

SUPREME COURT OF ARKANSAS

Christopher Coy Gamble v. State of Arkansas

Gamble, 2026 Ark. 44 (Ark. 2026) · No. CR-24-690 · Decided March 5, 2026

SUMMARY

The Arkansas Supreme Court affirmed Christopher Coy Gamble’s convictions for capital murder and aggravated residential burglary. The court held that his custodial statement was not subject to suppression based on a pretextual arrest, overruled State v. Sullivan, and concluded that the arrest was permissible because officers had probable cause to believe Gamble possessed drug paraphernalia. The court also held that the circuit court did not abuse its discretion by refusing to strike the venire after a prospective juror stated that Gamble was guilty.

CASE DETAILS

COURT	Supreme Court of Arkansas
WRITING FOR THE COURT	Barbara W. Webb, Justice
JURISDICTION	Supreme Court of Arkansas
DECIDED	March 5, 2026
DOCKET	CR-24-690
DISPOSITION	affirmed
PROCEDURAL POSTURE	Gamble appealed his convictions for capital murder and aggravated residential burglary, challenging the denial of his motion to suppress a custodial statement and the denial of his motion to strike the venire panel.
STANDARD OF REVIEW	Denial of a motion to suppress is reviewed de novo based on the totality of the circumstances, and the ruling is reversed only if clearly against the preponderance of the evidence. A trial court's refusal to quash a jury panel is reviewed for abuse of discretion; an irregularity warrants a new trial only upon timely objection and a showing of resulting prejudice.
PRECEDENTIAL VALUE	Published, precedential decision of the Supreme Court of Arkansas
PARTIES	Christopher Coy Gamble v. State of Arkansas

TOPICS

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search and seizure

suppression of evidence

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether Gamble's custodial statement was obtained as the product of an unlawful pretextual arrest and therefore should have been suppressed.
2. Whether the Supreme Court of Arkansas should overrule *State v. Sullivan*, 348 Ark. 647, 74 S.W.3d 215 (2002), which treated pretextual arrests as unreasonable under the Arkansas Constitution.
3. Whether the circuit court abused its discretion by refusing to strike the entire venire after a venire member stated that Gamble was guilty.

HOLDINGS

1. *State v. Sullivan*, 348 Ark. 647, 74 S.W.3d 215 (2002), is overruled. An arrest supported by probable cause for a lesser offense is not unreasonable merely because police are subjectively motivated to investigate a more serious offense; the officer's subjective intent is irrelevant when probable cause exists.
2. The circuit court properly denied Gamble's motion to suppress because his arrest was supported by probable cause that he possessed drug paraphernalia in Officer Smith's presence, notwithstanding the officers' interest in investigating the murder.
3. The circuit court did not abuse its discretion by refusing to strike the entire venire because the offending venire member was excused for cause and the court gave a comprehensive admonition directing the remaining venire to disregard her opinion and decide the case based only on the evidence and law.

KEY QUOTATIONS

"It is not unreasonable to arrest someone for a lesser crime (when there is probable cause for that arrest) if the real motivation of the police is to investigate a more serious crime." (at 11)

"The officer's subjective intent for making the arrest is irrelevant if there is probable cause for that arrest." (at 11)

"Gamble's possession of drug paraphernalia was an offense that was committed in Officer Smith's presence." (at 12)

FACTUAL BACKGROUND

Police investigating Van Stevens's murder focused on Gamble based on his proximity to the crime and evidence connecting him to items later found in a neighbor's burn pile. On August 18, 2020, police encountered Gamble at a hotel, searched him under an asserted parole search waiver, and took him to police headquarters after he agreed to an interview. After receiving and waiving Miranda rights, Gamble admitted that he had been inside Stevens's residence and typically carried a knife; police later detained and arrested him for murder. During voir dire, a

venire member stated that she thought Gamble was guilty, but the circuit court excused her and admonished the remaining venire to disregard the statement.

PROCEDURAL HISTORY

A White County jury convicted Gamble of capital murder by premeditation and deliberation and aggravated residential burglary. The White County Circuit Court sentenced him to life imprisonment and a concurrent sixty-year sentence. The circuit court denied Gamble's suppression motion without findings and later denied his motion to strike the venire panel. The Supreme Court of Arkansas affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Sullivan, 348 Ark. 647, 74 S.W.3d 215 (2002)
- State v. Sullivan, 340 Ark. 315, 11 S.W.3d 526 (2000)
- State v. Sullivan, 340 Ark. 318-A, 16 S.W.3d 551 (2000)
- Arkansas v. Sullivan, 532 U.S. 769 (2001)
- Whren v. United States, 517 U.S. 806 (1996)
- United States v. Lefkowitz, 285 U.S. 452, 467 (1932)
- Nieves v. Bartlett, 587 U.S. 391, 403 (2019)
- Devenpeck v. Alford, 543 U.S. 146, 154 (2004)
- Kamen v. Kemper Fin. Servs., Inc., 500 U.S. 90, 99 (1991)
- Erie R.R. v. Tompkins, 304 U.S. 64 (1938)
- Mapp v. Ohio, 367 U.S. 643 (1961)
- Washington v. Davis, 426 U.S. 229, 238 (1976)
- Younger v. Harris, 401 U.S. 37, 40-41 (1971)
- Taylor v. Ferguson, 2025 Ark. 180, 722 S.W.3d 498
- Knight v. State, 171 Ark. 882, 286 S.W. 1013 (1926)
- State v. Good Day Farm Ark., LLC, 2025 Ark. 207
- Gamble v. United States, 587 U.S. 678, 711, 724-26 (2019) (Thomas, J., concurring)
- Scarbrough v. State, 2024 Ark. 71, 687 S.W.3d 557
- Gwathney v. State, 2009 Ark. 544, 381 S.W.3d 744
- Walker v. State, 2025 Ark. 127, 719 S.W.3d 450
- Goins v. State, 318 Ark. 689, 890 S.W.2d 602 (1995)
- City of Little Rock v. Cir. Ct. of Pulaski Cnty., 2017 Ark. 219, 521 S.W.3d 113
- Sullivan v. State, 2012 Ark. 178
- Hanlin v. State, 356 Ark. 516, 157 S.W.3d 181 (2004)

- Stiles v. Hopkins, 282 Ark. 207, 666 S.W.2d 703 (1984)
- Echols v. State, 2015 Ark. App. 304, 462 S.W.3d 352
- Henley v. State, 95 Ark. App. 108, 234 S.W.3d 316 (2006)
- Evans v. Harrison, 2025 Ark. 164, 721 S.W.3d 753
- United States v. Sineneng-Smith, 590 U.S. 371 (2020)
- Greenlaw v. United States, 554 U.S. 237 (2008)
- Castro v. United States, 540 U.S. 375 (2003)
- United States v. Samuels, 808 F.2d 1298 (8th Cir. 1987)
- Walther v. FLIS Enters., Inc., 2018 Ark. 64, 540 S.W.3d 264
- Board of Trustees v. Andrews, 2018 Ark. 12, 535 S.W.3d 616
- Ark. Dep't of Corr. v. Williams, 2009 Ark. 282, 308 S.W.3d 609

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