

SUPREME COURT OF THE STATE OF NEW YORK, APPELLATE DIVISION,
FOURTH JUDICIAL DEPARTMENT

People v. Scott

2025 NY Slip Op 07167 (N.Y. Ct. App. 2025) · No. 892 KA 24-00398 · Decided December 23, 2025

SUMMARY

The New York Appellate Division, Fourth Department reversed Randall A. Scott’s murder conviction and dismissed the indictment. The court held that the evidence was legally insufficient to establish that Scott, who transported the shooter, shared the shooter’s intent to kill, and alternatively concluded that the verdict was against the weight of the evidence.

CASE DETAILS

COURT	Supreme Court of the State of New York, Appellate Division, Fourth Judicial Department
WRITING FOR THE COURT	Whalen, P.J.; Curran, J.; Montour, J.; Smith, J.; DelConte, J.
JURISDICTION	Supreme Court of the State of New York, Appellate Division, Fourth Judicial Department
DECIDED	December 23, 2025
DOCKET	892 KA 24-00398
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Defendant appealed from a Monroe County Court judgment convicting him, after a jury trial, of second-degree murder under an accessorial-liability theory.
STANDARD OF REVIEW	For legal sufficiency, the court viewed the evidence in the light most favorable to the People and asked whether any valid line of reasoning and permissible inferences could lead a rational person to the jury's conclusion. For weight of the evidence, the court independently reviewed the evidence in light of the elements charged and determined whether the jury was justified in finding guilt beyond a reasonable doubt.
PRECEDENTIAL VALUE	Published intermediate appellate opinion
PARTIES	Randall A. Scott v. The People of the State of New York

TOPICS

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appellate procedure

standard of review

evidence

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the evidence was legally sufficient to establish that defendant, as an accessory, shared the codefendant's intent to kill and intentionally aided the commission of second-degree murder.
2. Whether the verdict was against the weight of the evidence because the People failed to prove beyond a reasonable doubt that defendant shared the codefendant's intent to kill.

HOLDINGS

1. The evidence was legally insufficient to establish that defendant shared the codefendant's intent to kill the victim, an essential element of accessorial liability for intentional murder.
2. Even assuming the evidence was legally sufficient, the verdict was against the weight of the evidence because the People failed to prove beyond a reasonable doubt that defendant shared the codefendant's intent to kill.

KEY QUOTATIONS

*"[E]ven in circumstantial evidence cases, the standard for appellate review of legal sufficiency issues is 'whether any valid line of reasoning and permissible inferences could lead a rational person to the conclusion reached by the fact finder on the basis of the evidence at trial, viewed in the light most favorable to the People'" ([*1])*

*"An aider and abettor must share the intent or purpose of the principal actor, and there can be no partnership in an act where there is no community of purpose" ([*2])*

*"a defendant's presence at the scene of the crime, alone, is insufficient for a finding of criminal liability" ([*2])*

FACTUAL BACKGROUND

Defendant transported the codefendant to and from the location where the victim was fatally shot. The codefendant's GPS-equipped ankle bracelet established his whereabouts, defendant admitted transporting him, and video footage placed defendant's vehicle at locations corresponding to the codefendant's movements. Video also showed defendant picking up the codefendant immediately after the shots and speeding away, but the trial evidence did not establish that defendant knew the codefendant was armed or shared his intent to kill.

PROCEDURAL HISTORY

The Monroe County Court entered judgment on May 9, 2023, after a jury found defendant guilty of second-degree murder. On appeal, defendant challenged the legal sufficiency and weight of the evidence. The Appellate

Division unanimously reversed, dismissed the indictment, and remitted the matter to County Court for proceedings under CPL 470.45.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The judgment was reversed, the indictment was dismissed, and the matter was remitted to Monroe County Court for proceedings pursuant to CPL 470.45.

CASES CITED

- People v. Hines, 97 N.Y.2d 56, 62 (2001)
- People v. Rossey, 89 N.Y.2d 970, 971-972 (1997)
- People v. Cabey, 85 N.Y.2d 417, 420-421 (1995)
- People v. Ramos, 218 A.D.3d 1113, 1113-1116 (4th Dep't 2023)
- People v. McDonald, 172 A.D.3d 1900, 1901-1904 (4th Dep't 2019)
- People v. Price, 35 A.D.3d 1230, 1231 (4th Dep't 2006)
- People v. Hough, 151 A.D.3d 1591, 1593 (4th Dep't 2017)
- People v. Monaco, 14 N.Y.2d 43, 46 (1964)
- People v. La Belle, 18 N.Y.2d 405, 411-412 (1966)
- People v. Robinson, 90 A.D.2d 249, 251 (4th Dep't 1982), aff'd, 60 N.Y.2d 982 (1983)
- People v. Eldridge, 302 A.D.2d 934, 935 (4th Dep't 2003)
- People v. Danielson, 9 N.Y.3d 342, 349 (2007)
- People v. Bleakley, 69 N.Y.2d 490, 495 (1987)
- People v. Hawkins, 192 A.D.3d 1637, 1640 (4th Dep't 2021)
- People v. Delamota, 18 N.Y.3d 107, 117 (2011)