

MASSACHUSETTS SUPREME JUDICIAL COURT

Commonwealth v. Arias

SJC-13816 · No. SJC-13816 · Decided April 15, 2026

SUMMARY

The Massachusetts Supreme Judicial Court held that a motor vehicle stop based on a civil traffic infraction violated art. 14 of the Massachusetts Declaration of Rights because police delayed the stop for twenty-four hours without a reasonable justification. The court concluded that the Commonwealth failed to establish that the delayed seizure was reasonable under the totality of the circumstances. The court reversed the suppression ruling, vacated the judgment and verdict, and remanded the matter to the Superior Court.

CASE DETAILS

COURT	Massachusetts Supreme Judicial Court
WRITING FOR THE COURT	Dewar, J.; Budd, C.J.; Gaziano, J.; Kafker, J.; Wendlandt, J.; Georges, J.; Wolohojian, J.
JURISDICTION	Massachusetts Supreme Judicial Court
DECIDED	April 15, 2026
DOCKET	SJC-13816
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Direct appellate review of a criminal conviction and order denying in large part the defendant's motion to suppress evidence obtained during a motor-vehicle stop.
STANDARD OF REVIEW	The court adopted the motion judge's subsidiary findings of fact absent clear error and independently determined the correctness of the application of constitutional principles to those facts.
PRECEDENTIAL VALUE	Published opinion; precedential Massachusetts Supreme Judicial Court decision.
PARTIES	Jose Arias v. Commonwealth

TOPICS

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

PRACTICE AREAS

criminal procedure

constitutional law

search and seizure

motion to suppress

motor-vehicle law

QUESTIONS PRESENTED

1. Whether a motor-vehicle stop based on a previously observed civil traffic infraction violated article 14 of the Massachusetts Declaration of Rights and the Fourth Amendment because police waited approximately twenty-four hours before conducting the stop.
2. Whether the defendant's motion to suppress evidence obtained during the traffic stop should have been granted.

HOLDINGS

1. Although police may stop a motor vehicle after observing a civil traffic infraction, the stop is a seizure that must be conducted reasonably. There is no specific time limit, but the elapsed time between the observed infraction and the stop must be reasonable under the totality of the circumstances. A twenty-four-hour delay was unreasonable here because the Commonwealth did not provide a reasonable justification for its duration.
2. The Commonwealth bears the burden of establishing that a warrantless motor-vehicle stop was reasonable. The absence of evidence explaining a twenty-four-hour delay does not benefit the Commonwealth.
3. An officer's ulterior or pretextual motive to investigate a different offense does not by itself invalidate a traffic stop supported by an objectively observed motor-vehicle violation, but that motive does not itself reasonably justify an otherwise unexplained delay in making the stop.

KEY QUOTATIONS

"We agree that, while there is no "specific time limitation" on stopping a driver for a civil traffic violation, "the elapsed time between an observed violation and any subsequent stop must be reasonable upon consideration of the totality of the circumstances." (15)

"Considering the totality of the circumstances here, where the Commonwealth has shown that some amount of delay in stopping the defendant for a civil traffic violation was reasonable but has not provided any reasonable justification for a delay lasting twenty-four hours, we conclude that the Commonwealth has not met its burden to show that the stop of the defendant was reasonable." (19)

FACTUAL BACKGROUND

While conducting a drug investigation, Boston police observed the defendant commit a civil traffic infraction by passing a line of stopped vehicles on the right, failing to stop at a stop sign, and turning left in front of the line. The observing officer did not stop the defendant or summon a marked cruiser at that time because he considered it unsafe to follow the vehicle in an unmarked car. Approximately twenty-four hours later, police located the defendant and stopped his vehicle at the request of an officer who stated that police were looking to stop the vehicle for a drug investigation. A patfrisk revealed cocaine on the defendant, and additional cocaine was found in the vehicle.

PROCEDURAL HISTORY

A Suffolk County grand jury indicted the defendant for trafficking 200 or more grams of cocaine. A Superior Court judge denied the motion to suppress physical evidence in large part, although certain statements were suppressed. The defendant's first trial ended in a mistrial; the indictment was reduced to trafficking 100 to 200 grams of cocaine, and a second jury convicted him of trafficking 18 to 36 grams of cocaine. The Supreme Judicial Court granted the defendant's application for direct appellate review.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Reverse the portion of the June 17, 2021, order denying the motion to suppress, vacate the judgment, set aside the verdict, and remand the matter to the Superior Court.

CASES CITED

- Commonwealth v. Buckley, 478 Mass. 861 (2018)
- Commonwealth v. Delgado-Rivera, 487 Mass. 551, 555 (2021), cert. denied, 142 S. Ct. 908 (2022)
- Garcia v. Commonwealth, 486 Mass. 341, 349 (2020)
- Commonwealth v. Rodriguez, 472 Mass. 767, 773, 776-777 (2015)
- Commonwealth v. Daveiga, 489 Mass. 342, 350, 353-355 (2022)
- Whren v. United States, 517 U.S. 806, 809, 817-818 (1996)
- Delaware v. Prouse, 440 U.S. 648, 654-655, 659 (1979)
- Commonwealth v. Santana, 420 Mass. 205, 209-210 n.3 (1995)
- Commonwealth v. Rodriguez, 430 Mass. 577, 579 (2000)
- Rodriguez v. United States, 575 U.S. 348, 354-355 (2015)
- Commonwealth v. Cordero, 477 Mass. 237, 242 (2017)
- United States v. Hensley, 469 U.S. 221, 228-229 (1985)
- Brown v. Texas, 443 U.S. 47, 51 (1979)
- Commonwealth v. Pappas, 384 Mass. 428, 431 (1981)
- Commonwealth v. Long, 485 Mass. 711, 739 (2020) (Budd, J., concurring)
- United States v. Zuniga, 860 F.3d 276, 281-282 (5th Cir. 2017)
- United States v. Copeland, 321 F.3d 582, 594-595 (6th Cir. 2003)
- United States v. Mendonca, 682 F. Supp. 2d 98, 101, 104 (D. Mass. 2010)
- State v. Myers, 490 So. 2d 700, 701-702, 704 (La. Ct. App. 1986)
- United States v. Sandridge, 385 F.3d 1032, 1036 (6th Cir. 2004), cert. denied, 543 U.S. 1129 (2005)
- Commonwealth v. White, 475 Mass. 583, 587-588 (2016)
- Commonwealth v. Shields, 402 Mass. 162, 164 (1988)

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