

COURT OF APPEAL OF LOUISIANA, SECOND CIRCUIT

State of Louisiana v. Cameron Williams

448 So. 2d 753 (2d Cir. 1984) · No. 15681-KA · Decided March 26, 1984

SUMMARY

The Louisiana Court of Appeal, Second Circuit, reviewed Cameron Williams's conviction for battery of a police officer under La. R.S. 14:34.2. The court held that the evidence was sufficient under the Jackson v. Virginia standard and affirmed the conviction and sentence.

CASE DETAILS

COURT	Court of Appeal of Louisiana, Second Circuit
WRITING FOR THE COURT	Norris, Judge; Jasper E. Jones; Norris; McClendon, Judge Pro Tem
JURISDICTION	Louisiana
DECIDED	March 26, 1984
DOCKET	15681-KA
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed his conviction and sentence for battery of a police officer, challenging the sufficiency of the evidence.
STANDARD OF REVIEW	The court viewed the evidence in the light most favorable to the prosecution and asked whether any rational trier of fact could have found the essential elements of the offense beyond a reasonable doubt. The appellate court would not reassess witness credibility or second-guess the trial court's factual determinations beyond the sufficiency review required by Jackson v. Virginia.
PRECEDENTIAL VALUE	Published Louisiana Court of Appeal opinion; precedential within the applicable jurisdiction.
PARTIES	Cameron Williams v. State of Louisiana

TOPICS

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

PRACTICE AREAS

- criminal law
- criminal procedure
- appellate law

QUESTIONS PRESENTED

1. Whether the evidence was sufficient to support Williams's conviction for battery of a police officer under La. R.S. 14:34.2.
2. Whether the appellate court could overturn the conviction by reassessing the credibility of the witnesses.

HOLDINGS

1. The evidence was sufficient because a rational trier of fact, viewing it in the light most favorable to the prosecution, could find beyond a reasonable doubt that Williams committed a nonconsensual battery against a commissioned police officer whom he had reasonable grounds to believe was acting in the performance of his duty.
2. The appellate court may not reverse a conviction merely because the evidence was conflicting or because it might assess witness credibility differently from the trial court.

KEY QUOTATIONS

“Evidence is sufficient to support a conviction when any rational trier of fact, in viewing the evidence in the light most favorable to the prosecution, could have found the essential elements of the crime beyond a reasonable doubt.” (755)

“Because it is the role of the fact finder to weigh the respective credibilities of the witnesses, an appellate court will not second-guess the credibility determinations of the trier of fact beyond the sufficiency evaluations under the Jackson standard of review.” (755)

FACTUAL BACKGROUND

Officer John Oden, working as a security guard and police officer at an apartment complex, responded to a noise complaint and identified himself as a police officer. After Oden arrested Cameron Williams for trespassing and ordered him to leave, Williams threatened Oden and attempted to strike him in the face. Oden deflected the blow, and witnesses gave conflicting accounts about whether Williams struck Oden and whether Williams knew Oden was a police officer. The trial court credited Oden's testimony and convicted Williams of battery of a police officer.

PROCEDURAL HISTORY

After a trial, the trial court found Cameron Williams guilty of battery of a police officer and imposed sentence. Williams appealed to the Louisiana Court of Appeal, Second Circuit, arguing that the evidence was insufficient. The appellate court applied the Jackson v. Virginia standard and affirmed the conviction and sentence.

DISPOSITION

affirmed

CASES CITED

- State v. Richardson, 425 So. 2d 1228 (La. 1983)

- Jackson v. Virginia, 443 U.S. 307, 99 S. Ct. 2781, 61 L. Ed. 2d 560 (1979)
- State ex rel. Graffagnino v. King, 436 So. 2d 559 (La. 1983)

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