

SUPREME COURT OF THE STATE OF NEW YORK, APPELLATE DIVISION,
FOURTH JUDICIAL DEPARTMENT

People v. Young

2025 NY Slip Op 06452 · No. 800 KA 22-01214 · Decided November 21, 2025

SUMMARY

The New York Appellate Division, Fourth Department holds the appeal and remits the matter to County Court for further proceedings concerning the defendant's motion challenging the People's certificate of compliance and speedy-trial readiness. The court rejects challenges to the admission of evidence, legal sufficiency, weight of the evidence, and sentence severity, but concludes that County Court applied the wrong standard by focusing on prejudice rather than due diligence in evaluating discovery compliance. Two judges dissent, concluding that the evidence was legally insufficient to establish the required three-month course of sexual conduct and would reverse and dismiss the indictment.

CASE DETAILS

COURT	Supreme Court of the State of New York, Appellate Division, Fourth Judicial Department
WRITING FOR THE COURT	Montour, J.P.; Smith, J.; Greenwood, J.; Nowak, J.; Keane, J.
JURISDICTION	New York Supreme Court, Appellate Division, Fourth Department
DECIDED	November 21, 2025
DOCKET	800 KA 22-01214
DISPOSITION	remanded
PROCEDURAL POSTURE	Defendant appealed from a Monroe County Court judgment convicting him, after a jury trial, of predatory sexual assault against a child.
STANDARD OF REVIEW	Legal sufficiency is reviewed by viewing the evidence in the light most favorable to the People and determining whether there is a valid line of reasoning and permissible inferences from which a rational jury could find every element proved beyond a reasonable doubt. Weight-of-the-evidence review considers the evidence in light of the elements charged, while credibility determinations are accorded deference. The propriety of a certificate of compliance under the discovery statute turns on whether the prosecution exercised due diligence and made

	reasonable inquiries, not merely whether it acted in good faith or whether the defendant was prejudiced.
PRECEDENTIAL VALUE	Published intermediate appellate decision; binding on lower courts within the Fourth Department subject to higher-court review.
PARTIES	James Young v. The People of the State of New York

TOPICS

criminal procedure speedy trial discovery criminal evidence standard of review

PRACTICE AREAS

Criminal law Criminal procedure Evidence Appellate procedure

QUESTIONS PRESENTED

1. Whether testimony that defendant directed his girlfriend to sexually abuse the child and demanded photographs and videos of that abuse was inadmissible Molineux evidence.
2. Whether the evidence was legally sufficient to establish that defendant committed the charged sexual conduct over a period of at least three months.
3. Whether the verdict was against the weight of the evidence.
4. Whether defendant's sentence was unduly harsh or severe.
5. Whether the People's failure to disclose voluminous social-media records rendered their certificate of compliance improper and their statement of trial readiness illusory for purposes of statutory speedy-trial requirements.

HOLDINGS

1. The testimony was not Molineux evidence because it was relevant to the same crime for which defendant was on trial. Alternatively, even if treated as Molineux evidence, it was admissible to complete the narrative and provide necessary background, and its probative value outweighed its potential prejudicial effect.
2. The evidence was legally sufficient for a rational jury to find that defendant's sexual conduct began in June or July 2019 and continued until mid-April 2020, satisfying the statutory three-month duration requirement.
3. The verdict was not against the weight of the evidence.
4. County Court applied the wrong standard in evaluating defendant's speedy-trial motion. The relevant inquiry is whether the People exercised due diligence and made reasonable inquiries to ascertain the existence of discoverable material; good faith and lack of prejudice, standing alone, do not establish a proper certificate of compliance.

