

SUPREME COURT OF MISSISSIPPI

Stephanie K. Stephens v. State of Mississippi

Stephanie K. Stephens v. State of Mississippi · No. No. 2003-KA-02549-SCT · Decided September 15, 2003

SUMMARY

The Supreme Court of Mississippi affirmed Stephanie K. Stephens’s conviction for murdering her husband and her sentence of life imprisonment. The court addressed alleged violations concerning cameras in the courtroom, the corpus delicti requirement, and the sufficiency of the evidence, concluding that no reversible error occurred.

CASE DETAILS

COURT	Supreme Court of Mississippi
WRITING FOR THE COURT	Graves, Justice; Smith, C.J.; Waller, P.J.; Easley, J.; Carlson, J.; Randolph, J.
JURISDICTION	Mississippi
DECIDED	September 15, 2003
DOCKET	No. 2003-KA-02549-SCT
DISPOSITION	affirmed
PROCEDURAL POSTURE	Direct appeal from a Forrest County Circuit Court murder conviction and life sentence after denial of post-trial motions.
STANDARD OF REVIEW	For denial of a directed verdict and judgment notwithstanding the verdict, the court views the evidence in the light most favorable to the State and gives the State the benefit of all favorable inferences; reversal and rendition are warranted only when the evidence points so overwhelmingly in favor of the defendant that reasonable jurors could not have reached a guilty verdict. Evidentiary rulings are reviewed for abuse of discretion, and evidentiary error warrants reversal only if it adversely affects a substantial right. Unpreserved errors are reviewed, if at all, for plain error.
PRECEDENTIAL VALUE	Published Mississippi Supreme Court opinion; precedential value is not otherwise characterized in the source.
PARTIES	Stephanie K. Stephens v. State of Mississippi

TOPICS

criminal procedure

evidence

preservation of error

appellate procedure

reasonable doubt

PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether allowing CBS to film the trial violated Mississippi Rule of Electronic and Photographic Coverage of Judicial Proceedings Rule 4 or deprived Stephens of a fair trial.
2. Whether informing the jury that the trial was being filmed eliminated the protections of the change-of-venue order.
3. Whether the State established the corpus delicti of murder beyond a reasonable doubt when the evidence included Stephens's alleged confession and corroborating circumstances.
4. Whether the evidence was legally sufficient to support the murder conviction and whether the trial court properly denied directed-verdict and JNOV motions.
5. Whether the trial court abused its discretion by allowing Karen Burnett's testimony concerning Stephens's alleged confession.
6. Whether the trial court erred by refusing a circumstantial-evidence jury instruction.
7. Whether the trial court violated Brady by refusing to disclose the identity of an alleged confidential informant.

HOLDINGS

1. A defendant who makes no contemporaneous objection to the admission or exclusion of media coverage under the Mississippi Rules of Electronic and Photographic Coverage waives the alleged error on appeal, subject only to plain-error review.
2. The placement and operation of the cameras did not violate MREPC Rule 4 or compromise the integrity of the trial; a claimed violation requires evidence both of a rule violation and prejudice or impairment of the right to a fair and impartial trial.
3. Media coverage authorized under the MREPC does not eliminate the protections of a change-of-venue order when the jury is sequestered and the footage is released only after the proceedings conclude.
4. When coupled with other evidentiary proof, Stephens's confession was sufficient to establish the corpus delicti of murder to the required probability and support the conviction.
5. The evidence, viewed in the light most favorable to the State, was legally sufficient to support the murder conviction, so denial of the directed-verdict and JNOV motions was proper.
6. The trial court did not abuse its discretion by allowing Burnett to testify about Stephens's confession; credibility and alleged motives to fabricate were matters for the jury.
7. The trial court properly refused the proposed circumstantial-evidence instruction because Stephens's confession meant the case was not based solely on circumstantial evidence.

8. The trial court properly refused to disclose the informant's identity because Stephens failed to show that the State possessed favorable, material evidence and none of the applicable disclosure conditions was met.

