

SUPREME COURT OF LOUISIANA

State of Louisiana v. James Taylor

875 So. 2d 58 (La. 2004) · No. 2003-K-1834 · Decided May 25, 2004

SUMMARY

The Supreme Court of Louisiana held that the trial judge did not abuse his discretion in denying the defendant’s challenge for cause to a prospective juror in a second-degree murder case involving a self-defense claim. The court concluded that the juror’s responses, viewed in the context of the entire voir dire, demonstrated a willingness to follow the law and decide the case impartially. The court reversed the court of appeal and reinstated the defendant’s conviction and sentence.

CASE DETAILS

COURT	Supreme Court of Louisiana
WRITING FOR THE COURT	Victory, J.
JURISDICTION	Louisiana
DECIDED	May 25, 2004
DOCKET	2003-K-1834
DISPOSITION	reversed
PROCEDURAL POSTURE	The State sought review of a court of appeal judgment reversing Taylor's conviction and sentence for second-degree murder based on the denial of a challenge for cause to a prospective juror. The Supreme Court of Louisiana granted the State's writ application and reversed the court of appeal.
STANDARD OF REVIEW	A trial court's ruling on a challenge for cause is reviewed for abuse of discretion, based on the voir dire record as a whole.
PRECEDENTIAL VALUE	Published precedential opinion of the Supreme Court of Louisiana
PARTIES	State of Louisiana v. James Taylor

TOPICS

- jury selection
- criminal procedure
- appellate procedure
- standard of review
- self defense

PRACTICE AREAS

- criminal procedure
- appellate procedure
- jury selection
- self-defense

QUESTIONS PRESENTED

1. Whether the trial court abused its discretion by denying Taylor's challenge for cause to prospective juror David Lee Oliver.
2. Whether the denial of the challenge for cause required reversal of Taylor's conviction and sentence after Taylor used a peremptory challenge to remove Oliver and exhausted his peremptory challenges.

HOLDINGS

1. The trial court did not abuse its discretion in denying Taylor's challenge for cause because the voir dire record as a whole showed that Oliver was willing and able to decide the case impartially according to the law and evidence.
2. Reversal based on denial of a challenge for cause requires an erroneous denial and the defendant's exhaustion of all peremptory challenges; because the denial here was not erroneous, reversal was unwarranted.
3. Voir dire does not permit counsel to pose hypothetical questions that demand a prospective juror's commitment or prejudgment regarding evidence or issues to be resolved at trial.

KEY QUOTATIONS

“A trial judge's refusal to excuse a prospective juror for cause is not an abuse of his discretion, notwithstanding that the juror has voiced an opinion seemingly prejudicial to the defense, when subsequently, on further inquiry or instruction, he has demonstrated a willingness and ability to decide the case impartially according to the law and the evidence.” (63)

“voir dire does not encompass unlimited inquiry by defendant into all possible prejudices of prospective jurors, including their opinions on evidence, or its weight, hypothetical questions, or questions of law that call for any prejudgment of supposed facts in the case.” (64)

“Louisiana law clearly establishes that a party interviewing a prospective juror may not ask a question or pose a hypothetical which would demand a commitment or pre-judgment from the juror or which would pry into the juror's opinions about issues to be resolved in the case.” (64)

FACTUAL BACKGROUND

Taylor was charged with second-degree murder after allegedly shooting his co-worker Walter Ray three times at a convenience store following a physical altercation. Taylor claimed self-defense. During voir dire, prospective juror David Lee Oliver made statements suggesting that Taylor would have to prove he could not escape before using deadly force, but Oliver also stated that he could follow Louisiana law, consider the doctrine of justifiable homicide, and apply a reasonable-person standard.

PROCEDURAL HISTORY

Taylor was indicted for second-degree murder, convicted by a twelve-person jury, and sentenced to life imprisonment without benefit of parole, probation, or suspension of sentence. On appeal, he argued that the trial court improperly denied his challenge for cause to prospective juror David Lee Oliver; the court of appeal

agreed and reversed the conviction and sentence. The Louisiana Supreme Court granted the State's writ application, held that the trial court did not abuse its discretion, and reinstated the conviction and sentence.

DISPOSITION

reversed

CASES CITED

- State v. Taylor, 850 So. 2d 5, 19 (La. App. 4 Cir. 2003)
- State v. Taylor, 864 So. 2d 612 (La. 2004)
- State v. Hart, 691 So. 2d 651, 656 (La. 1997)
- State v. Maxie, 653 So. 2d 526, 534 (La. 1995)
- State v. Ball, 824 So. 2d 1089, 1102, 1109-1110 (La. 2002)
- State v. Jacobs, 789 So. 2d 1280, 1283 (La. 2001)
- State v. Taylor, 781 So. 2d 1205 (La. 2001)
- State v. Anthony, 776 So. 2d 376, 391 (La. 2000)
- State v. Cross, 658 So. 2d 683, 686 (La. 1995)
- State v. Robertson, 630 So. 2d 1278, 1280-1281 (La. 1994)
- State v. Brown, 414 So. 2d 726, 728 (La. 1982)
- State v. Williams, 89 So. 2d 898, 905 (La. 1956)
- State v. Smith, 45 So. 2d 617 (La. 1950)
- United States v. Martinez-Salazar, 528 U.S. 304 (2000)