

SUPREME COURT OF TENNESSEE

State of Tennessee v. William Eugene Hall

No. M2012-00336-SC-DDT-DD · No. M2012-00336-SC-DDT-DD · Decided March 20, 2015

SUMMARY

Chief Justice Sharon G. Lee concurred in the Tennessee Supreme Court's decision affirming William Eugene Hall's death sentence, but disagreed with the majority's reliance on the narrower proportionality review method reaffirmed in *State v. Bland*. She independently applied a broader proportionality review encompassing all similar first-degree murder cases, including cases in which the death penalty was not sought, and concluded that Hall's sentence was neither excessive nor disproportionate.

CASE DETAILS

COURT	Supreme Court of Tennessee
WRITING FOR THE COURT	Sharon G. Lee, Chief Justice
JURISDICTION	Tennessee
DECIDED	March 20, 2015
DOCKET	M2012-00336-SC-DDT-DD
DISPOSITION	other
PROCEDURAL POSTURE	Automatic appeal from the Court of Criminal Appeals in a capital case. The concurrence addresses the proportionality review of Hall's death sentence.
STANDARD OF REVIEW	Proportionality review under Tenn. Code Ann. § 39-13-206(c)(1)(D), considering the nature of the crime and the defendant and comparing the sentence with sentences imposed in similar cases.
PRECEDENTIAL VALUE	Published concurring opinion; non-majority reasoning
PARTIES	State of Tennessee v. William Eugene Hall

TOPICS

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QUESTIONS PRESENTED

1. Whether Hall's death sentence was excessive or disproportionate to sentences imposed in similar cases.
2. Whether Tennessee's statutory proportionality review requires consideration of all similar first-degree murder cases, including cases in which the death penalty was not sought, rather than only cases in which the death penalty was sought.

HOLDINGS

1. After conducting an independent, broader proportionality review, Chief Justice Lee concluded that Hall's death sentence was neither excessive nor disproportionate to the penalties imposed in similar cases.
2. Chief Justice Lee stated that the proportionality review required by Tenn. Code Ann. § 39-13-206(c)(1)(D) should include all similar first-degree murder cases in which either life imprisonment or death was imposed, rather than only cases in which the death penalty was sought.

KEY QUOTATIONS

“Accordingly, as required by Tenn. Code Ann. § 39-13-206(c)(1)(D) and based on the facts in this record, I find that Mr. Hall’s death sentence is “[neither] excessive [n]or disproportionate to the penalty imposed in similar cases, considering both the nature of the crime and the defendant.”” (2)

FACTUAL BACKGROUND

William Eugene Hall received a death sentence for a capital crime. The Tennessee Supreme Court conducted proportionality review of that sentence in Hall's original direct appeal in 1998. In this concurrence, Chief Justice Lee independently reviewed all similar first-degree murder cases, including cases in which the death penalty was not sought, and concluded that Hall's background and crime more closely resembled cases resulting in death sentences.

PROCEDURAL HISTORY

Hall's death sentence was reviewed by the Tennessee Supreme Court on his original direct appeal in 1998. The present matter reached the Tennessee Supreme Court by automatic appeal from the Court of Criminal Appeals, following proceedings in the Humphreys County Criminal Court. Chief Justice Lee concurred in the Court's conclusion that the death sentence was not disproportionate, but disagreed with the majority's reaffirmation of the proportionality-review method used in the original appeal.

DISPOSITION

other

CASES CITED

- State v. Bland, 958 S.W.2d 651, 666 (Tenn. 1997)
- State v. Hall, 976 S.W.2d 121, 135-38 (Tenn. 1998)
- State v. Pruitt, 415 S.W.3d 180, 217, 230-31 (Tenn. 2013)

