

SUPREME COURT OF NORTH CAROLINA

State v. Hague

No. 225A24 · No. 225A24 · Decided May 22, 2026

SUMMARY

The Supreme Court of North Carolina held that the trial court prejudicially erred by excluding evidence of the victim’s prior felony convictions under North Carolina Rule of Evidence 404(b) when the evidence was offered to support the defendant’s state-of-mind and self-defense claims. The court remanded for a new trial, dismissed review of the stand-your-ground jury-instruction issue as improvidently allowed, and did not reach the sufficiency of the evidence concerning premeditation and deliberation.

CASE DETAILS

COURT	Supreme Court of North Carolina
WRITING FOR THE COURT	Justice Allison Riggs
JURISDICTION	Supreme Court of North Carolina
DECIDED	May 22, 2026
DOCKET	225A24
DISPOSITION	remanded
PROCEDURAL POSTURE	The State appealed by right from a divided Court of Appeals decision, and the Supreme Court granted the defendant's petition for discretionary review on the jury-instruction issue. The Supreme Court reviewed the exclusion of evidence of the victim's prior felony convictions under Rule 404(b), dismissed review of the stand-your-ground instruction issue as improvidently allowed, and declined to reach the sufficiency-of-the-evidence issue.
STANDARD OF REVIEW	The legal conclusion whether evidence falls within Rule 404(b) coverage is reviewed de novo. Prejudice is assessed under N.C.G.S. § 15A-1443(a), with the defendant bearing the burden to show a reasonable possibility of a different result. Rule 403 determinations are reviewed for abuse of discretion.
PRECEDENTIAL VALUE	Published opinion
PARTIES	State of North Carolina v. Blaine Dale Hague

TOPICS

character evidence

self defense

evidence

appellate procedure

standard of review

PRACTICE AREAS

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evidence

criminal procedure

appellate procedure

QUESTIONS PRESENTED

1. Whether the trial court prejudicially erred by excluding evidence of the victim's prior felony convictions under Rule 404(b) when the defendant offered the evidence to establish the reasonableness of his fear and his state of mind in a self-defense claim.
2. Whether the Supreme Court should review the trial court's refusal to give a stand-your-ground jury instruction.
3. Whether the evidence was sufficient to support premeditation and deliberation for first-degree murder.

HOLDINGS

1. Evidence of the victim's prior felony convictions was admissible under Rule 404(b) because Hague offered it to illuminate his state of mind and the reasonableness of his fear in the self-defense encounter, rather than solely to prove that Cass acted in conformity with a criminal character.
2. The exclusion of the prior-conviction evidence was prejudicial because there was a reasonable possibility that the jury would have reached a different result had it heard the evidence and the complete 911 call.
3. The Supreme Court declined to decide whether the evidence should be excluded under Rule 403 and left that determination to the trial court on remand.

KEY QUOTATIONS

“We hold that the trial court prejudicially erred by excluding the Rule 404(b) evidence of Mr. Cass’s prior felony convictions and remand to the trial court for a new trial.” (at 7)

“Rule 404(b) is a “clear general rule of inclusion of relevant evidence of other crimes, wrongs[,] or acts by a defendant.”” (at 9)

“Prior conduct is admissible under Rule 404(b) if it is relevant to the defendant’s state of mind.” (at 10)

“When a defendant alleges self-defense, the “proper inquiry . . . focuses on the reasonableness of defendant’s belief as to the apparent necessity for, and reasonableness of, the force used to repel an attack upon his person.”” (at 13)

“The trial court prejudicially erred by excluding evidence of Mr. Cass’s prior felony convictions under Rule 404(b), so Mr. Hague is entitled to a new trial.” (at 17)

FACTUAL BACKGROUND

Hague, age seventy-one, shot and killed Thomas Cass, age forty-six, in a cornfield after Cass pushed Hague to the ground and then reached toward the pocket area of his vest. Hague claimed he reasonably feared Cass was reaching for a handgun and acted in self-defense. Hague knew Cass was a convicted felon, knew that Cass carried and used firearms, and knew that Cass was hunting with a firearm on the day of the shooting. The trial court excluded evidence of Cass's prior felony convictions, including convictions for cocaine possession and assault inflicting serious bodily injury, and redacted references to those convictions from Hague's 911 call.

PROCEDURAL HISTORY

A jury convicted Hague of first-degree murder and sentenced him to life without parole. The trial court excluded evidence of the victim's prior felony convictions, denied Hague's motion to dismiss, and denied a requested stand-your-ground instruction. The Court of Appeals reversed and vacated the judgment and remanded for a new trial, holding that the trial court erred in denying the motion to dismiss and in excluding the prior-conviction evidence. The Supreme Court affirmed the new-trial result based on the evidentiary error, dismissed the jury-instruction review as improvidently allowed, and did not reach the motion-to-dismiss issue.

DISPOSITION

remanded

REMAND INSTRUCTIONS

Remand for a new trial. On remand, the trial court must determine whether the evidence of Cass's prior felony convictions should nevertheless be excluded under Rule 403. Review of the stand-your-ground instruction issue was dismissed as improvidently allowed, and the sufficiency-of-the-evidence issue was not reached.

CASES CITED

- State v. Beckelheimer, 366 N.C. 127, 130 (2012)
- State v. Pabon, 380 N.C. 241, 258, 260-61 (2022)
- State v. Coffey, 326 N.C. 268, 278-79 (1990)
- State v. Bagley, 321 N.C. 201, 206 (1987)
- State v. Morgan, 315 N.C. 626, 637, 639 (1986)
- State v. Jacobs, 363 N.C. 815, 822-23 (2010)
- State v. Gibson, 333 N.C. 29, 42 (1992)
- State v. Lynch, 334 N.C. 402, 409-10 (1993)
- State v. Weaver, 318 N.C. 400, 403 (1986)
- State v. Smith, 337 N.C. 658, 666 (1994)
- State v. Strickland, 346 N.C. 443, 456 (1997)
- State v. Gladden, 279 N.C. 566 (1971)
- State v. Lee, 370 N.C. 671, 675 (2018)
- State v. Scott, 331 N.C. 39, 46 (1992)

- State v. Gillard, 386 N.C. 797, 811, 816 (2024)
- State v. Carpenter, 361 N.C. 382, 388-89 (2007)
- State v. Richardson, 385 N.C. 101, 133 (2023)
- State v. Bell, 338 N.C. 363, 389 (1994)
- State v. Bass, 371 N.C. 535, 543 (2018)

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