

SUPREME COURT OF NEW JERSEY

State of New Jersey v. Jule Hannah

State v. Hannah · No. A-44-24; 089819 · Decided April 16, 2026

SUMMARY

The Supreme Court of New Jersey held that testimony interpreting cell site location information involves technical and specialized knowledge under N.J.R.E. 702 and must be presented by a qualified expert witness. The Court affirmed the Appellate Division’s reversal of Jule Hannah’s convictions, concluding that the lay testimony about cell tower data and the State’s related arguments risked misleading the jury and constituted an improper circumvention of the standards governing expert testimony.

CASE DETAILS

COURT	Supreme Court of New Jersey
WRITING FOR THE COURT	Justice Pierre-Louis; Chief Justice Rabner; Justice Patterson; Justice Wainer Apter; Justice Fasciale; Justice Noriega; Justice Hoffman
JURISDICTION	Supreme Court of New Jersey
DECIDED	April 16, 2026
DOCKET	A-44-24; 089819
DISPOSITION	affirmed
PROCEDURAL POSTURE	The State petitioned for certification from the Appellate Division's reversal of defendant's convictions and remand for a new trial. The Supreme Court granted certification and affirmed the Appellate Division.
STANDARD OF REVIEW	Evidentiary rulings are reviewed for abuse of discretion and will not be disturbed unless they are so wide of the mark as to constitute a clear error in judgment. The Court also reviewed the adequacy of the limiting instructions in light of the prejudice from the evidentiary error.
PRECEDENTIAL VALUE	Published and precedential opinion of the Supreme Court of New Jersey
PARTIES	State of New Jersey v. Jule Hannah, a/k/a Jule L. Hanna

TOPICS

expert testimony

evidence

relevance

standard of review

appellate procedure

PRACTICE AREAS

Evidence

Criminal procedure

Appellate procedure

QUESTIONS PRESENTED

1. Whether testimony interpreting and mapping historical cell site location information may be presented by a lay witness under N.J.R.E. 701 or must be presented by a qualified expert under N.J.R.E. 702.
2. Whether the trial court's limiting instructions cured the prejudice and potential jury confusion caused by the detective's CSLI testimony and the State's related summation arguments.
3. Whether the admission of the CSLI testimony constituted reversible evidentiary error.

HOLDINGS

1. Historical cell site location information involves technical and specialized knowledge beyond the ken of the average juror and must be presented to the jury by a witness qualified as an expert under N.J.R.E. 702.
2. The trial court improperly admitted Detective Leyman's CSLI testimony as lay opinion testimony because the testimony interpreted and mapped tower data in a manner that permitted inferences about the location and movement of Hannah's phone.
3. The trial court's repeated limiting instructions did not cure the prejudice or confusion caused by the improperly admitted CSLI testimony and the State's contradictory summation arguments.
4. The CSLI conclusions presented through Detective Leyman were unsupported by adequate technical or objective data and would have constituted an impermissible net opinion even if offered by an expert.

KEY QUOTATIONS

“CSLI involves technical and specialized knowledge that must be presented to a jury by an expert witness at trial.” (at 3)

“The technical and specialized knowledge required to interpret CSLI is beyond the ken of the average juror. Therefore, CSLI evidence must be presented by an expert witness.” (at 45)

“The State cannot circumvent the standards to which expert testimony is held under N.J.R.E. 702 by presenting the testimony through a lay witness rather than an expert.” (at 47)

FACTUAL BACKGROUND

Lopez was found shot to death in a vehicle after it crashed in Bridgeton. The State relied in part on historical cell site location information from Hannah's phone, DNA on a cigar butt in Lopez's vehicle, surveillance evidence, and a recorded call to support its theory that Hannah was in Lopez's vehicle before the homicide. A detective testified as a lay witness about the cell towers to which phones connected and linked Hannah's phone activity to the victim's route, while the prosecutor argued that a phone had to be close to the tower it accessed.

PROCEDURAL HISTORY

A Cumberland County grand jury indicted Hannah for offenses arising from the murder of Miguel Lopez. After a jury convicted him of first-degree murder and weapons offenses, the Appellate Division reversed and remanded for a new trial, holding that historical cell site location information had improperly been admitted through lay testimony rather than qualified expert testimony. The Supreme Court affirmed.

DISPOSITION

affirmed

REMAND INSTRUCTIONS

The Court affirmed the Appellate Division's judgment reversing defendant's convictions and remanding for a new trial.

CASES CITED

- State v. Burney, 255 N.J. 1 (2023)
- State v. Allen, 254 N.J. 530, 543 (2023)
- State v. Garcia, 245 N.J. 412, 430 (2021)
- State v. Medina, 242 N.J. 397, 412 (2020)
- Hrymoc v. Ethicon, 254 N.J. 446, 474 (2023)
- State v. Jones, 425 N.J. Super. 258, 276 (App. Div. 2012)
- State v. Sanchez-Medina, 231 N.J. 452, 465 (2018)
- State v. Higgs, 253 N.J. 333, 358 (2023)
- State v. Buckley, 216 N.J. 249, 261 (2013)
- State v. Sanchez, 247 N.J. 450, 466 (2021)
- State v. McLean, 205 N.J. 438, 459 (2011)
- Brindley v. Firemen's Ins. Co., 35 N.J. Super. 1, 8 (App. Div. 1955)
- State v. Bealor, 187 N.J. 574, 586 (2006)
- State v. Johnson, 120 N.J. 263, 294 (1990)
- Hopkins v. Fox & Lazo Realtors, 132 N.J. 426, 450 (1993)
- Wyatt by Caldwell v. Wyatt, 217 N.J. Super. 580, 591-92 (App. Div. 1987)
- Taing v. Braisted, 456 N.J. Super. 465, 469-71 (Law Div. 2017)
- Morales-Hurtado v. Reinoso, 457 N.J. Super. 170, 193 (App. Div. 2018)
- Townsend v. Pierre, 221 N.J. 36, 53 (2015)
- Pomerantz Paper Corp. v. New Cmty. Corp., 207 N.J. 344, 372 (2011)
- State v. Earls, 214 N.J. 564, 576 (2013)
- State v. Lunsford, 226 N.J. 129, 133 (2016)
- United States v. Hill, 818 F.3d 289, 295-96, 299 (7th Cir. 2016)

- United States v. Natal, 849 F.3d 530, 536 (2d Cir. 2017)
- United States v. Graham, 796 F.3d 332, 365-66 (4th Cir. 2015), rev'd on other grounds, 824 F.3d 421 (4th Cir. 2016) (en banc)
- State v. Boothby, 951 N.W.2d 859, 876, 878 (Iowa 2020)
- State v. Sinnard, 543 P.3d 525, 544 (Kan. 2024)
- State v. Wyman, 107 A.3d 641, 647-48 (Me. 2015)
- State v. Payne, 104 A.3d 142, 154-55 (Md. 2014)
- State v. Blurton, 484 S.W.3d 758, 771 (Mo. 2016)
- State v. Patton, 419 S.W.3d 125, 130 (Mo. App. 2013)
- Burnside v. State, 352 P.3d 627, 636 (Nev. 2015)
- Torrence v. Commonwealth, 603 S.W.3d 214, 228 (Ky. 2020)
- DYFS v. M.C. III, 201 N.J. 328, 340-42 (2010)
- State v. A.R., 213 N.J. 542, 561 (2013)
- In re Application for Order Authorizing Pen Register, 415 F. Supp. 2d 211, 213 n.3 (W.D.N.Y. 2006)

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