

SUPREME COURT OF NEW HAMPSHIRE

State v. Briggs

147 N.H. 431 (2002) · Decided February 11, 2002

SUMMARY

The New Hampshire Supreme Court affirmed the convictions of Daniel, Dana, and Bradley Briggs for obstructing government administration. The court held that sufficient evidence established that the defendants purposely interfered with a fish and game officer performing an official function by blocking his vehicle from leaving their property. The court rejected the defendants’ overbreadth and good-faith property-rights arguments under RSA 642:1.

CASE DETAILS

COURT	Supreme Court of New Hampshire
WRITING FOR THE COURT	Nadeau, J.; Brock, C.J.; Broderick, J.; Dalianis, J.; Duggan, J.
JURISDICTION	New Hampshire
DECIDED	February 11, 2002
DISPOSITION	affirmed
PROCEDURAL POSTURE	The defendants appealed their convictions for obstructing government administration after a bench trial in Auburn District Court.
STANDARD OF REVIEW	For an insufficiency-of-the-evidence challenge, the court asks whether, viewing the evidence in the light most favorable to the State, no rational trier of fact could have found guilt beyond a reasonable doubt.
PRECEDENTIAL VALUE	Published opinion; precedential
PARTIES	Daniel Briggs, Dana Briggs, Bradley Briggs v. State

TOPICS

- criminal procedure
- statutory interpretation
- overbreadth doctrine
- standard of review
- appellate procedure

PRACTICE AREAS

- criminal law
- criminal procedure
- constitutional law
- appellate law

QUESTIONS PRESENTED

1. Whether the evidence was sufficient to prove that each defendant acted purposely to interfere with a public servant.
2. Whether the evidence was sufficient to prove that Officer McKenzie was performing an official function while in the defendants' field and while attempting to leave.
3. Whether RSA 642:1 is unconstitutionally overbroad because it prohibits interference with a public servant who is purporting to perform an official function.
4. Whether RSA 642:1 should contain an exception for a defendant who has a good-faith belief that the public servant has committed or is committing a crime.

HOLDINGS

1. RSA 642:1 requires that the defendants' conscious object be to interfere with the public servant; the defendants' underlying or ultimate motive is irrelevant. The evidence was sufficient for the trial court to find that each defendant acted purposely to prevent Officer McKenzie from moving his truck.
2. The evidence was sufficient for a rational fact-finder to conclude beyond a reasonable doubt that Officer McKenzie was performing an official function while inspecting fields for deer or illegal activity and while attempting to exit the defendants' field.
3. RSA 642:1 is not unconstitutionally overbroad because the defendants had no protected freedom to interfere with an officer performing an official function.
4. RSA 642:1 does not contain a good-faith exception permitting a person to interfere with a law enforcement officer based on the person's belief that the officer has committed or is committing a crime.

KEY QUOTATIONS

“With respect to intent, however, the statute requires only a conscious object to interfere with the public servant; the defendant’s underlying or ultimate motive for doing so is irrelevant.” (434)

“When a landowner learns that the person upon his property is a law enforcement officer, however, the landowner is not entitled to interfere with the officer.” (436)

“A society which seemingly becomes more complex with each passing day is enlightened when its laws reflect a high purpose to have apparent differences between those who wield the authority of government, and those who do not, resolved in the courts or by some other orderly process, rather than by physical confrontation on the street or in the gutter.” (437)

FACTUAL BACKGROUND

New Hampshire Fish and Game Officer James McKenzie was inspecting fields at night before the opening of archery season to check for deer or illegal activity. After the defendants encountered McKenzie in a field, Dana Briggs told him he could not leave until their father arrived and directed Bradley Briggs to block the field exit with a vehicle. Daniel Briggs later arrived, declined or ignored a police officer's order to move the vehicles, and maintained that McKenzie's truck should not be moved, resulting in the defendants' arrests.

PROCEDURAL HISTORY

The defendants were charged, among other offenses, with obstructing government administration under RSA 642:1. Following a bench trial, each defendant was found guilty. The Supreme Court of New Hampshire affirmed, rejecting challenges to the sufficiency of the evidence and to the constitutionality and application of RSA 642:1.

DISPOSITION

affirmed

CASES CITED

- State v. Cort, 145 N.H. 606, 608-09 (2000)
- State v. Kelley, 120 N.H. 14, 17 (1980)
- State v. Patterson, 758 So. 2d 955, 961 (La. Ct. App. 2000), rev'd on other grounds, 783 So. 2d 1243 (La. 2001)
- State v. Pike, 128 N.H. 447, 450-51 (1986)
- State v. Wong, 125 N.H. 610, 622 (1984)
- State v. Haas, 134 N.H. 480, 484 (1991)