

MINNESOTA SUPREME COURT

State of Minnesota v. Scot Perry Christian

No. A24-1026 (Minn. Mar. 25, 2026) · No. A24-1026 · Decided March 25, 2026

SUMMARY

The Minnesota Supreme Court affirmed the denial of Scot Perry Christian’s preliminary application for relief from two first-degree felony murder convictions under a 2023 statutory relief provision. The court held that the trial evidence, together with Christian’s concession on appeal that he told his accomplice to shoot, established that he intentionally aided or advised the killing. Accordingly, the district court did not abuse its discretion in finding no reasonable probability that Christian was entitled to relief.

CASE DETAILS

COURT	Minnesota Supreme Court
WRITING FOR THE COURT	McKeig, Justice
JURISDICTION	Minnesota Supreme Court
DECIDED	March 25, 2026
DOCKET	A24-1026
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from the denial of a preliminary application for relief from first-degree felony murder convictions under the 2023 Minnesota felony-murder relief legislation.
STANDARD OF REVIEW	The denial of a preliminary application under the Act is reviewed for abuse of discretion. A district court abuses its discretion when its decision is based on an erroneous view of the law or is against logic and the facts in the record. Legal conclusions are reviewed de novo.
PRECEDENTIAL VALUE	precedential
PARTIES	Scot Perry Christian v. State of Minnesota

TOPICS

- state post-conviction relief
- post-conviction relief
- criminal procedure
- appellate procedure
- standard of review

PRACTICE AREAS

Minnesota criminal law

post-conviction relief

felony murder

aiding and abetting

appellate procedure

QUESTIONS PRESENTED

1. Whether the district court abused its discretion by denying Christian's preliminary application for relief under the 2023 Act because there was no reasonable probability that he could prove he neither caused nor intentionally aided, advised, counseled, conspired with, or procured another to cause a human death.

HOLDINGS

1. An applicant seeking preliminary relief from a first-degree felony-murder conviction must allege facts that would cause a rational person to believe the applicant might prove by a preponderance of the evidence that he neither caused nor intentionally aided, advised, hired, counseled, conspired with, or procured another with the intent to cause a human death. Christian's allegations were insufficient because the trial record and his appellate concession established that he intentionally aided or advised Powers to cause a death.
2. The district court did not abuse its discretion by denying Christian's preliminary application.

KEY QUOTATIONS

“But the court need not accept an applicant’s mere allegations of entitlement to relief where the applicant “presents no new arguments or evidence in [the] application to support [their] claim” and the “facts established at trial” and confirmed on appeal show that the applicant caused or intended to cause another’s death.” (at 8-9)

“But Christian telling his codefendant to “shoot him” is, on its own, sufficient evidence of Christian’s intent to aid, advise, counsel, conspire with, or procure another with the intent to cause the death of a human being.” (at 9)

FACTUAL BACKGROUND

In 2000, Christian and codefendant Vernon Powers participated in an armed robbery at a motel during which two victims were shot and killed and a third was injured. Eyewitnesses testified that Christian and Powers pointed guns at people in the room and that Christian instructed Powers to shoot; Christian conceded on appeal that he told Powers to shoot. Christian was convicted of first-degree premeditated murder and first-degree felony murder, but the district court entered judgments and imposed consecutive life sentences on the two felony-murder convictions.

PROCEDURAL HISTORY

Christian was convicted of two counts of first-degree felony murder and received consecutive life sentences with the possibility of release. The Minnesota Supreme Court affirmed his convictions in 2003. In 2024, Christian filed a preliminary application seeking permission to petition to vacate the felony-murder convictions under the 2023 Act. The district court denied the application, finding no reasonable probability that he was entitled to relief, and the Minnesota Supreme Court affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Christian, 657 N.W.2d 186 (Minn. 2003)
- In re The Filing of Requests for Relief in Aid and Abet Felony Murder Cases, No. ADM09-8010, Order at 3 (Minn. filed Aug. 18, 2023)
- State v. Zielinski, __ N.W.3d __, __ (Minn. 2026)
- State v. Griffin, 20 N.W.3d 57 (Minn. 2025) (order) (per curiam)
- State v. Griffin, 24 N.W.3d 247 (Minn. 2025)
- State v. Boldman, 813 N.W.2d 102 (Minn. 2012)
- State v. Thomas, 891 N.W.2d 612 (Minn. 2017)

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