

COURT OF APPEALS FOR THE NINTH DISTRICT OF TEXAS AT BEAUMONT

April Michelle Layland v. State

Layland v. State · No. 09-03-359 CR · Decided August 31, 2004

SUMMARY

The Ninth District Court of Appeals of Texas affirmed April Michelle Layland's misdemeanor driving while intoxicated conviction. The court held that the warrantless arrest was lawful under the totality of the circumstances and that sufficient evidence corroborated Layland's admissions and established that she operated a vehicle while intoxicated.

CASE DETAILS

COURT	Court of Appeals for the Ninth District of Texas at Beaumont
WRITING FOR THE COURT	Per Curiam; McKeithen, C.J.; Burgess; Gaultney
JURISDICTION	Texas
DECIDED	August 31, 2004
DOCKET	09-03-359 CR
DISPOSITION	affirmed
PROCEDURAL POSTURE	Layland appealed her misdemeanor driving-while-intoxicated conviction, challenging the denial of her pretrial motion to suppress and the legal sufficiency of the evidence.
STANDARD OF REVIEW	For the motion to suppress, the court applied a bifurcated standard: it gave almost total deference to historical-fact findings and credibility- and demeanor-dependent application-of-law-to-fact determinations, while reviewing mixed questions of law and fact de novo when they did not turn on credibility or demeanor. For legal sufficiency, the court viewed all evidence in the light most favorable to the verdict and asked whether any rational trier of fact could have found the essential elements beyond a reasonable doubt.
PRECEDENTIAL VALUE	Published Texas intermediate appellate opinion; precedential value is not otherwise specified in the opinion text.
PARTIES	April Michelle Layland v. The State of Texas

TOPICS

suppression of evidence

criminal procedure

probable cause

appellate procedure

evidence

PRACTICE AREAS

criminal law

criminal procedure

appellate litigation

QUESTIONS PRESENTED

1. Whether the trial court erred in denying Layland's motion to suppress statements obtained after her return to the accident scene and subsequent custody, on the grounds that her arrest was unlawful and lacked probable cause or a statutory basis for a warrantless arrest.
2. Whether the evidence was legally sufficient to corroborate Layland's extrajudicial admissions and establish that she operated a motor vehicle in a public place while intoxicated.

HOLDINGS

1. The trial court did not err in denying the motion to suppress because Layland voluntarily returned to the accident scene, was free to leave until formally taken into custody, and the totality of the circumstances established a suspicious place and probable cause for the warrantless arrest.
2. The evidence was legally sufficient because independent evidence corroborated Layland's admissions and enabled the jury to rationally find beyond a reasonable doubt that she operated a motor vehicle in a public place while intoxicated.

KEY QUOTATIONS

"We apply a bifurcated standard of review to a trial court's ruling on a motion to suppress evidence."
(opinion text)

"As long as there is some evidence corroborating the confession, the confession may be used to aid in the establishment of the corpus delicti." (opinion text)

"Under the totality of the circumstances, the facts make the location a 'suspicious place,' and also provided probable cause to believe that the appellant had been drinking and driving." (opinion text)

FACTUAL BACKGROUND

Deputy Judd Russell responded to a single-vehicle accident and found Layland's Toyota Corolla in a ditch with its tires spinning and engine running. Layland returned to the scene with her husband, displayed signs of intoxication, failed field-sobriety tests, and admitted she had been driving; later, at the jail, she admitted drinking before the accident and stated that she had intentionally driven off the road. The vehicle contained alcohol containers, and breath tests produced results of .216 and .229.

PROCEDURAL HISTORY

A jury found Layland guilty of misdemeanor driving while intoxicated. The County Court at Law No. 1 of Montgomery County assessed 180 days in jail, probated for eighteen months, and a \$500 fine. The Court of Appeals affirmed the trial court's judgment.

DISPOSITION

affirmed

CASES CITED

- Carmouche v. State, 10 S.W.3d 323, 327 (Tex. Crim. App. 2000)
- Guzman v. State, 955 S.W.2d 85, 89 (Tex. Crim. App. 1997)
- Johnson v. State, 68 S.W.3d 644, 652-53 (Tex. Crim. App. 2002)
- Dyar v. State, 125 S.W.3d 460, 462-68 (Tex. Crim. App. 2003)
- Jackson v. Virginia, 443 U.S. 307, 319, 99 S. Ct. 2781, 61 L. Ed. 2d 560 (1979)
- Self v. State, 513 S.W.2d 832, 835 (Tex. Crim. App. 1974)
- Threet v. State, 157 Tex. Crim. 497, 250 S.W.2d 200 (1952)
- Zavala v. State, 89 S.W.3d 134, 139 (Tex. App.—Corpus Christi 2002, no pet.)
- Miranda v. Arizona, 384 U.S. 436, 86 S. Ct. 1602, 16 L. Ed. 2d 694 (1966)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/state/texas-court-of-appeals-for-the-ninth-district-of-texas-at-beaumont/2004/april-michelle-layland-v-state-4gbqtxfg>