KEY QUOTATIONS

*“the probative value of the evidence outweigh[ed] the potential for prejudice to . . . defendant” (*1)*

*“there is a valid line of reasoning and permissible inferences from which a rational jury could have found the elements of the crime proved beyond a reasonable doubt” (*2)*

*“the key question in determining if a proper [certificate of compliance] has been filed is whether the prosecution has ‘exercis[ed] due diligence and ma[de] reasonable inquiries to ascertain the existence of material and information subject to discovery’” (*3)*

FACTUAL BACKGROUND

Defendant was convicted of predatory sexual assault against a child based on allegations that he repeatedly sexually abused his girlfriend's daughter, who was nine and ten years old during the charged period. The girlfriend testified that, at defendant's direction, she also sexually abused the child and sent defendant photographs and videos of that abuse at his demand. The child testified that defendant sexually abused her repeatedly, including intercourse, and that the last incident occurred a few days before his arrest in April 2020. The prosecution's discovery included voluminous social-media records obtained by federal prosecutors under a search warrant in a related federal case, which the People did not timely disclose.

PROCEDURAL HISTORY

Monroe County Court denied defendant's motion to dismiss the indictment on statutory speedy-trial grounds, concluding that the People's discovery violation was cured by preclusion of the undisclosed social-media records and that the People had acted in good faith. The Appellate Division rejected defendant's evidentiary, legal-sufficiency, weight-of-the-evidence, and sentencing arguments, but held that County Court applied the wrong standard in evaluating the speedy-trial motion. The court reserved decision and remitted the matter to County Court for further submissions and a determination whether the People exercised due diligence in filing a proper certificate of compliance.

DISPOSITION

remanded

REMAND INSTRUCTIONS

The matter is remitted to Monroe County Court to determine defendant's statutory speedy-trial motion after further submissions, if warranted, applying the due-diligence standard and considering whether the People made reasonable inquiries to ascertain the existence of material subject to discovery.

CASES CITED

- People v. Molineux, 168 N.Y. 264 (1901)
- People v. Frumusa, 29 N.Y.3d 364 (2017)
- People v. Hymes, 174 A.D.3d 1295 (4th Dep't 2019), aff'd, 34 N.Y.3d 1178 (2020)
- People v. Perkins, 196 A.D.3d 1107 (4th Dep't 2021), lv. denied, 37 N.Y.3d 1028 (2021)
- People v. Morris, 21 N.Y.3d 588 (2013)

- People v. Hu Sin, 2025 NY Slip Op 03100
- People v. Leonard, 29 N.Y.3d 1 (2017)
- People v. Danielson, 9 N.Y.3d 342 (2007)
- People v. Kancharla, 23 N.Y.3d 294 (2014)
- People v. Li, 34 N.Y.3d 357 (2019)
- People v. Allen, 36 N.Y.3d 1033 (2021)
- People v. Gordon, 23 N.Y.3d 643 (2014)
- People v. Hampton, 21 N.Y.3d 277 (2013)
- People v. Paramore, 288 A.D.2d 53 (1st Dep't 2001), lv. denied, 97 N.Y.2d 759 (2002)
- People v. Brown, 194 A.D.3d 1398 (4th Dep't 2021), lv. denied, 37 N.Y.3d 970 (2021)
- People v. Judkins, 41 A.D.3d 1046 (3d Dep't 2007), lv. denied, 9 N.Y.3d 962 (2007)
- People v. Raymo, 19 A.D.3d 727 (3d Dep't 2005), lv. denied, 5 N.Y.3d 793 (2005)
- People v. Bleakley, 69 N.Y.2d 490 (1987)
- People v. Arnold, 107 A.D.3d 1526 (4th Dep't 2013), lv. denied, 22 N.Y.3d 953 (2013)
- People v. Gaskin, 214 A.D.3d 1353 (4th Dep't 2023)
- People v. Bay, 41 N.Y.3d 200 (2023)
- People v. Cooperman, 225 A.D.3d 1216 (4th Dep't 2024)
- People v. Sumler, 228 A.D.3d 1350 (4th Dep't 2024)
- People v. Walker, 232 A.D.3d 1214 (4th Dep't 2024), lv. denied, 42 N.Y.3d 1082 (2025)
- People v. Baker, 229 A.D.3d 1324 (4th Dep't 2024)
- People v. Garrett, 23 N.Y.3d 878 (2014), rearg. denied, 25 N.Y.3d 1215 (2015)
- People v. Guerrero, 235 A.D.3d 1276 (4th Dep't 2025)
- People v. Pitts, 206 A.D.3d 1582 (4th Dep't 2022), lv. denied, 38 N.Y.3d 1135 (2022)