Recent Court Decisions Relevant to Maine Law Enforcement Officers

United States Supreme Court
U.S. Court of Appeals for the First Circuit
Maine Supreme Judicial Court

2026 CASE LAW UPDATE

Dirigo Safety, LLC

JULY 1, 2026

Prepared by
Brian MacMaster
Chief Law Enforcement Consultant

Reviewed by
Scot Mattox, Esq.
Joshua Saucier, Esq.

Preparer's Note

The preparer of this document reviewed the published decisions of the United States Supreme Court, the U.S. Court of Appeals for the First Circuit, and the Maine Supreme Judicial Court from July 1, 2025, through June 30, 2026. The document includes summaries of cases of general interest and relevance to Maine law enforcement officers. This document does not list all decisions from the three appellate courts.

Dirigo Safety, LLC, is a privately owned training and consulting agency. It is not a law firm, nor does it formally represent any state agency. The summaries are those of the preparer and do not represent Dirigo Safety's legal opinions or advice. The information presented in this "2026 Case Law Update" is provided at no cost as a courtesy to all of Maine's law enforcement. It is intended for educational and training purposes only and should not be construed as legal advice, nor does it reflect the opinions of any state agency. Readers should always defer to the guidance of their supervisors, department counsel, or local prosecutors when applying the information presented here to other situations.

If a decision interests the reader, the entire text is accessible through the relevant Internet link. Since court decisions are highly fact-specific, it is advisable to review the entire decision for a more comprehensive understanding, especially before taking any enforcement or other actions.

© Dirigo Safety, LLC, July 1, 2026. All Rights Reserved. Not for Copy or Commercial Resale without the express written permission of Dirigo Safety, LLC.

Do you have questions, suggestions, or other comments?

Brian MacMaster
Dirigo Safety, LLC
95 Main Street · Auburn, ME 04210
brian.macmaster@dirigosafety.com

UNITED STATES SUPREME COURT

Fourth Amendment – Emergency Aid Standard

Case v. Montana

Decided January 14, 2026
https://www.supremecourt.gov/opinions/25pdf/607us1r06_19m1.pdf

Issue: Do police need probable cause to enter a home without a warrant under the Emergency Aid Exception to the Search Warrant Rule?

Facts: Police responded to a report from William Case's ex-girlfriend that he was threatening suicide and may have shot himself. Officers were aware of Case's mental health and substance abuse history, as well as prior suicide threats and confrontations with police. Upon arrival, they observed a notepad resembling a suicide note and an empty handgun holster. They received no response to attempts to contact Case. Believing he could be injured or at risk of imminent harm, the officers entered the home without a warrant to render emergency aid. An officer shot and injured Case when he emerged from a closet holding an object that appeared to be a gun. A handgun was recovered. Case was convicted of assaulting a police officer and appealed, arguing that the police lacked probable cause to enter his home. The trial court found the entry justified under emergency circumstances. The Montana Supreme Court upheld the conviction, concluding that police may enter a home for a welfare check if "objective, specific and articulable facts" would lead an experienced officer to suspect danger.

Holding: The U.S. Supreme Court unanimously ruled that police need only an objectively reasonable basis to believe someone is in danger, rather than probable cause. It declined to require probable cause in the context of emergency aid, affirmed the Montana Supreme Court's judgment, and held that the entry was reasonable under the Fourth Amendment.

Fourth Amendment – Qualified Immunity – Clearly Established Law

Zorn v. Linton

Decided March 23, 2026
https://www.supremecourt.gov/opinions/25pdf/25-297_bqm2.pdf

Issue: Was the officer entitled to qualified immunity for using a "pain-compliance" technique on a nonviolent protester?

Facts: During the inauguration of Vermont's governor, a group of protesters staged a sit-in at the state capitol to advocate for universal healthcare. When the building closed, police instructed protesters to leave or face arrest for trespassing. Some complied, while others, including Shela Linton, refused. Sgt. Jacob Zorn approached Linton, who remained seated and passively resisted. After multiple warnings, Sgt. Zorn applied a rear wristlock to lift Linton to her feet, prompting her to exclaim in pain. Linton alleged that this action caused physical and psychological injuries and filed a lawsuit, claiming the use of force violated her Fourth Amendment rights. The District Court granted summary judgment to Sgt. Zorn, holding that he was entitled to qualified immunity because it was not clearly established that his actions constituted excessive force in these circumstances. The Second Circuit Court of Appeals reversed, relying on its earlier decision in

© 2026 Dirigo Safety, LLC

Amnesty America v. West Hartford (2004), which held that the use of a rear wristlock on a passively resisting protester was clearly excessive force.

