

SUPREME COURT OF MINNESOTA

State of Minnesota v. Steven Wayne McBride

666 N.W.2d 351 (Minn. 2003) · No. C5-02-1346 · Decided July 31, 2003

SUMMARY

The Minnesota Supreme Court affirmed Steven Wayne McBride’s convictions and sentence for first-degree felony murder arising from the death of a child in his care. The court held that McBride had a protected privacy interest in the shared apartment and could challenge the search and seizure of a notebook owned by another resident, but concluded that the search warrants were supported by probable cause. The court also addressed McBride’s claim that the evidence was insufficient to support his conviction.

CASE DETAILS

COURT	Supreme Court of Minnesota
WRITING FOR THE COURT	Blatz, Chief Justice
JURISDICTION	Minnesota
DECIDED	July 31, 2003
DOCKET	C5-02-1346
DISPOSITION	affirmed
PROCEDURAL POSTURE	McBride appealed his Dakota County conviction and life-without-parole sentence for first-degree felony murder, challenging admission of a notebook seized under a search warrant and the sufficiency of the evidence.
STANDARD OF REVIEW	Suppression rulings are independently reviewed for legal error. Standing, or whether the defendant had a Fourth Amendment-protected interest, is reviewed de novo when facts are undisputed. Probable-cause determinations supporting search warrants receive great deference and are reviewed for whether the issuing court had a substantial basis. Sufficiency of the evidence is reviewed by asking whether, viewing the evidence in the light most favorable to the state and assuming the jury believed the state's witnesses, a jury could reasonably find the defendant guilty beyond a reasonable doubt.
PRECEDENTIAL VALUE	Published opinion; precedential decision of the Supreme Court of Minnesota

PARTIES

Steven Wayne McBride v. State of Minnesota

TOPICS

search and seizure

probable cause

warrant requirement

suppression of evidence

fourth amendment

PRACTICE AREAS

criminal law

criminal procedure

constitutional law

evidence

appellate procedure

QUESTIONS PRESENTED

1. Whether McBride had a legitimate expectation of privacy in the shared apartment sufficient to challenge the search and seizure of a notebook owned or written by a third party.
2. Whether the search warrants authorizing a search for correspondence between McBride and Patch were supported by probable cause, including whether the second warrant required new information after the first search.
3. Whether admission of the notebook, even if erroneous, was harmless beyond a reasonable doubt.
4. Whether sufficient evidence supported McBride's conviction for first-degree felony murder based on second-degree criminal sexual conduct, including proof that McBride committed the underlying felony and that it occurred as part of the same continuous transaction as the killing.

HOLDINGS

1. A resident with a legitimate expectation of privacy in a shared apartment may challenge the search of that apartment and the use against him of a notebook belonging to or written by a third party.
2. The first search warrant was supported by probable cause to search for correspondence between McBride and Patch because, given their shared caregiving relationship and the child-abuse investigation, there was a fair probability that relevant correspondence would be found in the apartment.
3. Even assuming the second warrant lacked probable cause for a renewed search for correspondence, admission of the notebook was harmless beyond a reasonable doubt because the remaining evidence independently and amply supported the conviction.
4. The evidence was sufficient for the jury to find that McBride committed second-degree criminal sexual conduct against Dillon.
5. The evidence was sufficient to establish that the criminal sexual conduct and the fatal beating were part of one continuous transaction, even though the precise timing of the individual acts and injuries was uncertain.

KEY QUOTATIONS

“We conclude that McBride has a legitimate expectation of privacy in the apartment shared by Patch and McBride and therefore he has the right to challenge the search of the apartment and the use of the notebook against him.” (at 361)

“We, therefore, conclude that there was probable cause for allowing the police to search for correspondence between Patch and McBride in the first search warrant issued on September 18, 2001.” (at 362)

“Therefore, while not reaching the probable cause issue, we conclude that, even if we were to determine that the district court did err when it allowed the admission of the notebook, the error was harmless.” (at 364)

“We therefore hold that there is sufficient evidence for the jury to conclude that the criminal sexual conduct and the beating of Dillon occurred as part of “one continuous transaction.”” (at 366)

FACTUAL BACKGROUND

Dillon Blocker, a young child in McBride's care, sustained numerous bruises, bite marks, fractures, burns, and serious abdominal and head injuries over varying periods. On the night before Dillon's death, McBride was alone with Dillon and his sister while Dillon's mother worked; McBride later reported that Dillon had fallen in the bathroom, but investigators found extensive blood and trauma inconsistent with that explanation. A notebook seized from the apartment contained notes by Dillon's mother describing McBride's repeated physical abuse of Dillon. Expert testimony linked McBride to bite marks on Dillon's genital area and supported the conclusion that the beating and criminal sexual conduct occurred during one continuous transaction.

PROCEDURAL HISTORY

A Dakota County grand jury indicted McBride on four murder counts. After trial in April 2002, the jury convicted him on all counts except intentional second-degree murder, and the district court sentenced him to life in prison without the possibility of parole for first-degree murder while committing second-degree criminal sexual conduct. The Minnesota Supreme Court affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Harris, 590 N.W.2d 90, 98 (Minn. 1999)
- Joel v. Wellman, 551 N.W.2d 729, 730 (Minn. App. 1996), review denied (Minn. Oct. 29, 1996)
- State v. Harris, 589 N.W.2d 782, 787-88 (Minn. 1999)
- Minnesota v. Carter, 525 U.S. 83, 88 (1998)
- Rakas v. Illinois, 439 U.S. 128, 133-40 (1978)
- State v. Carter, 569 N.W.2d 169, 174 (Minn. 1997)
- State v. Perkins, 588 N.W.2d 491, 492 (Minn. 1999)
- Katz v. United States, 389 U.S. 347, 361 (1967)
- United States v. Padilla, 508 U.S. 77, 81 (1993)
- Alderman v. United States, 394 U.S. 165, 176-77 & n.10 (1969)
- State v. Zanter, 535 N.W.2d 624, 628-34 (Minn. 1995)
- State v. Kelly, 435 N.W.2d 807, 813 (Minn. 1989)

- State v. Lynch, 590 N.W.2d 75, 80 (Minn. 1999)
- State v. Juarez, 572 N.W.2d 286, 292 (Minn. 1997)
- State v. Vick, 632 N.W.2d 676, 690 (Minn. 2001)
- State v. Johnson, 568 N.W.2d 426, 435 (Minn. 1997)
- State v. Wallace, 558 N.W.2d 469, 472 (Minn. 1997)
- State v. Russell, 503 N.W.2d 110, 113 (Minn. 1993)
- State v. Harris, 589 N.W.2d 782, 792 (Minn. 1999)
- United States v. Issacs, 708 F.2d 1365, 1368 (9th Cir. 1983)
- United States v. Perez, 700 F.2d 1232, 1236 (8th Cir. 1983)

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