

SUPREME COURT OF NORTH DAKOTA

State of North Dakota v. Michael James Landen

2026 ND 38 · No. No. 20250305 · Decided February 12, 2026

SUMMARY

The North Dakota Supreme Court affirmed Michael James Landen’s criminal judgment after a jury found him guilty of terrorizing. The court held that sufficient evidence supported the conviction and summarily affirmed under North Dakota Rule of Appellate Procedure 35.1(a)(3).

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                   |
|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | Supreme Court of North Dakota                                                                                                                                                                                                                                                     |
| WRITING FOR THE COURT | Per Curiam; Lisa Fair McEvers, C.J.; Daniel J. Crothers; Jerod E. Tufte; Jon J. Jensen; Douglas A. Bahr                                                                                                                                                                           |
| JURISDICTION          | Supreme Court of North Dakota                                                                                                                                                                                                                                                     |
| DECIDED               | February 12, 2026                                                                                                                                                                                                                                                                 |
| DOCKET                | No. 20250305                                                                                                                                                                                                                                                                      |
| DISPOSITION           | affirmed                                                                                                                                                                                                                                                                          |
| PROCEDURAL POSTURE    | Landen appealed a criminal judgment entered after a jury found him guilty of terrorizing, arguing the trial evidence was insufficient to sustain the conviction.                                                                                                                  |
| STANDARD OF REVIEW    | The court reviewed whether the evidence was sufficient to support the guilty verdict, applying the rule that the defendant must show the evidence permits no reasonable inference of guilt and that the court does not reweigh conflicting evidence or judge witness credibility. |
| PRECEDENTIAL VALUE    | Published and precedential                                                                                                                                                                                                                                                        |
| PARTIES               | Michael James Landen v. State of North Dakota                                                                                                                                                                                                                                     |

TOPICS

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

PRACTICE AREAS

- criminal procedure
- appellate procedure
- criminal evidence

## QUESTIONS PRESENTED

1. Whether the evidence presented at trial was sufficient to sustain Landen's terrorizing conviction.

## HOLDINGS

1. The evidence was sufficient to support the guilty verdict because Landen did not establish that the evidence permitted no reasonable inference of guilt.

## KEY QUOTATIONS

*"stating the defendant must show the evidence permits no reasonable inference of guilt and we do not reweigh conflicting evidence or judge witness credibility"* (§ 2)

## FACTUAL BACKGROUND

The trial evidence included a recording of the 911 call and body-camera footage of the incident underlying the terrorizing charge. The responding officer, the victim, and the victim's brother testified about Landen's conduct. The victim testified that Landen's conduct caused the victim to be fearful.

## PROCEDURAL HISTORY

A jury found Landen guilty of terrorizing. The district court denied his motion for judgment of acquittal under Rule 29, N.D.R.Crim.P. Landen appealed, and the North Dakota Supreme Court summarily affirmed.

## DISPOSITION

affirmed

## CASES CITED

- State v. Haney, 2023 ND 227, ¶ 7, 998 N.W.2d 817