Holding: In a 6-3 decision, the U.S. Supreme Court reversed, ruling that Sgt. Zorn was entitled to qualified immunity because no clearly established law prohibited this specific action, especially after warnings were given. The Court found that *Amnesty America* failed to establish, with the requisite specificity, that Sgt. Zorn's conduct—using a wristlock after repeated warnings—violated the Fourth Amendment. The Court emphasized that qualified immunity protects officials unless precedent has placed the constitutional question beyond debate and found that no case had clearly held such conduct unlawful in similar circumstances.

Fourth Amendment – Reasonable Suspicion – Vehicle Stop

District of Columbia v. R.W.

Decided April 20, 2026
https://www.supremecourt.gov/opinions/25pdf/25-248_8m58.pdf

Issue: Did the police have reasonable suspicion to stop R.W. (a minor) when he attempted to drive away after the passengers fled?

Facts: In the early morning hours, a police officer in Washington, D.C., responded to a dispatch about a suspicious vehicle at a specific location. Upon arrival, the officer observed two individuals flee the car without apparent provocation, leaving at least one door open. The driver, R.W., then began to back the car out of its parking space with the rear door still open. The officer ordered R.W. to put his hands up and later recovered evidence that led to charges, including unauthorized use of a motor vehicle and felony receipt of stolen property. The trial court denied R.W.'s motion to suppress, finding reasonable suspicion based on the dispatch, the passengers' flight, the late hour, and the car's movement. On appeal, the District of Columbia Court of Appeals reversed the suppression ruling and vacated the adjudication. It discounted the dispatch and the passengers' flight as relevant factors and ruled that the officer lacked reasonable suspicion to stop the vehicle.

Holding: The U.S. Supreme Court held that the vehicle stop was supported by reasonable suspicion. The Court emphasized that the totality-of-the-circumstances test must be applied and that the Court of Appeals erred by disregarding key facts, including the dispatch and the passengers' flight, in its analysis.

Second Amendment – Firearms Possession by Users of Unlawful Drugs

U.S. v. Hemani

Decided June 18, 2026
https://www.supremecourt.gov/opinions/25pdf/24-1234_g2bh.pdf

Issue: Does the federal statute (18 U.S.C. § 922(g)(3)) that prohibits unlawful users of controlled substances (like marijuana) from possessing firearms violate the Second Amendment?

Facts: Ali Danial Hemani lived in Texas with his parents and held a stable job. In August 2022, federal agents executed a search warrant at the Hemani family home. Authorities initially searched because they suspected family members of ties to terrorist organizations. During the search,

© 2026 Dirigo Safety, LLC

Hemani was fully cooperative. He surrendered a Glock handgun he kept locked in a safe for self-defense. He also directed agents to roughly 60 grams of marijuana on the property. Agents also found a small amount of cocaine in his parents' closet. Hemani openly admitted that he consumed marijuana recreationally. More than six months after the raid, a federal grand jury indicted Hemani for violating 18 U.S.C. § 922(g)(3). This federal statute makes it a felony for an "unlawful user of... a controlled substance" to possess a firearm. The government's case rested entirely on Hemani's status as a regular drug user. The prosecution never alleged that Hemani was actively intoxicated or using marijuana at the exact moment he possessed the firearm, nor did it claim he used the gun in a dangerous manner. Hemani filed a motion to dismiss the indictment, arguing that stripping him of his gun rights based solely on his recreational drug habits violated his Second Amendment rights. The U.S. District Court agreed and dismissed the indictment. The federal government appealed the decision, but the U.S. Court of Appeals for the Fifth Circuit affirmed the dismissal. The court ruled that applying the statute to an occasional, non-violent drug user was unconstitutional under recent gun-control legal frameworks. The Department of Justice petitioned the Supreme Court, which agreed to hear the case to resolve the constitutional dispute over the firearm ban.

Holding: The U.S. Supreme Court ruled that the government's application of the law to occasional, recreational drug users was unconstitutional. The justices found the prohibition to be overbroad, as it swept recreational marijuana users into the same category as dangerous individuals addicted to drugs without requiring proof of actual dangerousness or simultaneous intoxication while possessing the firearm. The Court's decision is narrow, addressing only the automatic application of the statute to regular drug users without further showing.

