

Lagrone v. State

The defendant challenged his conviction on the basis that the trial court denied his motion to suppress a confession obtained following the execution of an arrest warrant. The defendant claimed that the affidavit supporting the warrant was insufficient in that while it contained information that witnesses had identified a photo of a suspect, the affidavit did not state that the identified photo was of the defendant. In evaluating whether sufficient facts were alleged in the affidavit to support the issuance of the warrant, the court affirmed that its review was limited to the “four corners” of the affidavit itself, and no consideration of external factors would be permitted. Although the scope of review is necessarily limited, the court asserted that it need not take place in a vacuum, and that common sense should be applied in drawing reasonable inferences from facts stated in the affidavit. Applying this reasoning, the court concluded that it was reasonable for the magistrate to deduce that the photo identified by witnesses was that of the individual sought and not of another person and upheld the warrant.