

SUPREME COURT OF WYOMING

Edwards v. State

167 P.3d 636 (Wyo. 2007) · No. 2007 WY 146 · Decided September 18, 2007

SUMMARY

The Wyoming Supreme Court held that the trial court improperly excluded testimony concerning the deceased passenger's prior conduct of grabbing a vehicle's steering wheel while intoxicated. The evidence was relevant to Edwards's defense that the passenger's conduct, rather than Edwards's wrongful conduct, was the proximate cause of the fatal accident, so the conviction was reversed and the case remanded.

CASE DETAILS

COURT	Supreme Court of Wyoming
WRITING FOR THE COURT	Golden, Justice; Burke; Golden; Hill; Kite; Voigt
JURISDICTION	Wyoming
DECIDED	September 18, 2007
DOCKET	2007 WY 146
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Defendant appealed his conviction and sentence for aggravated vehicular homicide, asserting that the district court improperly excluded evidence relevant to his causation defense.
STANDARD OF REVIEW	Evidentiary rulings, including determinations concerning foundation, relevance, competency, materiality, and remoteness, are reviewed for abuse of discretion. The defendant bears the burden of establishing that the trial court's choice was unreasonable, arbitrary, or capricious.
PRECEDENTIAL VALUE	Published Wyoming Supreme Court opinion; precedential
PARTIES	Cody Edwards v. State of Wyoming

TOPICS

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

PRACTICE AREAS

- Evidence
- Criminal law
- Appellate procedure

QUESTIONS PRESENTED

1. Whether the district court erred by excluding testimony that the victim previously grabbed a driver's steering wheel under similar circumstances, where the evidence was offered to support Edwards's defense that the victim caused the accident.
2. Whether the excluded evidence was relevant and admissible under Wyoming Rules of Evidence 404 and 403.

HOLDINGS

1. Evidence of a victim's prior conduct is relevant when the conduct bears on the defendant's alleged wrongful conduct or on whether that conduct was the proximate cause of the victim's death. The testimony that Southworth previously grabbed another driver's steering wheel under similar circumstances was crucial to Edwards's causation defense and was improperly excluded.
2. The district court abused its discretion by excluding Demel's testimony concerning Southworth's prior steering-wheel interference.

KEY QUOTATIONS

“Evidence of a victim's actions is relevant whenever those actions have a bearing on the defendant's alleged wrongful conduct or in determining whether the defendant's wrongful conduct was the proximate cause of a victim's death.” (167 P.3d at 639)

“The evidence of Southworth's prior actions was crucial to Edwards' defense that his conduct was not the proximate cause of the accident and Southworth's death.” (167 P.3d at 639)

FACTUAL BACKGROUND

Edwards and David Southworth were injured in a single-vehicle rollover crash on Interstate 25 in Casper, Wyoming; Southworth died from his injuries. Both men were highly intoxicated, and Edwards did not dispute that he was driving. Edwards's defense focused on causation: he claimed that Southworth, who was drunk and depressed, grabbed the steering wheel and caused the crash. Edwards sought to introduce antidepressant medication found among Southworth's belongings and testimony that Southworth had previously grabbed another driver's steering wheel while drunk and depressed, but the district court excluded the evidence.

PROCEDURAL HISTORY

After a four-day trial, a jury found Edwards guilty of aggravated vehicular homicide. The district court sentenced him to eight to fourteen years' imprisonment. Edwards appealed, and the Wyoming Supreme Court reversed and remanded because the trial court improperly excluded testimony concerning the victim's prior conduct.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remanded for further proceedings consistent with the opinion.

CASES CITED

- Gabbert v. State, 2006 WY 108, ¶ 24, 141 P.3d 690, 697 (Wyo. 2006)
- Brown v. State, 2005 WY 37, ¶ 12, 109 P.3d 52, 56 (Wyo. 2005)
- Farmer v. State, 2005 WY 162, ¶ 8, 124 P.3d 699, 703 (Wyo. 2005)
- Holloman v. State, 2005 WY 25, ¶ 10, 106 P.3d 879, 883 (Wyo. 2005)
- State v. Young, 48 Wash. App. 406, 739 P.2d 1170 (1987)
- Glazier v. State, 843 P.2d 1200, 1204 (Wyo. 1992)
- Buckles v. State, 830 P.2d 702, 706-708 (Wyo. 1992)
- Bloomquist v. State, 914 P.2d 812, 820 (Wyo. 1996)
- Calbom v. Knudtson, 65 Wash. 2d 157, 168, 396 P.2d 148 (1964)
- State v. Dinges, 48 Wash. 2d 152, 292 P.2d 361 (1956)
- State v. Brown, 30 Wash. App. 344, 633 P.2d 1351 (1981)
- State v. Fernandes, 28 Wash. App. 944, 628 P.2d 818 (1980)
- State v. Bloomstrom, 12 Wash. App. 416, 529 P.2d 1124 (1974)
- State v. Messinger, 8 Wash. App. 829, 509 P.2d 382 (1973)
- State v. Moxley, 6 Wash. App. 153, 491 P.2d 1326 (1971)
- State v. Stationak, 1 Wash. App. 558, 463 P.2d 260 (1969)
- State v. Chapman, 209 Mont. 57, 679 P.2d 1210 (1984)
- State v. Wixon, 30 Wash. App. 63, 631 P.2d 1033 (1981)
- United States v. Dennis, 625 F.2d 782 (8th Cir. 1980)
- United States v. Wasman, 641 F.2d 326 (5th Cir. 1981)