Second Amendment – Firearms on Private Property Open to the Public

Wolford v. Lopez

Decided June 25, 2026
https://www.supremecourt.gov/opinions/25pdf/24-1046_nmio.pdf

Issue: Can states constitutionally prohibit licensed concealed-carry permit holders from bringing firearms onto private property open to the public (such as shops and restaurants) unless the property owner has explicitly granted permission?

Facts: Three residents of Maui County, Hawaii, each holding a concealed-carry firearm permit, along with an organizational plaintiff, challenged a Hawaii statute prohibiting the carrying of firearms on private property open to the public unless the owner gives express, affirmative consent. This law significantly limited the places where permit holders could lawfully carry. The statute imposed new burdens: permit holders had to obtain explicit permission before entering everyday establishments such as stores and restaurants, reversing the traditional rule that entry was presumed permissible unless expressly forbidden.

Holding: The U.S. Supreme Court ruled 6-3 that the Hawaii law requiring concealed-carry permit holders to obtain express permission from property owners before bringing firearms onto private property open to the public (such as businesses, shops, and restaurants) violates the Second and Fourteenth Amendments. The decision will affect not only Hawaii but also four other states – California, Maryland, New York, and New Jersey – that have similar laws.

© 2026 Dirigo Safety, LLC

Fourth Amendment – Geofence Warrants

Chatrie v. United States

Decided June 29, 2026

https://www.supremecourt.gov/opinions/25pdf/25-112_0am4.pdf

Issue: Did the execution of a "geofence" warrant[1] violate the Fourth Amendment?

Facts: As part of an investigation of an armed robbery at a credit union in Virginia, police secured a multi-step "geofence" warrant requiring Google to identify all devices within a 150-meter radius of the bank during the hour of the crime. The dragnet initially captured 19 anonymous devices, and police later narrowed the list to identify three users, ultimately leading to the arrest of Okello Chatrie. Chatrie moved to suppress the location data, arguing that the warrant was an unconstitutional, overly broad "general warrant" that lacked particularized probable cause to search the digital records of dozens of innocent people.

Holding: Individuals have a reasonable expectation of privacy in their cell phone location data. The U.S. Supreme Court held 6-3 that this type of dragnet search, which sweeps up vast amounts of private, location-based information for individuals simply present in the vicinity of a crime without a particularized suspect, is an unconstitutional search under the Fourth Amendment. Because the Court found the warrant unconstitutional but remanded the case, the lower courts must now reevaluate whether the evidence can still be used at trial under the "good-faith exception," which excuses police who acted in good faith reliance on a signed warrant.

—¦—

[1] Cell phones and the apps they use collect GPS data that continually records the phone's—and its owner's—movements. This location data, which can show with precision where a cell phone user has been at every moment over the course of years, can be stored by companies like Google. In the past decade, courts have begun approving police requests for so-called "geofence warrants," which require these companies to turn over the location history and identities of people whose phones were near a specified place within a specified timeframe.

© 2026 Dirigo Safety, LLC

U.S. Court of Appeals for the First Circuit

Fourth Amendment – Probable Cause – Qualified Immunity – Clearly Established Law

Velez v. Eutzy

Decided September 16, 2025
https://www.ca1.uscourts.gov/sites/ca1/files/opnfiles/24-1594P-01A.pdf

Issue: Did the police have probable cause to arrest Velez after a traffic stop, and were the officers entitled to qualified immunity for using force?

Facts: Velez was stopped by Manchester, New Hampshire, police officers for vehicle equipment violations. After parking near his residence, Velez did not immediately comply with orders to exit his car. When he verbally refused and reached for his phone, officers attempted to remove him, leading to a physical struggle. During the altercation, one officer struck Velez multiple times and tased him twice. Velez was arrested and charged with misdemeanors and a traffic violation; he pleaded guilty only to the traffic violation. He later sued the officers, alleging wrongful arrest and excessive force. The federal district court granted summary judgment to the officers, finding probable cause for the arrest and that the force used was not excessive. Velez appealed.

Holding: The First Circuit Court of Appeals concluded that the officers had probable cause to arrest Velez for resisting and that, although one officer's use of force was excessive, the officer was shielded from liability under qualified immunity because the law was not clearly established in the specific context at the time, noting that no precedent had clearly held such conduct unlawful in similar circumstances.

Fourth Amendment – Excessive Force – Disputed Facts

Conlon v. Scaltreto

Decided October 22, 2025
https://www.ca1.uscourts.gov/sites/ca1/files/opnfiles/24-1634P-01A.pdf

Issue: Did police use unreasonable and excessive force when they fatally shot a man during a mental health crisis?

