

SUPREME COURT OF LOUISIANA

State of Louisiana v. Quint Mire

269 So. 3d 698 (La. 2016) · No. 2014-K-2295 · Decided January 27, 2016

SUMMARY

The Supreme Court of Louisiana reversed the court of appeal and reinstated Quint Mire’s conviction for second degree murder and life sentence without parole eligibility. The court held that the evidence, including Mire’s repeated shots, concealment efforts, contentious relationship with the victim, and subsequent conduct, was sufficient for a rational jury to find specific intent to kill or inflict great bodily harm under Jackson v. Virginia. The court also explained that motive is not an element of second degree murder and that the court of appeal improperly substituted its assessment of the evidence for that of the jury.

CASE DETAILS

COURT	Supreme Court of Louisiana
WRITING FOR THE COURT	Per Curiam
JURISDICTION	Louisiana
DECIDED	January 27, 2016
DOCKET	2014-K-2295
DISPOSITION	reversed
PROCEDURAL POSTURE	The State sought review by writ of certiorari after the Louisiana Third Circuit Court of Appeal vacated defendant's second-degree-murder conviction, entered a negligent-homicide judgment, and remanded for sentencing on the ground that the evidence did not establish specific intent.
STANDARD OF REVIEW	Under Jackson v. Virginia, the reviewing court asks whether, viewing the evidence in the light most favorable to the prosecution, any rational trier of fact could have found the essential elements of the offense beyond a reasonable doubt. The reviewing court may not substitute its appreciation of the evidence for that of the jury except as necessary to protect due process.
PRECEDENTIAL VALUE	Published, precedential Louisiana Supreme Court opinion
PARTIES	State of Louisiana v. Quint Mire

TOPICS

criminal procedure

appellate procedure

standard of review

evidence

reasonable doubt

PRACTICE AREAS

criminal law

criminal procedure

appellate practice

evidence

QUESTIONS PRESENTED

1. Whether the evidence was constitutionally sufficient under *Jackson v. Virginia* to establish that Mire acted with the specific intent to kill or inflict great bodily harm required for second degree murder.
2. Whether the court of appeal improperly substituted its assessment of the evidence and motive for the jury's rational credibility and evidentiary determinations.
3. Whether the absence of a clear motive rendered the evidence insufficient to prove specific intent.

HOLDINGS

1. The evidence, viewed in the light most favorable to the prosecution, was sufficient for a rational jury to find beyond a reasonable doubt that Mire acted with the specific intent to kill or inflict great bodily harm.
2. Motive is not an essential element of second degree murder, and the State is not required to prove motive beyond a reasonable doubt.
3. The court of appeal impermissibly substituted its appreciation of the evidence for that of the jury and impinged on the jury's fact-finding discretion beyond what due process permits.

KEY QUOTATIONS

“Under the standard of Jackson v. Virginia, “the relevant question is whether, after viewing the evidence in the light most favorable to the prosecution, any rational trier of fact could have found the essential elements of the crime beyond a reasonable doubt.”” (at 703)

“Thus, the court of appeal erred in reversing defendant’s conviction because of the state’s failure to prove a clear and reasonable motive.” (at 707)

“Accordingly, the ruling of the court of appeal is reversed and defendant’s conviction for second degree murder and sentence of life imprisonment at hard labor without parole eligibility are reinstated.” (at 708)

FACTUAL BACKGROUND

Quint Mire shot Julian Gajan three times while the two were hunting deer out of season. The shots struck Gajan in the head, neck, and torso from approximately 40 to 70 feet, and Mire left without rendering aid, concealed the spent shells, and misdirected persons searching for Gajan. Evidence showed a contentious relationship involving financial and business disputes, and one witness testified that Mire had previously discussed killing Gajan.

PROCEDURAL HISTORY

A jury convicted Quint Mire of second degree murder and obstruction of justice and he received concurrent sentences of life imprisonment at hard labor without parole eligibility for murder and ten years at hard labor for obstruction. The Third Circuit vacated the murder conviction, entered a judgment of negligent homicide, and remanded for sentencing. The Louisiana Supreme Court granted the State's application, reversed the court of appeal, and reinstated the second-degree-murder conviction and life sentence.

DISPOSITION

reversed

CASES CITED

- State v. Mart, 352 So. 2d 678, 681 (La. 1977)
- State v. Mussall, 523 So. 2d 1305, 1310 (La. 1988)
- State v. Severin, 04-0326 (La. App. 5 Cir. 9/28/04), 885 So. 2d 609, writ denied, 04-2805 (La. 3/11/05), 896 So. 2d 64
- Jackson v. Virginia, 443 U.S. 307, 319 (1979)
- State v. Lubrano, 563 So. 2d 847, 850 (La. 1990)
- State v. Trahan, 11-0148 (La. App. 3 Cir. 7/6/11), 69 So. 3d 1240
- State v. Trahan, 11-1609, pp. 10-11 (La. 7/2/12), 97 So. 3d 994, 999-1000
- State v. Major, 03-3522, pp. 6-7 (La. 12/1/04), 888 So. 3d 798, 802
- State v. Oliphant, 13-2973 (La. 2/21/14), 133 So. 3d 1255
- State v. Shapiro, 431 So. 2d 372, 385 (La. 1982)
- State v. Jenkins, 134 La. 185, 63 So. 869 (1914)