

SUPREME COURT OF THE STATE OF NEW YORK, APPELLATE DIVISION,
FIRST DEPARTMENT

The People of the State of New York v. Athanasios Ioannidis

Ioannidis, 2026 NY Slip Op 01465 (Supreme Court of the State of New York Appellate Division First Department 2026) · No. Ind. No. 00074/16; Appeal No. 6106; Case No. 2020-01387 · Decided March 17, 2026

SUMMARY

The New York Appellate Division, First Department, unanimously affirmed Athanasios Ioannidis's convictions and aggregate four-to-twelve-year sentence arising from a fatal unauthorized gas-delivery system and explosion. The court held that evidence concerning a prior flexible-hosing gas system was admissible under Molineux principles for non-propensity purposes, and it found no error in the denial of severance or any basis to reduce the sentence.

CASE DETAILS

COURT	Supreme Court of the State of New York, Appellate Division, First Department
WRITING FOR THE COURT	Manzanet-Daniels, J.P.; Kapnick, J.; Shulman, J.; Chan, J.; Hagler, J.
JURISDICTION	New York Supreme Court, Appellate Division, First Department
DECIDED	March 17, 2026
DOCKET	Ind. No. 00074/16; Appeal No. 6106; Case No. 2020-01387
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed from a judgment of the Supreme Court, New York County, entered after a jury trial and convicting him of multiple homicide-, assault-, reckless-endangerment-, and falsification-related offenses.
STANDARD OF REVIEW	The court reviewed the admission of the prior-act evidence and denial of severance for abuse of discretion, stating that the trial court did not improvidently exercise its discretion. The court found no basis to reduce the sentence.
PRECEDENTIAL VALUE	Published opinion
PARTIES	Athanasios Ioannidis, Defendant-Appellant v. The People of the State of New York, Respondent

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QUESTIONS PRESENTED

1. Whether evidence concerning the prior flexible-hosing gas-delivery system was inadmissible propensity evidence or was properly admitted under Molineux for non-propensity purposes.
2. Whether the probative value of the prior flexible-hosing evidence outweighed its potential for undue prejudice.
3. Whether the trial court abused its discretion by denying defendant's motion to sever his trial from those of his codefendants.
4. Whether defendant's sentence should be reduced.

HOLDINGS

1. The prior flexible-hosing system was evidence of a prior bad act subject to Molineux analysis, but it was properly admitted for non-propensity purposes, including providing background and completing the narrative of events and showing defendant's state of mind.
2. The trial court properly determined that the probative value of the prior flexible-hosing evidence outweighed its potential for undue prejudice.
3. The trial court did not improvidently exercise its discretion in denying defendant's request for a separate trial.
4. There was no basis to reduce defendant's aggregate sentence of four to twelve years.

KEY QUOTATIONS

“Evidence of the prior flexible hosing gas-delivery system constitutes evidence of a prior bad act subject to Molineux analysis and should have been analyzed as such” ([*1])

“It was highly relevant as background and to complete the narrative of events” ([*1])

“The probative value of the evidence of the prior flex hosing system also outweighed its potential for undue prejudice to defendant” ([*1])

FACTUAL BACKGROUND

Defendant was prosecuted for his role in installing an unauthorized gas-delivery system that diverted gas from 119 Second Avenue to a renovated building at 121 Second Avenue in Manhattan. The system contributed to an explosion on March 26, 2015, killing two people and injuring thirteen others. Before the charged system was installed, defendants had used a different flexible-hosing system that was dismantled after Con Edison shut off the gas; defendants were warned about the risks of improper installation and proceeded with a new unauthorized system designed by the same unlicensed plumber and concealed from regulators.

PROCEDURAL HISTORY

The Supreme Court, New York County, rendered judgment on January 17, 2020, as amended February 5, 2020, convicting defendant after a jury trial and sentencing him to an aggregate term of four to twelve years.

Defendant challenged the admission of evidence concerning a prior flexible-hosing gas-delivery system, the denial of severance from his codefendants, and his sentence. The Appellate Division unanimously affirmed.

DISPOSITION

affirmed

CASES CITED

- People v. Frumusa, 29 NY3d 364, 369-370 (2017)
- People v. Weinstein, 42 NY3d 439, 458 (2024)
- People v. Cass, 18 NY3d 553, 559-560 (2012)
- People v. Hu Sin, 44 NY3d 455, 459, 460-463 (2025)
- People v. Woody, 214 AD3d 157, 161 (1st Dept 2023)
- People v. Mahboubian, 74 NY2d 174, 183-185 (1989)

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