Facts: Michael Conlon, experiencing a mental health crisis, was fatally shot by police officers in his Newton, Massachusetts, apartment building after a report of an attempted armed robbery at a nearby candy store. When officers arrived, Conlon, holding a kitchen knife, fled into his apartment building. Officers pursued him to the third floor, where he threatened self-harm and exhibited erratic behavior. Police attempted to negotiate with him for about twenty minutes, eventually convincing him to drop the knife and a fire extinguisher. As officers prepared to incapacitate him with a beanbag shotgun, the weapon malfunctioned. Some officers reported that Conlon then picked up the knife and moved toward them, prompting two officers to fire their sidearms, resulting in Conlon's death. His parents filed suit, alleging excessive force. The district court dismissed all claims, finding that the officers were entitled to qualified immunity.

© 2026 Dirigo Safety, LLC

Holding: On appeal, the United States Court of Appeals for the First Circuit affirmed the dismissal of all claims except the excessive force claim against the officers related to the fatal shooting. The court held that there were disputed material facts regarding whether the decedent was armed and posed an immediate threat when lethal force was used; these disputed facts were enough to make dismissal improper.[2] The judgment was vacated as to this claim and remanded for further proceedings.

Felon in Possession of Firearm – Constructive Possession – Sufficiency of Evidence

U.S. v. Abercrombie

Decided December 16, 2025
https://www.ca1.uscourts.gov/sites/ca1/files/opnfiles/24-1474P-01A.pdf

Issue: Was the evidence sufficient to support the finding of constructive possession of a firearm?

Facts: Tevin Abercrombie was indicted for unlawful possession of a firearm and ammunition by a felon after Boston police discovered a loaded pistol under the front passenger seat of a car in which he was seated. Video evidence and police testimony established that he exclusively occupied the front passenger seat from the time the car arrived at a market until the stop, wore a latex glove on his right hand, and repeatedly bent toward the floor mat area where the pistol was found. Abercrombie argued that the evidence was insufficient to prove possession. The trial court found that the circumstantial evidence—including the glove, exclusive control over the seat, and his actions toward the floor—was sufficient for a reasonable jury to find constructive possession beyond a reasonable doubt. Abercrombie appealed.

Holding: The Court of Appeals for the First Circuit held that there was sufficient evidence to support the jury's verdict of constructive possession.[3]

Fourth Amendment – Warrantless Entry – Emergency Aid Doctrine

United States v. Rowell

Decided February 18, 2026
https://www.ca1.uscourts.gov/sites/ca1/files/opnfiles/24-1136P-01A.pdf

Issue: Did the police violate the Fourth Amendment by conducting a warrantless entry into an apartment to locate a missing minor?

Facts: Rowell was convicted of sex trafficking after police found a missing girl in an apartment where he was staying. Police responded to a missing-person report filed by the minor's father, who believed the child was endangered. Investigators traced the minor's social media activity to an IP address linked to the apartment. After gaining access to the building, the officers opened the unlocked apartment door. They entered, stepping a short distance inside before asking the occupants whether they could search for the minor. The district court denied the defendant's

[2] Unresolved factual issues, or "genuine issues of material fact," preclude summary judgment and require the case to proceed to trial or for the parties to engage in an alternative dispute resolution.

[3] Constructive possession is a legal theory under which a person is deemed to possess an item—even if it is not in the person's direct physical custody—if the person has the power and intention to exercise dominion and control over it.

© 2026 Dirigo Safety, LLC

motion to suppress evidence of the police entry, relying on the "emergency aid" exception to the warrant requirement. Rowell appealed.

Holding: On appeal, the Court of Appeals for the First Circuit agreed that the police entry was justified under the emergency aid exception. Citing *Case v. Montana*, decided by the U.S. Supreme Court just a month earlier, the Court said the standard for reasonableness was whether the officers had an "objectively reasonable basis" to believe that an emergency existed and that the place to be searched was reasonably linked to the perceived emergency. The Court noted that the factors supporting such a belief in this case included the minor's father reporting the child missing and expressing fear for her physical safety, and the minor's social media account was recently connected to the apartment's IP address. Together, these factors provided a reasonable basis to believe that the child was in the apartment and in danger.

Fourth Amendment – Search of Cell Phone – Scope of Search

United States v. Deschambault

Decided May 18, 2026
https://www.ca1.uscourts.gov/sites/ca1/files/opnfiles/24-1275P-01A.pdf

Issue: Was the evidence of sexual exploitation found on the cell phone beyond the scope of the original drug warrant, violating the Fourth Amendment?

