

SUPREME COURT OF IOWA

State of Iowa v. Jeffrey Lee Stendrup

Stendrup · No. No. 21–1043 · Decided December 22, 2022

SUMMARY

The Iowa Supreme Court affirmed Jeffrey Lee Stendrup’s convictions for first-degree murder and first-degree robbery arising from his beating of Jeremy McDowell during a robbery. The court held that the evidence was sufficient to establish Stendrup’s intent to commit theft and his responsibility for McDowell’s death, despite McDowell’s methamphetamine use and underlying health conditions. The court also concluded that the district court improperly limited expert testimony concerning the cause and manner of death, but that the record supported the convictions.

CASE DETAILS

COURT	Supreme Court of Iowa
WRITING FOR THE COURT	McDonald, Justice; all justices joined
JURISDICTION	Iowa
DECIDED	December 22, 2022
DOCKET	No. 21–1043
DISPOSITION	affirmed
PROCEDURAL POSTURE	Direct appeal from bench-trial convictions for first-degree murder, under a felony-murder theory with first-degree robbery as the predicate felony, and first-degree robbery. The defendant challenged the sufficiency and weight of the evidence and the admission and limitation of expert evidence concerning the victim's cause and manner of death.
STANDARD OF REVIEW	Evidentiary rulings are reviewed for abuse of discretion. Sufficiency of the evidence is reviewed for correction of legal error, viewing the evidence in the light most favorable to the State and upholding the finding if supported by substantial evidence. A ruling on a motion for new trial based on the weight of the evidence is reviewed for abuse of discretion, with reversal only for a clear and manifest abuse of discretion.
PRECEDENTIAL VALUE	Published opinion; precedential
PARTIES	Jeffrey Lee Stendrup v. State of Iowa

TOPICS

criminal procedure evidence appellate procedure standard of review

PRACTICE AREAS

Criminal law Criminal procedure Evidence Appellate practice

QUESTIONS PRESENTED

1. Whether the district court abused its discretion by limiting expert and autopsy evidence concerning the cause and manner of McDowell's death.
2. Whether substantial evidence supported the finding that Stendrup had the specific intent to commit theft necessary for first-degree robbery.
3. Whether substantial evidence supported a finding that Stendrup's assault was a factual, or but-for, cause of McDowell's death.
4. Whether the district court abused its discretion in denying Stendrup's motion for a new trial based on the weight of the evidence.

HOLDINGS

1. The district court abused its discretion by requiring redaction of the autopsy report and limiting the medical examiner's testimony concerning the cause and manner of McDowell's death. The court correctly allowed the expert to answer hypothetical questions based on facts supported by the record.
2. Substantial evidence supported the finding that Stendrup had the specific intent to commit theft, and the fact that he did not successfully take property did not defeat the robbery convictions.
3. Iowa law requires proof that the defendant's conduct was a factual, or but-for, cause of the victim's death. Substantial evidence established that Stendrup's assault was a but-for cause of McDowell's death.
4. The court did not need to decide whether to adopt the civil scope-of-liability standard in criminal cases because, for felony murder, the legislature has determined that commission of a dangerous predicate felony causing death establishes liability without regard to the defendant's intent to cause death.
5. The district court did not abuse its discretion in denying Stendrup's motion for a new trial based on the weight of the evidence.

KEY QUOTATIONS

“When the testimony is viewed in the light most favorable to the State, there is substantial evidence Stendrup’s physical assault of McDowell was a factual or but-for cause of McDowell’s death.” (at 23)

“When a person engages in conduct dangerous enough to serve as a predicate felony for felony murder, as Stendrup did here, and when the person’s conduct is the factual cause of the death of another while participating in the predicate felony, as Stendrup’s was here, then the legislature has already determined as a policy matter that the person is guilty of murder in the first degree without regard to intent.” (at 25)

FACTUAL BACKGROUND

During a dispute involving stolen property, Jeffrey Stendrup went to a residence where Jeremy McDowell was present, entered with a bat, demanded his property, and repeatedly beat McDowell. McDowell, a chronic methamphetamine user with coronary artery disease and pulmonary emphysema, became unresponsive during or immediately after the assault and died from sudden cardiac arrhythmia in the setting of methamphetamine toxicity and the altercation. Evidence included witness testimony, phone records, Stendrup's statements, blood and fingerprint evidence on the bat, and expert testimony that the assault was a factual cause of death.

