (Miss. 2014)
- Sills v. State, 359 So. 3d 603 (Miss. 2023)
- Guss v. State, 296 So. 3d 734 (Miss. Ct. App. 2020)
- Terry v. State, 324 So. 3d 753 (Miss. 2021)
- Leopard v. State, 394 So. 3d 1061 (Miss. Ct. App. 2024)
- Jones v. State, 411 So. 3d 265 (Miss. Ct. App. 2025)
- Billups v. State, 270 So. 3d 917 (Miss. 2018)
- Dewberry v. State, 407 So. 3d 269 (Miss. Ct. App. 2025)
- Brady v. State, 337 So. 3d 218 (Miss. 2022)
- Spiers v. State, 361 So. 3d 643 (Miss. 2023)
- Sheely v. State, 391 So. 3d 186 (Miss. 2024)
- Burrows v. State, 961 So. 2d 701 (Miss. 2007)
- Collins v. State, 422 So. 3d 61 (Miss. Ct. App. 2025)
- Pegues v. State, 426 So. 3d 1078 (Miss. 2026)
- Hopkins v. State, 141 So. 3d 384 (Miss. 2014)
- Mitchell v. State, 403 So. 3d 110 (Miss. Ct. App. 2025)
- Dille v. State, 334 So. 3d 1162 (Miss. Ct. App. 2021)
- Jordan v. State, 211 So. 3d 713 (Miss. 2016)
- Ales v. State, 921 So. 2d 1284 (Miss. Ct. App. 2006)
- Leverette v. State, 812 So. 2d 241 (Miss. Ct. App. 2002)
- Mississippi Commission on Judicial Performance v. Russell, 691 So. 2d 929 (Miss. 1997)
- Ethridge v. State, 800 So. 2d 1221 (Miss. Ct. App. 2001)
- Dunlap v. State, 70 So. 3d 1140 (Miss. Ct. App. 2011)