Facts: Rayevon Deschambault was arrested in Maine following a controlled drug buy. During the arrest, officers found an iPhone under his car seat, along with drug-related items. They obtained a warrant to search the phone for evidence of drug trafficking. During the search, officers found videos showing Deschambault engaging in sexual acts with a minor. The discovery led to federal charges of sexual exploitation of a minor. Deschambault argued that the warrant lacked probable cause and particularity and that officers exceeded its scope. The district court denied a motion to suppress. Deschambault appealed.

Holding: The First Circuit Court of Appeals held that the warrant was supported by probable cause and sufficiently particular. It also concluded that officers did not exceed the warrant's scope by viewing the videos, which were relevant to the drug investigation, and that evidence lawfully discovered in one investigation may be used to prosecute a different crime. The court affirmed the convictions.

—¦—

© 2026 Dirigo Safety, LLC

MAINE SUPREME JUDICIAL COURT

Fifth Amendment – Miranda – Interrogation

State v. Aldrich

Decided February 5, 2026
https://www.courts.maine.gov/courts/sjc/lawcourt/2026/26me008.pdf

Issue: Was a post-arrest statement made in violation of *Miranda*?

Facts: Aaron Aldrich was convicted of two counts of murder and possession of a firearm by a prohibited person. Aldrich went to a residence in Poland, Maine, carrying a rifle. He shot both an adult and a teenager multiple times, and took a handgun and cash before leaving. He was apprehended in New Hampshire after fleeing in a stolen van. Aldrich sought to suppress a post-arrest statement: "I haven't killed anybody, I know that." The trial court denied suppression. Aldrich argued on appeal that evidence of his statement that he had not killed anyone should have been suppressed because he made it without being advised of his *Miranda* rights.

Holding: The Maine Supreme Judicial Court held that the denial of the motion to suppress was correct because Aldrich was not subjected to custodial interrogation. While there was no dispute that he was in custody when the Maine detectives spoke with him, the only issue was whether the police comments that preceded Aldrich's statements constituted "interrogation" under Miranda. Neither a statement of an intent to question nor a reply ("I haven't killed anybody, I know that.") about what is under investigation constituted interrogation or its functional equivalent.

Scientific merit and reliability of forensic podiatry

State v. Brackett

Decided February 5, 2026
https://www.courts.maine.gov/courts/sjc/lawcourt/2026/26me009.pdf

Issue: Is forensic podiatry established or properly validated as a forensic discipline?

Facts: The case involves the conviction of Kaile Brackett for murder after the stabbing death of Kimberly Neptune, who was found in her apartment with 484 sharp-force injuries. The prosecution presented evidence, including surveillance footage, witness testimony about Brackett's relationship with the victim, evidence that the victim's bank card was used, and forensic evidence from the crime scene. The prosecution relied on expert testimony comparing partial, sock-clad bloody footprints found at the scene to prints taken from Brackett in prison. Brackett objected to the admission of the forensic podiatry evidence, arguing that it lacked scientific reliability. The trial court admitted the expert testimony over her objections, and the jury ultimately found Brackett guilty. She appealed, alleging prosecutorial misconduct and challenging the admission of expert testimony.

Holding: The Maine Supreme Judicial Court held that the trial court erred in admitting the forensic podiatry testimony. The expert's methodology lacked scientific rigor and was insufficiently grounded in recognized standards. The Court also found that the prosecutor's closing arguments improperly characterized this evidence as definitive proof of Brackett's presence at the scene. The

© 2026 Dirigo Safety, LLC

Court vacated Brackett's conviction, holding that the State may retry Brackett but must exclude testimony regarding the footprint comparison.

Fourth Amendment – Warrantless Breath Test

State v. Davis

Decided February 24, 2026
https://www.courts.maine.gov/courts/sjc/lawcourt/2026/26me016.pdf

Issue: Does a warrantless breath test administered following an OUI arrest violate the defendant's constitutional rights?

Facts: Austin Davis was arrested by an Orono police officer. He was taken to the station to perform an Intoxilyzer test, and the test procedures began. During the 15-minute observation period, Davis began to express doubt about taking the breath test and indicated he would not consent. The officer read Form DI-140 (the "green form") to Davis. The officer then informed Davis that if he took the breath test, he would receive a summons and be allowed to go home. He also told Davis that if he did not take the test, he was going to go to jail, that not doing a test "just makes things worse," and that Davis "should blow" into the instrument. Davis eventually blew into the instrument and was subsequently charged with OUI. He moved to suppress the breath test results, arguing that his consent was not voluntary because of the officer's statements and actions. The trial court denied the motion, citing *Birchfield v. North Dakota (2016),* which held that warrantless breath tests incident to arrest do not require consent under the Fourth Amendment. Davis appealed.

