

SUPREME COURT OF APPEALS OF WEST VIRGINIA

State v. Headley, 210 W. Va. 524

558 S.E.2d 324 (2001) · No. No. 29065 · Decided November 28, 2001

SUMMARY

The Supreme Court of Appeals of West Virginia reversed Frances Martha Headley's involuntary manslaughter conviction arising from the stabbing death of Brian M. Evans. The court held that Headley presented sufficient evidence of self-defense, that the State failed to prove beyond a reasonable doubt that she did not act in self-defense, and that she was entitled to a judgment of acquittal. The court also discussed the trial court's obligation to instruct the jury on a supported theory of self-defense.

CASE DETAILS

COURT	Supreme Court of Appeals of West Virginia
WRITING FOR THE COURT	Per Curiam
JURISDICTION	West Virginia
DECIDED	November 28, 2001
DOCKET	No. 29065
DISPOSITION	vacated
PROCEDURAL POSTURE	Headley appealed her conviction for involuntary manslaughter and the associated restitution order after the Circuit Court of Wood County refused to permit her to present evidence, expert testimony, and jury instructions supporting self-defense.
STANDARD OF REVIEW	The court reviewed the sufficiency of the evidence by viewing the evidence in the light most favorable to the prosecution and asking whether any rational trier of fact could have found the essential elements proved beyond a reasonable doubt.
PRECEDENTIAL VALUE	Published opinion; precedential
PARTIES	Frances Martha Headley v. State of West Virginia

TOPICS

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

PRACTICE AREAS

criminal law

criminal procedure

evidence

self-defense

jury instructions

QUESTIONS PRESENTED

1. Whether the evidence was sufficient to prove beyond a reasonable doubt that Headley did not act in self-defense when she used deadly force against Evans.
2. Whether Headley was entitled to present evidence and receive jury instructions supporting her theory of self-defense when competent evidence supported that theory.

HOLDINGS

1. Once Headley presented sufficient evidence to create a reasonable doubt that the killing resulted from self-defense, the State was required to prove beyond a reasonable doubt that she did not act in self-defense. The State failed to meet that burden, and Headley was entitled to acquittal.
2. When competent evidence tends in any appreciable degree to support a defendant's theory of self-defense, the trial court must permit the defendant to present that theory and give a correct instruction on it when requested, even if the evidence is slight.

KEY QUOTATIONS

“Therefore, Ms. Headley was not engaged in an unlawful act when she caused the death of Mr. Evans.” (327)

“Once there is sufficient evidence to create a reasonable doubt that the killing resulted from the defendant acting in self-defense, the prosecution must prove beyond a reasonable doubt that the defendant did not act in self-defense.” (328)

“Even where the evidence is scant, the trial court has a duty to allow a defendant to get her theory before the jury.” (329)

“The case is remanded for an entry of a judgment of acquittal.” (329)

FACTUAL BACKGROUND

Headley and Evans lived together and had a documented history of domestic violence. On October 6, 1998, after both had been drinking and arguing, Evans attacked Headley, wrestled her to the ground, punched her in the face and head, and broke her nose. Headley retreated to the kitchen, armed herself with a knife, warned Evans not to approach, and stabbed him when he continued toward her; Evans later died from the stab wounds.

PROCEDURAL HISTORY

Headley was indicted for murder after stabbing Brian M. Evans, who later died. A jury found her guilty of involuntary manslaughter, and the circuit court sentenced her to one year in the county correctional center and ordered restitution of \$187,209.29. The Supreme Court of Appeals of West Virginia held that the evidence established self-defense and that the State failed to disprove self-defense beyond a reasonable doubt, vacated the conviction and sentence, and remanded for entry of a judgment of acquittal.

DISPOSITION

vacated

REMAND INSTRUCTIONS

Remand for entry of a judgment of acquittal. No retrial is permitted.

CASES CITED

- State v. Guthrie, 194 W. Va. 657, 461 S.E.2d 163 (1995)
- State v. Barker, 128 W. Va. 744, 38 S.E.2d 346 (1946)
- State v. W.J.B., 166 W. Va. 602, 276 S.E.2d 550 (1981)
- State v. Kirtley, 162 W. Va. 249, 252 S.E.2d 374 (1978)
- State v. Bowyer, 143 W. Va. 302, 101 S.E.2d 243 (1957)
- State v. Foley, 128 W. Va. 166, 35 S.E.2d 854 (1945)
- State v. Alie, 82 W. Va. 601, 96 S.E. 1011 (1918)
- Snedeker v. Rulong, 69 W. Va. 223, 71 S.E. 180 (1911)
- Moran v. Atha Trucking, Inc., 208 W. Va. 379, 540 S.E.2d 903 (2001)
- State v. Baker, 177 W. Va. 769, 356 S.E.2d 862 (1987)
- State v. McMillion, 104 W. Va. 1, 138 S.E. 732 (1927)
- Danco, Inc. v. Donahue, 176 W. Va. 57, 341 S.E.2d 676 (1985)
- State v. Betsall, 11 W. Va. 703 (1877)
- State v. Humphreys, 128 W. Va. 370, 36 S.E.2d 469 (1945)
- People v. Burns, 88 Cal. App. 2d 867, 200 P.2d 134 (1948)
- State v. Cook, 204 W. Va. 591, 515 S.E.2d 127 (1999)