PROCEDURAL HISTORY

Stendrup was charged with, among other offenses, first-degree murder and first-degree robbery. After his trial was severed from codefendant Sheeder's, Stendrup waived a jury and proceeded to a bench trial; he also pleaded guilty to suborning perjury and witness tampering. The district court found him guilty of first-degree murder and first-degree robbery, imposed life imprisonment without parole for murder and twenty-five years for robbery, and denied his motion for a new trial. The Supreme Court of Iowa affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Sheeder, No. 19–1716, 2021 WL 4891014, at *1, *6 (Iowa Ct. App. Oct. 20, 2021)
- State v. Tyler, 867 N.W.2d 136, 143–77 (Iowa 2015)
- State v. Lacey, 968 N.W.2d 792, 805 (Iowa 2021)
- Ranes v. Adams Laboratories, Inc., 778 N.W.2d 677, 685 (Iowa 2010)
- State v. Buller, 517 N.W.2d 711, 713 (Iowa 1994)
- United States v. Cyphers, 553 F.2d 1064, 1072–73 (7th Cir. 1977)
- State v. Boner, 203 N.W.2d 198, 200 (Iowa 1972)
- State v. Mathis, 971 N.W.2d 514, 516 (Iowa 2022)
- State v. Abbas, 561 N.W.2d 72, 74 (Iowa 1997) (per curiam)
- State v. Tipton, 897 N.W.2d 653, 692 (Iowa 2017)
- State v. Miller, 622 N.W.2d 782, 785–86 (Iowa Ct. App. 2000)
- State v. Worthen, 82 N.W. 910, 911 (Iowa 1900)
- State v. Rockingham, No. 15–0978, 2016 WL 6652350, at *6 (Iowa Ct. App. Nov. 9, 2016)
- State v. Smith, 34 N.W. 597, 601–02 (Iowa 1887)
- State v. Baldes, 110 N.W. 440, 442 (Iowa 1907)
- State v. O'Brien, 46 N.W. 752, 753 (Iowa 1890)
- Burrage v. United States, 571 U.S. 204, 208–09 (2014)
- State v. Tribble, 790 N.W.2d 121, 127–28 (Iowa 2010)
- State v. Tyler, 873 N.W.2d 741, 748 (Iowa 2016)
- State v. Hennings, 791 N.W.2d 828, 836–37 (Iowa 2010)

- State v. Marti, 290 N.W.2d 570, 584–85 (Iowa 1980)
- State v. Hill, 878 N.W.2d 269 (Iowa 2016)
- State v. Garcia, 616 N.W.2d 594, 596 (Iowa 2000) (en banc)
- State v. Roache, 920 N.W.2d 93, 101–02 (Iowa 2018)
- State v. Harrison, 914 N.W.2d 178, 191–92 (Iowa 2018)
- Benn v. Thomas, 512 N.W.2d 537, 539 (Iowa 1994)
- State v. Ellis, 578 N.W.2d 655, 658–59 (Iowa 1998)
- State v. Grant, 722 N.W.2d 645, 649 (Iowa 2006)
- State v. Ary, 877 N.W.2d 686, 705–06 (Iowa 2016)
- State v. Reeves, 670 N.W.2d 199, 203 (Iowa 2003)
- State v. Neiderbach, 837 N.W.2d 180, 211–12, 216 (Iowa 2013)
- State v. Wickes, 910 N.W.2d 554, 571 (Iowa 2018)