

INDIANA COURT OF APPEALS

Bradley W. Hobbs v. State of Indiana

25A-CR-2343 · No. 25A-CR-2343 · Decided April 30, 2026

SUMMARY

The Indiana Court of Appeals affirmed Bradley W. Hobbs’s conviction for Level 6 felony leaving the scene of an accident and the accompanying habitual offender enhancement. The court held that sufficient evidence established Hobbs failed to provide identification information, render reasonable assistance, and notify authorities after the motorcycle accident. It further concluded that an automated 911 call from Hobbs’s cellphone did not satisfy his statutory duty because there was no evidence he knew of or affirmatively ensured the call.

CASE DETAILS

COURT	Indiana Court of Appeals
WRITING FOR THE COURT	Judge DeBoer; Judge Altice; Judge Kenworthy
JURISDICTION	Indiana Court of Appeals
DECIDED	April 30, 2026
DOCKET	25A-CR-2343
DISPOSITION	affirmed
PROCEDURAL POSTURE	Hobbs appealed his conviction for Level 6 felony leaving the scene of an accident and his habitual offender enhancement, arguing that the evidence was insufficient to support the conviction. He also challenged the denial of his motion to correct error and request for a new trial based on newly discovered evidence concerning the source of an automated 911 call.
STANDARD OF REVIEW	The court reviews sufficiency of the evidence by considering only the probative evidence and reasonable inferences supporting the verdict, without reweighing evidence or assessing witness credibility, and affirms unless no reasonable fact-finder could find the elements proven beyond a reasonable doubt. Statutory interpretation is reviewed de novo.
PRECEDENTIAL VALUE	published
PARTIES	Bradley W. Hobbs v. State of Indiana

TOPICS

criminal procedure

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standard of review

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether sufficient evidence supported Hobbs's conviction for leaving the scene of an accident.
2. Whether Indiana Code section 9-26-1-1.1(a)(2) required Hobbs to provide his name, address, vehicle registration, and driver's license to Whitham or someone attending her before leaving the scene, despite their long-term relationship and the one-vehicle nature of the accident.
3. Whether the statutory duty to provide reasonable assistance was excused because Hobbs was not personally directed by authorities and others were already assisting Whitham.
4. Whether an automated 911 call initiated by Hobbs's cellphone, without evidence that Hobbs knew of or affirmatively caused the call, satisfied his statutory duty to notify authorities or ensure that another person did so.

HOLDINGS

1. Indiana Code section 9-26-1-1.1(a)(2) plainly required Hobbs to provide his name, address, vehicle registration, and driver's license to Whitham or someone attending her before leaving the scene. Because Hobbs admitted that he left without providing any of that information, the evidence was sufficient.
2. The evidence was sufficient to prove that Hobbs failed to provide reasonable assistance to the injured passenger before leaving the scene. The duty was not eliminated because Hobbs was not personally directed by authorities or because other people were assisting the victim.
3. An automated 911 call initiated by Hobbs's cellphone did not satisfy Hobbs's statutory duty because the statute requires the operator to take affirmative action personally to notify authorities or to ensure that another person does so. Merely possessing a cellphone with an automated crash-notification feature, without knowing of or causing the call, was insufficient.

KEY QUOTATIONS

“Thus, overcoming the plain meaning on grounds of absurdity is “a very high bar[,]” and a feat Hobbs has not accomplished here.” (at 12)

“Merely owning a cellphone with this feature does not reflect that, after the accident happened, Hobbs “ensured” someone notified authorities.” (at 17)

“Hobbs’ phone took action, but he himself did nothing after the accident occurred to make sure authorities were notified.” (at 18)

FACTUAL BACKGROUND

Hobbs was operating a motorcycle carrying Aubree Whitham when the motorcycle crashed. Whitham was injured and initially unresponsive, while Hobbs left the scene before law enforcement and medical personnel arrived and did not provide identification information, assistance, or notice to authorities. An automated 911 call was made by a cellphone associated with the accident, and another person later made a 911 call, but the evidence did not show that Hobbs knew of or affirmatively caused either call. Hobbs contacted police several days later.

PROCEDURAL HISTORY

After a motorcycle accident in August 2023, the State charged Hobbs with Level 6 felony leaving the scene of an accident and later added a habitual offender enhancement. A jury found him guilty, he admitted the habitual offender allegation, and the trial court sentenced him to an aggregate five-year sentence, with three years executed and two years suspended to probation. The trial court denied his motion to correct error and request for a new trial based on posttrial information that the automated 911 call originated from his cellphone. The Indiana Court of Appeals affirmed.

DISPOSITION

affirmed

CASES CITED

- Rakhimov v. State, 260 N.E.3d 263, 266 (Ind. Ct. App. 2025)
- Love v. State, 73 N.E.3d 693, 696 (Ind. 2017)
- Coonce v. State, 240 N.E.3d 721, 723 (Ind. Ct. App. 2024)
- Anderson v. Gaudin, 42 N.E.3d 82, 85 (Ind. 2015)
- City of N. Vernon v. Jennings Nw. Reg'l Utils., 829 N.E.2d 1, 4-5 (Ind. 2005)
- Nield v. State, 677 N.E.2d 79, 81 (Ind. Ct. App. 1997)
- In re Guardianship of A.J.A., 991 N.E.2d 110, 113 (Ind. 2013)
- In re Visitation of J.P.H., 709 N.E.2d 44, 46 (Ind. Ct. App. 1999)
- R.R. v. State, 106 N.E.3d 1037, 1042 (Ind. 2018)
- Calvin v. State, 87 N.E.3d 474, 477-78 (Ind. 2017)
- Fix v. State, 186 N.E.3d 1134, 1139 (Ind. 2022)