

SUPREME COURT OF MINNESOTA

State v. Hayes

831 N.W.2d 546 (Minn. 2013) · Decided May 31, 2013

SUMMARY

The Minnesota Supreme Court affirmed Donald W. Hayes’s convictions for first-degree domestic-abuse murder and second-degree murder arising from the death of a 13-month-old child. The court held that the evidence was sufficient to establish an intentional assault causing death and a past pattern of domestic abuse, and that the jury instructions did not improperly omit requirements concerning proof of prior acts or unanimity regarding the specific acts constituting the pattern.

CASE DETAILS

COURT	Supreme Court of Minnesota
WRITING FOR THE COURT	G. Barry Anderson
JURISDICTION	Minnesota
DECIDED	May 31, 2013
DISPOSITION	affirmed
PROCEDURAL POSTURE	Direct appeal from convictions for first-degree domestic-abuse murder and second-degree felony murder.
STANDARD OF REVIEW	Sufficiency of the evidence is reviewed by viewing the evidence in the light most favorable to the verdict and, for circumstantial evidence, applying a two-step analysis: the court defers to the circumstances proved by the jury and independently examines whether the reasonable inferences are consistent with guilt and inconsistent with any rational hypothesis other than guilt. Unobjected-to jury instructions are reviewed for plain error. The district court has broad discretion in determining jury instructions, which are reviewed as a whole for whether they fairly and correctly state the applicable law.
PRECEDENTIAL VALUE	Published precedential opinion of the Supreme Court of Minnesota
PARTIES	Donald W. Hayes v. State of Minnesota

TOPICS

- criminal procedure
- evidence
- statutory interpretation
- jury instructions
- burden of proof

PRACTICE AREAS

Criminal law

Criminal procedure

Evidence

QUESTIONS PRESENTED

1. Whether the evidence was sufficient to prove that Hayes intentionally assaulted Robert and caused his death.
2. Whether the evidence was sufficient to prove that Hayes had engaged in a past pattern of domestic abuse.
3. Whether the district court plainly erred by failing to instruct the jury that the State had to prove at least two prior acts of domestic abuse beyond a reasonable doubt.
4. Whether the district court plainly erred by failing to instruct the jury that it had to unanimously agree on which specific acts constituted the past pattern of domestic abuse.

HOLDINGS

1. The evidence was sufficient to prove beyond a reasonable doubt that Hayes caused Robert's death while committing an intentional assault.
2. The evidence was sufficient to establish that Hayes had engaged in a past pattern of domestic abuse for purposes of first-degree domestic-abuse murder.
3. The district court did not plainly err by failing to give a separate instruction stating that at least two prior acts of domestic abuse had to be proven beyond a reasonable doubt.
4. The jury was not required to unanimously agree on which specific acts comprised the past pattern of domestic abuse.

KEY QUOTATIONS

"We conclude that jurors are not required to unanimously agree on which acts comprised the past pattern of domestic abuse." (556)

"The second step requires us to determine whether the circumstances proved are consistent with guilt and inconsistent with any rational hypothesis other than [Hayes's] guilt." (553)

FACTUAL BACKGROUND

Thirteen-month-old Robert Azure, Jr., was in Hayes's care when he suffered severe head trauma and became nearly comatose. Hayes claimed that he tripped over a fan or its cord while carrying Robert, but medical experts testified that Robert's multiple skull injuries and other injuries were too severe to have resulted from an ordinary household fall. Robert later died from complications of blunt-force craniocerebral injuries, and the medical examiner classified the manner of death as homicide. The State also presented evidence that Hayes had committed multiple prior acts of domestic abuse against A.A., with whom he had a child in common.

PROCEDURAL HISTORY

A jury found Hayes guilty of first-degree murder while committing domestic abuse with a past pattern of domestic abuse and second-degree murder while committing a felony. The district court sentenced him to life imprisonment without the possibility of release. Hayes appealed directly, challenging the sufficiency of the evidence and the jury instructions concerning the past pattern of domestic abuse and jury unanimity.

DISPOSITION

affirmed

CASES CITED

- State v. Holliday, 745 N.W.2d 556, 562 (Minn. 2008)
- State v. Leake, 699 N.W.2d 312, 319 (Minn. 2005)
- State v. Anderson, 789 N.W.2d 227, 241-42 (Minn. 2010)
- State v. Andersen, 784 N.W.2d 320, 329-31 (Minn. 2010)
- State v. Al-Naseer, 788 N.W.2d 469, 473-74 (Minn. 2010)
- State v. McArthur, 730 N.W.2d 44, 49 (Minn. 2007)
- State v. Johnson, 773 N.W.2d 81, 86 (Minn. 2009)
- State v. Grube, 531 N.W.2d 484, 491 (Minn. 1995)
- State v. Robinson, 539 N.W.2d 231, 237 (Minn. 1995)
- State v. Her, 750 N.W.2d 258, 278 (Minn. 2008)
- State v. Laine, 715 N.W.2d 425, 432 (Minn. 2006)
- State v. Griller, 583 N.W.2d 736, 740-41 (Minn. 1998)
- State v. Ramey, 721 N.W.2d 294, 302 (Minn. 2006)
- State v. Baird, 654 N.W.2d 105, 113 (Minn. 2002)
- Stewart v. Koenig, 783 N.W.2d 164, 166 (Minn. 2010)
- Hilligoss v. Cargill, Inc., 649 N.W.2d 142, 147 (Minn. 2002)
- State v. Hokanson, 821 N.W.2d 340, 356-57 (Minn. 2012)
- State v. Crowsbreast, 629 N.W.2d 433, 439 (Minn. 2001)
- Schad v. Arizona, 501 U.S. 624, 631-32 (1991)