

COURT OF APPEALS OF NORTH CAROLINA

State v. White

No. COA 25-470 (N.C. Ct. App. Jan. 7, 2026) · No. COA 25-470 · Decided January 7, 2026

SUMMARY

The North Carolina Court of Appeals affirmed the denial of Chadiez White’s motions to suppress evidence obtained after a vehicle checkpoint and subsequent search. The court held that the checkpoint had a valid primary purpose of detecting motor-vehicle-code violations, complied with applicable statutory and constitutional requirements, and was reasonable. The court also upheld the trial court’s findings concerning the marijuana odor, White’s admissions, and probable cause for the vehicle search.

CASE DETAILS

COURT	Court of Appeals of North Carolina
WRITING FOR THE COURT	Judge Tom Murry; Judge Murry; Judge Collins; Judge Flood
JURISDICTION	North Carolina Court of Appeals
DECIDED	January 7, 2026
DOCKET	COA 25-470
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed from the denial of two motions to suppress following a conditional guilty plea to possession of a firearm by a felon.
STANDARD OF REVIEW	The Court reviews whether the trial court’s findings of fact are supported by competent evidence and, if so, whether those findings support its conclusions of law. Unchallenged findings are binding on appeal, and conclusions of law are reviewed de novo.
PRECEDENTIAL VALUE	published
PARTIES	Chadiez White v. State of North Carolina

TOPICS

- criminal procedure
- fourth amendment
- search and seizure
- probable cause
- suppression of evidence

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether competent evidence supported the trial court's challenged findings of fact concerning the checkpoint, White's statements, and the SBI memorandum.
2. Whether the checkpoint served a lawful primary programmatic purpose and was reasonable under the Fourth Amendment and North Carolina law.
3. Whether the odor and sight of what the officer reasonably believed to be marijuana, despite the legalization of industrial hemp, established probable cause to search White's vehicle under the automobile exception.
4. Whether the trial court properly denied White's motions to suppress.

HOLDINGS

1. The trial court's challenged findings of fact were supported by competent evidence and were binding on appeal.
2. The checkpoint was constitutional because it had a lawful primary programmatic purpose of detecting Chapter 20 motor-vehicle violations and was reasonable under the totality of the circumstances.
3. The officer had probable cause to search the vehicle based on the strong odor of burnt marijuana and his observation of a partially smoked joint that he reasonably believed was marijuana.

KEY QUOTATIONS

"The trial court must "examine the available evidence to determine the primary purpose of the checkpoint program." (at 16–17)

"the legalization of industrial hemp did not eliminate the significance of detecting 'the odor of marijuana' for the purposes of a motion to suppress." (at 24)

"Probable cause did not require [an officer's] belief that the substance was illegal marijuana [to] be "correct or more likely true than false," but requires only a " 'practical, nontechnical' probability that incriminating evidence involved is all that is required." (at 25)

FACTUAL BACKGROUND

Captain Michael Seago organized a checkpoint on South Old Stage Road in Robeson County to detect violations of North Carolina motor-vehicle laws. The checkpoint operated under a written GHSP template and authorization form, stopped every vehicle, and was approved in advance by the police chief. When White was stopped, Seago smelled burnt marijuana, White produced a partially smoked joint, and White later admitted that he possessed a firearm and was a convicted felon. Officers searched the vehicle and found an assault rifle and suspected marijuana.

PROCEDURAL HISTORY

A Robeson County grand jury indicted White for possession of a firearm by a felon. The Superior Court denied his motions to suppress evidence based on an allegedly unconstitutional checkpoint and lack of probable cause to search his vehicle. White entered a conditional guilty plea, preserving appellate review under N.C.G.S. § 15A-979(b), and received an active sentence of 12 to 24 months. The Court of Appeals affirmed and found no error.

DISPOSITION

affirmed

CASES CITED

- State v. Reynolds, 298 N.C. 380, 395, 397 (1979)
- State v. Parker, 277 N.C. App. 531, 538–39 (2021)
- State v. Cooke, 306 N.C. 132, 134 (1982)
- State v. Ashworth, 248 N.C. App. 649, 651 (2016)
- State v. Baker, 312 N.C. 34, 37 (1984)
- State v. Buchanan, 353 N.C. 332, 336 (2001)
- State v. Rollins, 226 N.C. App. 129, 144 (2013)
- State v. Williams, 362 N.C. 628, 632–33 (2008)
- State v. Biber, 365 N.C. 162, 168 (2011)
- State v. Fields, 268 N.C. App. 561, 568 (2019)
- State v. Veazey, 201 N.C. App. 398, 402 (2009)
- State v. Cobb, 381 N.C. 161, 165, 168 (2022)
- State v. Little, 295 N.C. App. 541, 555 (2024)
- State v. Rowdy, 296 N.C. App. 272, 279 (2024)
- State v. Byrd, 287 N.C. App. 276, 279 (2022)
- State v. Mitchell, 358 N.C. 63, 66 (2004)
- State v. Veazey, 191 N.C. App. 181, 186–93 (2008)
- Illinois v. Lidster, 540 U.S. 419, 426 (2004)
- City of Indianapolis v. Edmond, 531 U.S. 32, 37, 41–43, 46–48 (2000)
- Terry v. Ohio, 392 U.S. 1, 20–21 (1968)
- State v. Rose, 170 N.C. App. 284, 289 (2005)
- Delaware v. Prouse, 440 U.S. 648, 663 (1979)
- State v. Burroughs, 185 N.C. App. 496, 502 (2007)
- Brown v. Texas, 443 U.S. 47, 50–51 (1979)
- Coolidge v. New Hampshire, 403 U.S. 443, 454–55 (1971)
- Katz v. United States, 389 U.S. 347, 357 (1967)
- State v. Isleib, 319 N.C. 634, 637–38 (1987)
- State v. Springs, 292 N.C. App. 207, 212–14 (2023)

- State v. Downing, 169 N.C. App. 790, 795–96 (2005)
- State v. Dobson, 293 N.C. App. 450, 454 (2024)
- State v. Johnson, 288 N.C. App. 441, 457–58 (2023)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/state/north-carolina-court-of-appeals-court-of-appeals-of-north-carolina/2026/state-v-white-kzs6doo0>