

SUPREME COURT OF IOWA

State of Iowa v. Tremayne Latoine Thomas

847 N.W.2d 438 (Iowa 2014) · No. No. 12-1491 · Decided May 30, 2014

SUMMARY

The Iowa Supreme Court reinstated Tremayne Thomas’s convictions for possession of marijuana and crack cocaine with intent to deliver, holding that substantial circumstantial evidence supported the jury’s finding that he possessed the drugs. The court relied on the location of the drugs, Thomas’s efforts to hold a bedroom door shut, his subsequent misdirection and false statements, and evidence excluding other occupants. The court also rejected Thomas’s Batson challenge, concluding that the State offered a race-neutral reason for striking a potential alternate juror.

CASE DETAILS

COURT	Supreme Court of Iowa
WRITING FOR THE COURT	Mansfield, Justice; Mansfield; Hecht; Wiggins; Appel
JURISDICTION	Iowa
DECIDED	May 30, 2014
DOCKET	No. 12-1491
DISPOSITION	vacated
PROCEDURAL POSTURE	The State sought further review of a Iowa Court of Appeals decision reversing Thomas's convictions for possession of marijuana and crack cocaine with intent to deliver for insufficient evidence. Thomas also challenged the State's peremptory strike of a potential alternate juror under Batson v. Kentucky.
STANDARD OF REVIEW	Sufficiency-of-the-evidence claims are reviewed for correction of errors at law. The court views all record evidence and reasonable inferences in the light most favorable to the State and upholds the verdict if substantial evidence could convince a rational jury of guilt beyond a reasonable doubt. The court gave deference to the district court's Batson findings.
PRECEDENTIAL VALUE	published precedential opinion
PARTIES	Tremayne Latoine Thomas v. State of Iowa

TOPICS

criminal procedure

evidence

jury selection

appellate procedure

standard of review

PRACTICE AREAS

criminal law

criminal procedure

evidence

constitutional law

appellate procedure

QUESTIONS PRESENTED

1. Whether substantial evidence supported Thomas's convictions for possession of marijuana and crack cocaine with intent to deliver when the drugs were found in a jointly occupied bedroom rather than on Thomas's person.
2. Whether the State violated *Batson v. Kentucky* by using a peremptory strike against the only minority member of a panel of potential alternate jurors.

HOLDINGS

1. Substantial evidence supported the jury's finding that Thomas possessed the marijuana and crack cocaine with intent to deliver. Although the bedroom was jointly occupied and the drugs were not found on Thomas's person, the jury could reasonably infer that Thomas had possessed and discarded the drugs shortly before police entered.
2. The State did not commit *Batson* error because it provided a race-neutral explanation for striking the potential alternate juror: the juror emphatically expressed disbelief in police officers' credibility.

KEY QUOTATIONS

"In reviewing challenges to the sufficiency of evidence supporting a guilty verdict, courts consider all of the record evidence viewed in the light most favorable to the State, including all reasonable inferences that may be fairly drawn from the evidence." (at 443)

"Holding back the door would not have made sense if Thomas's goal had been to get away from the police, but it made perfect sense if his goal was to get drugs off his person before the police got to him." (at 444)

"Giving deference to the trial court's finding, we conclude there was no Batson error because the State had a race-neutral reason for striking this potential alternate juror." (at 448)

FACTUAL BACKGROUND

Police entered a Davenport apartment after observing marijuana use and smelling marijuana smoke. Thomas and Isaiah Henderson retreated into a bedroom; Thomas closed the door and attempted to hold it shut while officers forced entry. Near the location where Thomas had been holding the door, officers found individually packaged marijuana and crack cocaine prepared for sale. Thomas resisted, attempted to misdirect an officer, gave a false name, and falsely claimed he had fled because of an outstanding warrant, while Henderson and the apartment's renter denied knowledge of the drugs.

PROCEDURAL HISTORY

Thomas was charged with possession with intent to deliver marijuana, possession with intent to deliver crack cocaine, a drug tax stamp violation, and interference with official acts. The drug tax stamp charge was dismissed. After a jury trial, the district court denied Thomas's motion for directed verdict, convicted him on the remaining charges, and imposed concurrent sentences. The Iowa Court of Appeals reversed the drug-possession convictions for insufficient evidence. The Supreme Court of Iowa granted further review, vacated the court of appeals decision, and affirmed the district court judgment and sentence.

DISPOSITION

vacated

CASES CITED

- Batson v. Kentucky, 476 U.S. 79 (1986)
- State v. Sanford, 814 N.W.2d 611, 615 (Iowa 2012)
- State v. Kern, 831 N.W.2d 149, 160-62 (Iowa 2013)
- State v. DeWitt, 811 N.W.2d 460, 474-77 (Iowa 2012)
- State v. Vance, 790 N.W.2d 775, 784-85 (Iowa 2010)
- State v. Maxwell, 743 N.W.2d 185, 193-95 (Iowa 2008)
- State v. Nitcher, 720 N.W.2d 547, 550-59 (Iowa 2006)
- State v. Carter, 696 N.W.2d 31, 34-41 (Iowa 2005)
- State v. Henderson, 696 N.W.2d 5, 8-10 (Iowa 2005)
- State v. Kemp, 688 N.W.2d 785, 787-90 (Iowa 2004)
- State v. Bash, 670 N.W.2d 135, 136-39 (Iowa 2003)
- State v. Cashen, 666 N.W.2d 566, 568-73 (Iowa 2003)
- State v. Webb, 648 N.W.2d 72, 75-81 (Iowa 2002)
- State v. Griffin, 564 N.W.2d 370, 375-76 (Iowa 1997)
- State v. Clay, 824 N.W.2d 488, 502 (Iowa 2012)
- State v. Welch, 507 N.W.2d 580, 583 (Iowa 1993)
- State v. Schrier, 300 N.W.2d 305, 308 (Iowa 1981)