

SUPREME COURT OF INDIANA

Pratt v. State

744 N.E.2d 434 (Ind. 2001) · No. 49S00-0004-CR-265 · Decided March 27, 2001

SUMMARY

The Indiana Supreme Court affirmed Ryan Pratt's convictions for murder, battery, and neglect of a dependent arising from the fatal blunt-force trauma inflicted on his eleven-month-old son. The court held that circumstantial evidence, including Pratt's exclusive presence with the child, the timing and pattern of the injuries, and the apnea-monitor readings, was sufficient to support the murder conviction. The court also rejected or waived related arguments concerning the source of the injuries, the preservation of potentially useful evidence, and the knowing mental state.

CASE DETAILS

COURT	Supreme Court of Indiana
WRITING FOR THE COURT	Justice Boehm; Boehm; Shepard, C.J.; Dickson; Sullivan; Rucker
JURISDICTION	Indiana
DECIDED	March 27, 2001
DOCKET	49S00-0004-CR-265
DISPOSITION	affirmed
PROCEDURAL POSTURE	Direct appeal from convictions for murder, battery, and neglect of a dependent and a sixty-year sentence. The appellant challenged the sufficiency of the evidence supporting the murder and battery convictions.
STANDARD OF REVIEW	On a sufficiency-of-the-evidence claim, the court neither reweighs the evidence nor judges witness credibility. It considers the evidence and reasonable inferences supporting the verdict and affirms if evidence of probative value permits a jury to find guilt beyond a reasonable doubt.
PRECEDENTIAL VALUE	Published precedential opinion of the Supreme Court of Indiana
PARTIES	Ryan Pratt v. State of Indiana

TOPICS

- evidence
- appellate procedure
- standard of review
- criminal procedure
- preservation of error

PRACTICE AREAS

criminal law

criminal procedure

appellate practice

QUESTIONS PRESENTED

1. Whether sufficient evidence supported Pratt's murder conviction when no eyewitness testified that he struck Dylan.
2. Whether sufficient evidence supported the merged battery conviction.
3. Whether the State's failure to preserve the telephone for fingerprint or tissue analysis violated due process.

HOLDINGS

1. The evidence was sufficient to support Pratt's murder conviction because the circumstantial evidence and reasonable inferences permitted a reasonable jury to find beyond a reasonable doubt that Pratt caused Dylan's fatal injuries.
2. The court did not separately address the sufficiency of the battery conviction because the trial court merged that conviction into the murder conviction.
3. Pratt did not establish a due-process violation based on the State's failure to preserve the telephone because the telephone was merely potentially useful evidence and he did not show bad faith.

KEY QUOTATIONS

"When reviewing a claim of sufficiency of the evidence, we do not reweigh the evidence or judge the credibility of witnesses." (436)

"Although any one of these items alone does not establish that Pratt murdered Dylan, taken together with the reasonable inferences therefrom, there is sufficient evidence from which a reasonable jury could have found Pratt guilty." (437)

FACTUAL BACKGROUND

Pratt's eleven-month-old son, Dylan, suffered from severe congenital conditions and was hospitalized in a Parent Care Unit. Pratt was alone with Dylan on the night before Dylan was found gravely injured; the apnea monitor was turned off for much of that night. The next morning, medical personnel found Dylan with bruises on his head, back, and buttocks, and the head bruising was consistent with a telephone found in the room. Dylan later died from blunt-force trauma to the head, and medical evidence indicated that the injuries occurred while Pratt was alone with him.

PROCEDURAL HISTORY

Pratt was convicted in the trial court of murder, battery, and neglect of a dependent after his eleven-month-old son died from blunt-force trauma to the head. The trial court merged the battery conviction into the murder conviction and sentenced Pratt to sixty years for murder, concurrent with three years for neglect of a dependent. The Indiana Supreme Court affirmed on direct appeal.

DISPOSITION

affirmed

CASES CITED

- Spurlock v. State, 675 N.E.2d 312, 314 (Ind. 1996)
- Roop v. State, 730 N.E.2d 1267, 1270-1271 (Ind. 2000)
- Wilson v. State, 455 N.E.2d 1120, 1122 (Ind. 1983)
- Bonds v. State, 721 N.E.2d 1238, 1242 (Ind. 1999)
- Cutter v. State, 725 N.E.2d 401, 407 n.2 (Ind. 2000)
- Jackson v. State, 728 N.E.2d 147, 153 (Ind. 2000)
- Samek v. State, 688 N.E.2d 1286, 1288 (Ind. Ct. App. 1997)