Holding: The Maine Supreme Judicial Court held that, under *Birchfield*, the Fourth Amendment permits warrantless breath tests as searches incident to arrest, so Davis's consent was immaterial to the admissibility of the test results. The court further concluded that the officer's actions did not render the search unreasonable, as there were no false statements or arbitrary conduct, and the incentives provided by the officer were permissible. The judgment was affirmed.

Fourth Amendment – Vehicle Stop – Reasonable Suspicion – Estimated Speed

State v. Rhoades

Decided March 10, 2026
https://www.courts.maine.gov/courts/sjc/lawcourt/2026/26me023.pdf

Issue: Was a police officer's uncorroborated visual estimate that Rhoades was driving 20 mph over the speed limit sufficient to justify the initial traffic stop?

Facts: A Lincoln police officer observed a vehicle that appeared to be speeding and conducted a traffic stop. The driver, Kenneth Rhoades, was uncooperative and showed signs of impairment, including slurred speech and the odor of alcohol. During the encounter, Rhoades initially denied drinking but later admitted to consuming two alcoholic beverages. After Rhoades became aggressive toward the officer, he was transported to the police station, where he ultimately submitted to a breath test showing a blood alcohol concentration of 0.16%. The State charged Rhoades with operating under the influence, with two prior OUI offenses within ten years. Rhoades filed a motion to suppress the evidence, arguing that the officer lacked reasonable

© 2026 Dirigo Safety, LLC

articulable suspicion to justify the stop. The trial court denied the motion, and Rhoades was convicted. He appealed.

Holding: The Maine Supreme Judicial Court affirmed the judgment. The court held that, given the officer's training and experience, the officer's visual estimate of Rhoades's speed provided reasonable articulable suspicion for the stop. As well, the court noted that the visually estimated speed was 20 mph over the speed limit, "an infraction significant in magnitude." The officer testified that he had been a member of the Lincoln Police Department for 10 months and, before that, had been a deputy sheriff for 18 years, including 14 on patrol. He graduated from the Maine Criminal Justice Academy, where he was trained and certified in visual estimation of vehicle speeds. He also testified that officers were trained to estimate speed visually within five miles per hour. During his years on patrol, he estimated vehicle speeds daily and testified that his radar confirmed his estimates were accurate to within 3 to 4 miles per hour.

Fourth Amendment – Vehicle Stop on Private Property – Reasonable Suspicion

State v. Martin

Decided March 10, 2026
https://www.courts.maine.gov/courts/sjc/lawcourt/2026/26me024.pdf

Issue: Was there reasonable suspicion to conduct a stop of a vehicle in a private parking lot when a necessary element of the suspected offense required the vehicle to be on a public way?

Facts: Joshua Martin was arrested after a Burger King manager reported that he saw Martin with an open alcoholic beverage container in his vehicle and believed he had been drinking and driving. Police responded, blocked Martin's vehicle from leaving the parking lot, and observed an open can of alcohol. Both Martin and his passenger provided false names; Martin ultimately admitted his real identity after being informed he was under arrest for failing or refusing to provide evidence of his correct name. The officers discovered that he had six active arrest warrants and 12 sets of active bail conditions. A search incident to arrest yielded methamphetamine, fentanyl, drug paraphernalia, and cash on his person and in his vehicle. The trial court initially granted Martin's motion to suppress, concluding that the stop lacked reasonable suspicion because the vehicle was not on a public way, a necessary element of the offense of possessing an open container of an alcoholic beverage. The State moved for further findings and reconsideration, arguing that the parking lot was accessible only from a public way and that the officers reasonably believed a violation had occurred or was imminent. The court found that Martin began moving his vehicle in the parking lot upon the officer's approach, and that his travel would have ultimately brought him onto a public way. There was a reasonable belief that Martin was about to commit the offense of operating a vehicle on a public way with an open container of an alcoholic beverage. After reconsideration, the court denied the motion to suppress and concluded that the stop and subsequent searches were lawful. Martin appealed.

Holding: The Maine Supreme Judicial Court affirmed, holding that the trial court did not err or abuse its discretion in reconsidering its suppression ruling. It found that the stop was supported by reasonable articulable suspicion.

—┼—

© 2026 Dirigo Safety, LLC