

SUPREME COURT OF MISSISSIPPI

Haynes v. State

250 So. 3d 1241 (Miss. 2018) · Decided May 31, 2018

SUMMARY

The Mississippi Supreme Court affirmed Darius Parnell Haynes's conviction for possession of cocaine while in possession of a firearm. The court held that the evidence was legally sufficient to establish constructive possession because Haynes was near the cocaine and had used the same cocaine earlier that evening.

CASE DETAILS

COURT	Supreme Court of Mississippi
WRITING FOR THE COURT	Chamberlin, Justice; Randolph, P.J.; Coleman, J.; Maxwell, J.; Beam, J.; Waller, C.J.; Kitchens, P.J.; King, J.; Ishee, J.
JURISDICTION	Mississippi
DECIDED	May 31, 2018
DISPOSITION	affirmed
PROCEDURAL POSTURE	Haynes appealed from a jury conviction and the denial of his motion for judgment notwithstanding the verdict, challenging the legal sufficiency of the evidence supporting his cocaine-possession conviction.
STANDARD OF REVIEW	The Supreme Court of Mississippi reviews a trial court's ruling on the legal sufficiency of the evidence de novo, viewing the evidence in the light most favorable to the State and asking whether any rational trier of fact could have found the essential elements beyond a reasonable doubt.
PRECEDENTIAL VALUE	Published opinion; precedential Mississippi Supreme Court decision.
PARTIES	Darius Parnell Haynes v. State of Mississippi

TOPICS

- criminal procedure
- evidence
- standard of review
- appellate procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the evidence was legally sufficient to support Haynes's conviction for possession of cocaine while in possession of a firearm.

HOLDINGS

1. The evidence was legally sufficient for a rational jury to find beyond a reasonable doubt that Haynes constructively possessed the cocaine.

KEY QUOTATIONS

"This Court reviews de novo a trial court's ruling on the legal sufficiency of the evidence." (250 So. 3d at 1244)

"However, when contraband is found [in a vehicle that is] not owned by a defendant, mere physical proximity to the contraband does not, in itself, show constructive possession." (250 So. 3d at 1245)

"The only question before us on a challenge to the sufficiency of the evidence is whether the jurors could have found the essential elements of the charge beyond a reasonable doubt after viewing the evidence in the light most favorable to the prosecution." (250 So. 3d at 1246)

FACTUAL BACKGROUND

After Haynes fought with Kimmeisha Harris, he left in Xavier Brown's vehicle and was later found sitting in its passenger seat. A small bag containing 0.34 grams of cocaine was in plain view in the ashtray between the seats, next to Haynes. Brown testified that he and Haynes had snorted cocaine from that same package earlier that night, although Brown also claimed the cocaine belonged only to him.

PROCEDURAL HISTORY

A Copiah County Circuit Court jury convicted Haynes of possession of cocaine while in possession of a firearm and possession of a weapon by a felon. The trial court imposed concurrent sentences, denied Haynes's motion for judgment notwithstanding the verdict, and Haynes appealed both counts. On appeal, he challenged only the cocaine-possession conviction; the Supreme Court of Mississippi affirmed that conviction and sentence.

DISPOSITION

affirmed

CASES CITED

- Brooks v. State, 203 So. 3d 1134, 1137 (Miss. 2016)
- Burrows v. State, 961 So. 2d 701, 705 (Miss. 2007)
- Daniels v. State, 742 So. 2d 1140, 1142 (Miss. 1999)

- Wilson v. State, 194 So. 3d 855, 867-68 (Miss. 2016)
- Dees v. State, 126 So. 3d 21, 26 (Miss. 2013)
- Brown v. State, 965 So. 2d 1023, 1030 (Miss. 2007)
- Shelton v. State, 214 So. 3d 250, 256 (Miss. 2017)
- Bush v. State, 895 So. 2d 836, 843 (Miss. 2005)
- Little v. State, 233 So. 3d 288, 291 (Miss. 2017)
- Dixon v. State, 953 So. 2d 1108, 1112-13 (Miss. 2007)
- Wolf v. State, 260 So. 2d 425, 432 (Miss. 1972)
- Hudson v. State, 30 So. 3d 1199, 1203 (Miss. 2010)
- Ferrell v. State, 649 So. 2d 831, 834 (Miss. 1995)
- Harris v. Blackburn, 646 F.2d 904, 906, 908 (5th Cir. 1981)
- Flynt v. State, 183 So. 3d 1, 10 (Miss. 2015)
- Beasley v. State, 136 So. 3d 393, 403 (Miss. 2014)