

SUPREME COURT OF MISSISSIPPI

Joseph Anthony Zattoni a/k/a Joseph A. Zattoni a/k/a Joseph Zattoni
v. State of Mississippi

Zattoni v. State · No. 2024-KA-01382-SCT · Decided May 28, 2026

SUMMARY

The Supreme Court of Mississippi affirmed Joseph Anthony Zattoni’s convictions for kidnapping and felon in possession of a firearm. The court held that the trial court erred by delaying acceptance of Zattoni’s felony-status stipulation and by admitting an unredacted police-interview recording containing prejudicial evidence of prior criminal conduct. The errors were deemed harmless in light of the overwhelming evidence of guilt and the limiting instruction given to the jury.

CASE DETAILS

COURT	Supreme Court of Mississippi
WRITING FOR THE COURT	Sullivan, Justice; Randolph, C.J.; King, P.J.; Coleman, P.J.; Ishee, J.; Griffis, J.; Branning, J.
JURISDICTION	Supreme Court of Mississippi
DECIDED	May 28, 2026
DOCKET	2024-KA-01382-SCT
DISPOSITION	affirmed
PROCEDURAL POSTURE	Zattoni appealed his convictions for kidnapping and felon in possession of a firearm after a jury trial in the Hinds County Circuit Court. He challenged the admission of evidence concerning his prior convictions and the admission of an unredacted recording of his police interview.
STANDARD OF REVIEW	Evidentiary rulings are reviewed for abuse of discretion; reversal is warranted only when the abuse results in prejudice to the accused. Harmless-error review asks whether the same result would have been reached absent the error and whether the evidence overwhelmingly supports the verdict.
PRECEDENTIAL VALUE	published
PARTIES	Joseph Anthony Zattoni a/k/a Joseph A. Zattoni a/k/a Joseph Zattoni v. State of Mississippi

TOPICS

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the trial court erred by informing the jury of the specific prior convictions alleged in the felon-in-possession count after Zattoni offered to stipulate that he was a convicted felon.
2. Whether the trial court erred by admitting the unredacted audio recording of Zattoni's police interview, which included references to unrelated criminal conduct and prior convictions, without conducting the required Rules 403 and 404(b) analysis.
3. Whether the evidentiary errors required reversal or were harmless in light of the overwhelming evidence of guilt and the limiting instruction.

HOLDINGS

1. When a defendant stipulates to the prior conviction required as an element of a felon-in-possession charge, the trial court must accept the stipulation, and introducing the specific details of the prior convictions has no probative value regarding firearm possession and is improperly prejudicial.
2. The trial court erred by admitting the unredacted recording of Zattoni's police interview solely because he had been advised of and waived his Miranda rights; Miranda compliance does not replace the required Mississippi Rules of Evidence 403 and 404(b) admissibility analysis.
3. The errors in admitting the details of Zattoni's prior convictions and the unredacted interview were harmless and did not require reversal.

KEY QUOTATIONS

“When the stipulation was presented at the beginning of the trial, the trial court was required to accept it.” (¶ 33)

“The fact that Zattoni had been Mirandized does not affect the balancing of prejudicial versus probative value of the recording because each standard protects different interests.” (¶ 37)

“Even though the trial court erred by allowing prejudicial evidence to be admitted, those errors were harmless.” (¶ 41)

FACTUAL BACKGROUND

After arguing with his girlfriend, Natalie Lambert, Zattoni shot at or near her vehicle as she attempted to leave, causing a flat tire. He followed her, blocked her vehicle, broke its driver's-side window, forcibly placed her in his truck, and drove with her for several hours while possessing a handgun. Lambert eventually left the truck and was stopped by police; officers observed bruises and abrasions and found shell casings near the residence.

Zattoni admitted firing the gun, possessing it while a convicted felon, and forcibly placing Lambert in the truck, although he disputed aspects of the kidnapping and shooting.

PROCEDURAL HISTORY

Zattoni was indicted for aggravated domestic violence, kidnapping, and felon in possession of a firearm, with a habitual-offender enhancement. The jury acquitted him of aggravated domestic violence but found him guilty of kidnapping and felon in possession of a firearm. The circuit court sentenced him as a nonviolent habitual offender to twenty-five years for kidnapping, with three years suspended, and five concurrent years for felon in possession of a firearm. The Mississippi Supreme Court held that the trial court erred in admitting details of Zattoni's prior convictions and the unredacted interview recording, but affirmed because the errors were harmless.

DISPOSITION

affirmed

CASES CITED

- Ross v. State, 954 So. 2d 968, 992 (Miss. 2007)
- Irby v. State, 893 So. 2d 1042, 1047 (Miss. 2004)
- Shaw v. State, 915 So. 2d 442, 445 (Miss. 2005)
- Jefferson v. State, 818 So. 2d 1099, 1104 (Miss. 2002)
- Herrington v. State, 102 So. 3d 1241, 1248 (Miss. Ct. App. 2012)
- Williams v. State, 991 So. 2d 593, 605-06 (Miss. 2008)
- Moore v. State, 348 So. 3d 322, 329 (Miss. 2022)
- Heidel v. State, 587 So. 2d 835, 843 (Miss. 1991)
- Pitchford v. State, 45 So. 3d 216, 246 (Miss. 2010)
- Jenkins v. State, 75 So. 3d 49, 55 (Miss. Ct. App. 2011)
- DeLoach v. State, 722 So. 2d 512, 518 (Miss. 1998)
- Welde v. State, 3 So. 3d 113, 117 (Miss. 2009)
- Crawford v. State, 754 So. 2d 1211, 1220 (Miss. 2000)
- Dilworth v. State, 754 So. 2d 1211 (Miss. 2000)
- Tate v. State, 912 So. 2d 919, 926 (Miss. 2005)
- Hutto v. State, 227 So. 3d 963, 998 (Miss. 2017)
- Ronk v. State, 172 So. 3d 1112, 1148 (Miss. 2015)
- King v. State, 857 So. 2d 702, 723 (Miss. 2003)
- Day v. State, 589 So. 2d 637, 644 (Miss. 1991)
- Miranda v. Arizona, 384 U.S. 436, 444 (1966)

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