

State of New York Court of Appeals

Summaries are prepared based on the parties' briefs and are for background purposes only.

To be argued Wednesday, April 15, 2026

In the Matter of Anderson v Hein (230 AD3d 880 [AD3])
Court PASS Docket No. APL-2025-00099

In New York, eligible low-income adults without dependent children may receive state-funded cash benefits through Safety Net Assistance (SNA). With limited exceptions, individuals who receive SNA must engage in work activities as a condition of eligibility. In some circumstances, SNA recipients may be assigned to participate in work experience programs (WEP). Although WEP participants are not paid wages for the hours they work, the maximum number of hours they may be required to work is calculated by dividing their SNA benefit amount by the applicable minimum wage, ensuring compliance with the minimum wage requirement in the federal Fair Labor Standards Act.

Federal law also establishes the Supplemental Security Income (SSI) program, administered by the Social Security Administration (SSA), which provides federally funded cash benefits to low-income individuals who are aged, blind, or disabled. If a New York SNA recipient reasonably appears eligible for SSI, they must apply for those benefits. If a SNA recipient is awarded SSI, they are no longer eligible for SNA.

Petitioners received SNA while their SSI applications were pending and, as a condition of receiving SNA, worked in WEP placements. Their work hours were set by dividing the amount of SNA they received by the minimum wage.

Eventually, the SSA granted their applications for SSI benefits, including an initial lump-sum award with retroactive payments. Pursuant to New York's agreement with the SSA, the State recouped the amount of SNA benefits it paid to petitioners from their initial lump-sum retroactive payment of SSI. The State did not credit them for the minimum-wage value of their WEP labor.

Petitioners commenced this proceeding challenging that practice, arguing that it unlawfully deprived them of earned minimum wages by effectively requiring them to "pay back" the value of their labor.

Supreme Court agreed with petitioners, saying the State must credit the minimum-wage value of their WEP hours when recouping SNA from their retroactive SSI awards. On appeal, the Appellate Division, Third Department, reversed, holding that the State's practice does not violate the Fair Labor Standards Act and that the State may recover the full amount of SNA without applying any WEP wage credit. The court reasoned that SNA is "inherently related to SSI benefits" because both forms of assistance cover the same basic needs for the same period. Because interim assistance and SSI address the same needs for the same months, the Appellate Division concluded, reimbursing the State merely prevents double-payment and does not reduce the value of the SNA the recipient received while performing WEP.

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People v Jamien Harris (239 AD3d 1279 [AD4])
Court PASS Docket No. APL-2025-00144

On November 21, 2021, Buffalo Police responded to a home and encountered Jamien Harris in distress. Officers spoke to Ms. Harris inside the home, observed a gun at her feet, and discovered her grandmother was dead on the couch from a gunshot wound. Officers recovered two guns from the home and Ms. Harris made statements acknowledging she played with the guns and suggesting she may have accidentally fired a shot that struck her grandmother. Witnesses stated they heard gunshots the evening before, on November 20.

Ms. Harris was initially indicted only for two counts of simple criminal possession of a firearm, pleaded guilty, and was sentenced to five years' probation. Several months later, after DNA analysis linked her to the gun that fired the fatal shot, Ms. Harris was indicted for second degree murder.

Ms. Harris moved to dismiss the murder indictment, arguing that separate prosecutions violated CPL 40.40's mandatory joinder provision because her possession of the firearms and the homicide were part of the same criminal transaction, and the People possessed legally sufficient evidence to charge murder before she entered her plea to the possession counts.

The People opposed dismissal, asserting that the simple possession on November 21 was a separate criminal incident from the homicide the previous day and that the DNA and ballistic evidence necessary to support a homicide charge was not yet available at the time of the gun-possession plea.

County Court agreed with Ms. Harris and dismissed the murder indictment.

On the People's appeal, the Appellate Division, Fourth Department, reversed, holding that the two offenses did not arise from the same criminal transaction. The majority reasoned that the possession charge was based on police observations on November 21, whereas the homicide allegedly occurred on November 20, and the events were therefore not "so closely related in point of time and circumstance" as to constitute a single criminal incident. Justice Lindley dissented, concluding the events occurred in the same place and within a single, unbroken timeframe and thus formed one criminal transaction.

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People v Jarelle Brazeal (235 AD3d 890 [AD2])
Court PASS Docket No. APL-2025-00111

People v Miguelina Lora (236 AD3d 820 [AD2])
Court PASS Docket No. APL-2025-00145

In 2021, Jarelle Brazeal stabbed his husband with a kitchen knife. In 2022, he pleaded guilty to attempted assault in the second degree and was sentenced to five years' probation.

In 2019, Miguelina Lora drove a car with a blood alcohol content more than three times the legal limit. In 2022, she pleaded guilty to aggravated DWI and was sentenced to five years' probation.

In both cases, the sentencing court included "Condition 28" as part of the sentence of probation. Condition 28 is a "consent to search" provision authorizing a probation officer to search the probationer's vehicle and home and to seize any illegal drugs, drug paraphernalia, firearms or other weapons, or other contraband.

In separate appeals, Mr. Brazeal and Ms. Lora challenged the inclusion of Condition 28 as part of their probation sentences.

The Appellate Division, Second Department, rejected both challenges. That court relied on Penal Law § 65.10(1) and held that sentencing courts may require a defendant to consent to searches by a probation officer for weapons or other contraband, so long as the condition is reasonably related to the defendant's rehabilitation or necessary to ensure that the defendant will lead a law-abiding life. The court noted that the sentencing judge must ensure such a condition is individually tailored to the offense and the defendant's particular circumstances, including their background.

As to Mr. Brazeal, the court held that Condition 28 was reasonably related to ensuring that he led a law-abiding life, given that he used a weapon during the underlying offense and had a history of violence.

As to Ms. Lora, the court held that Condition 28 was individually tailored to her offense and therefore reasonably related to her rehabilitation or necessary to ensure that she led a law-abiding life.

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People v Joseph A. Meyers (236 AD3d 1499 [AD4])
Court PASS Docket No. APL-2025-00109

In 2017, Joseph A. Meyers was convicted by a jury of first-degree murder, second-degree murder, arson, falsifying business records, attempted insurance fraud, and conspiracy in connection with a fire that killed David O'Dell in Steuben County. He was sentenced to 23 years to life.

Following the conviction, the court stenographer failed to produce transcripts of key portions of the trial, leaving jury selection, opening statements, summations, jury instructions, jury notes, and the verdict missing or unintelligible.

On appeal, the Appellate Division, Fourth Department, held that the missing and defective transcripts precluded meaningful appellate review, characterizing the state of the record as "deplorable." The court declined Mr. Meyers' request for summary reversal and instead remitted the matter to Steuben County Court for a reconstruction hearing.

Over several days in 2022, the retired trial judge, prosecutors, former defense attorneys, and court staff testified from their notes and recollection. The court admitted the retired trial judge's contemporaneous trial notes as well as the prosecutor's handwritten notes on the jury instructions.

After the reconstruction hearing, the Appellate Division, with the Presiding Justice dissenting, affirmed the conviction. The majority concluded that Mr. Meyers failed to show that the reconstructed record was inadequate to protect his right to appeal and determined that the combined original and reconstructed materials provided a sufficient record for review. The Presiding Justice disagreed, concluding that the record remained insufficient and that this was one of the rare circumstances in which a new trial was required.