

DISTRICT OF COLUMBIA COURT OF APPEALS

Crawford v. Dist. of Columbia

Crawford v. District of Columbia, 192 A.3d 568 (D.C. 2018) · No. 15-CT-583 · Decided September 6, 2018

SUMMARY

The District of Columbia Court of Appeals vacated Crawford’s conviction for leaving after colliding with property damage because the trial court applied an erroneous legal standard concerning the offense’s mens rea requirement. The court remanded for the trial court to reconsider the evidence and render a new verdict addressing whether Crawford knew or had reason to believe that his vehicle had been in a collision.

CASE DETAILS

COURT	District of Columbia Court of Appeals
WRITING FOR THE COURT	Chief Judge Blackburne-Rigsby; Associate Judge McLeese; Senior Judge Nebeker
JURISDICTION	District of Columbia
DECIDED	September 6, 2018
DOCKET	15-CT-583
DISPOSITION	vacated
PROCEDURAL POSTURE	Appeal from a Superior Court of the District of Columbia bench-trial conviction for leaving after colliding with property damage.
STANDARD OF REVIEW	For sufficiency of the evidence, the court views the evidence in the light most favorable to the government, giving full play to the fact-finder's determination of credibility, weighing of evidence, and drawing of justifiable inferences. Where the evidence may support a verdict but the trial court's factual findings are insufficient to establish the basis for that verdict, the appellate court remands for additional findings or a new verdict.
PRECEDENTIAL VALUE	Published opinion; precedential
PARTIES	James Crawford v. District of Columbia

TOPICS

- criminal procedure
- appellate procedure
- standard of review
- mens rea
- statutory interpretation

PRACTICE AREAS

criminal procedure

appellate procedure

evidence

statutory interpretation

QUESTIONS PRESENTED

1. Whether the trial court properly applied the mens rea requirement for leaving after colliding with property damage.
2. Whether the conviction could stand when the trial court made no factual finding as to whether Crawford knew or had reason to believe that his vehicle had been in a collision.

HOLDINGS

1. A defendant's lack of awareness of the collision is a proper defense if the defendant did not know or have reason to believe that the vehicle had been in a collision.
2. The conviction must be vacated and the case remanded when the trial court expressed doubt about actual knowledge, failed to determine whether the defendant had reason to believe a collision occurred, and relied on an erroneous legal premise concerning the mens rea requirement.

KEY QUOTATIONS

“This, however, was an erroneous statement of the law—not being aware of the collision constitutes a proper defense if the operator of the vehicle did not know or have reason to believe that he or she had collided with another vehicle.” (192 A.3d at 570)

“Because we have no basis for determining whether the trial court’s verdict properly incorporated the mens rea element, we vacate appellant’s conviction and remand the case for the court to reweigh the evidence and to render a new verdict.” (192 A.3d at 570-71)

FACTUAL BACKGROUND

Crawford was attempting to move a Ford Explorer from a parallel parking space when police officers heard a loud crash and observed the vehicle against a parked Volvo. Crawford drove away but was stopped by the officers. The officers testified that Crawford appeared unaware that he had collided with another vehicle, while the Volvo owner testified that he later observed a new white streak on the bumper. Crawford denied hitting the Volvo.

PROCEDURAL HISTORY

Crawford was convicted in the Superior Court of the District of Columbia of one count of leaving after colliding with property damage and was acquitted of driving under the influence. He appealed, arguing that the evidence was insufficient to establish the required mens rea. The District of Columbia Court of Appeals vacated the conviction and remanded for the trial court to reweigh the evidence and render a new verdict.

DISPOSITION

vacated

REMAND INSTRUCTIONS

The Superior Court must reweigh the evidence in the record and render a new verdict consistent with the opinion, including determining whether Crawford knew or had reason to believe that his vehicle had been in a collision.

CASES CITED

- Medley v. United States, 104 A.3d 115, 127 n.16 (D.C. 2014)
- Warner v. United States, 124 A.3d 79, 89 (D.C. 2015)
- Foster v. United States, 699 A.2d 1113, 1116 n.5 (D.C. 1997)
- Grayson v. United States, 953 A.2d 327, 328 (D.C. 2008)
- Shewarega v. Yegzaw, 947 A.2d 47, 54 (D.C. 2008)
- Cherry v. District of Columbia, 164 A.3d 922, 929 (D.C. 2017)
- Fong Foo v. United States, 369 U.S. 141, 143 (1962)
- Addington v. Texas, 441 U.S. 418, 423-24 (1979)
- Davis v. United States, 834 A.2d 861, 867 (D.C. 2003)
- In re Winship, 397 U.S. 358, 364 (1970)