KEY QUOTATIONS

“We hold that a trial court’s decision to allow media coverage of judicial proceedings, pursuant to the MREPC, does not eliminate the protections afforded to a criminal defendant in an order changing venue where the jury was sequestered and the media footage was released after the proceedings had concluded.” (¶30)

“We hold that when coupled with other evidentiary proof offered by the State, Stephanie’s confession to Burnett was sufficient to establish the corpus delicti of murder.” (¶35)

“CONVICTION OF MURDER AND SENTENCE OF LIFE IMPRISONMENT IN THE CUSTODY OF THE MISSISSIPPI DEPARTMENT OF CORRECTIONS, AFFIRMED.” (¶59)

FACTUAL BACKGROUND

David Stephens suffered from severe medical conditions, including end-stage liver disease and diabetes, and died at home on May 1, 2001. An initial investigation attributed the death to natural causes, but toxicological testing and a later autopsy found laudanosine and etomidate, drugs used to induce anesthesia. Evidence at trial included testimony that Stephanie confessed to injecting David with sedatives and a heart medication, evidence of her access to and knowledge of the drugs, and evidence concerning David's deferred-compensation benefits.

PROCEDURAL HISTORY

Stephanie Stephens was indicted for murdering her husband, tried before a jury selected from DeSoto County after a change of venue, convicted, and sentenced to life imprisonment. The circuit court denied her post-trial motions, and she timely appealed, raising numerous claims concerning courtroom cameras, corpus delicti, sufficiency of the evidence, witness testimony, jury instructions, and disclosure of a confidential informant.

DISPOSITION

affirmed

CASES CITED

- Scott v. State, 878 So.2d 933, 953 (Miss. 2004)
- In re S.A.M., 826 So.2d 1266, 1277 (Miss. 2002)
- In re V.R., 725 So.2d 241, 245 (Miss. 1998)
- Williams v. State, 684 So.2d 1179, 1203 (Miss. 1996)
- Walker v. State, 671 So.2d 581, 587 (Miss. 1995)
- Smith v. State, 572 So.2d 847, 848 (Miss. 1990)
- Cole v. State, 525 So.2d 365, 368 (Miss. 1988)

- Burney v. State, 515 So.2d 1154, 1156-57 (Miss. 1987)
- Perkins v. State, 863 So.2d 47, 55 (Miss. 2003)
- Randall v. State, 806 So.2d 185, 195 (Miss. 2001)
- Whigham v. State, 611 So.2d 988, 995 (Miss. 1995)
- Foster v. State, 639 So.2d 1263, 1288-99 (Miss. 1994)
- Gray v. State, 549 So.2d 1316, 1321 (Miss. 1989)
- Grubb v. State, 584 So.2d 786, 789 (Miss. 1991)
- Holland v. State, 705 So.2d 307, 336 (Miss. 1997)
- Hickson v. State, 707 So.2d 536, 542 (Miss. 1997)
- Fisher v. State, 481 So.2d 203, 215 (Miss. 1985)
- Parks v. State, 884 So.2d 738, 742 (Miss. 2004)
- Cotton v. State, 675 So.2d 308, 313-14 (Miss. 1996)
- Poole v. State, 246 Miss. 442, 446, 150 So.2d 429, 431 (1963)
- Hodge v. State, 823 So.2d 1162, 1166 (Miss. 2002)
- Bullock v. State, 447 So.2d 1284, 1286 (Miss. 1984)
- Miskelley v. State, 480 So.2d 1104, 1108 (Miss. 1985)
- Roberts v. State, 153 Miss. 622, 121 So.2d 279 (1929)
- Gandy v. State, 373 So.2d 1042, 1045 (Miss. 1979)
- Groseclose v. State, 440 So.2d 297, 300 (Miss. 1983)
- Shelton v. State, 853 So.2d 117, 1186 (Miss. 2003)
- Seeling v. State, 844 So.2d 439, 443 (Miss. 2003)
- Steele v. State, 544 So.2d 802, 803, 805-06 (Miss. 1989)
- Neal v. State, 805 So.2d 520, 526 (Miss. 2002)
- Tolbert v. State, 407 So.2d 815, 820 (Miss. 1981)
- Mangum v. State, 762 So.2d 337, 344 (Miss. 2000)
- Clark v. State, 891 So.2d 136, 139 (Miss. 2004)
- Herring v. Poirrier, 797 So.2d 797, 804 (Miss. 2000)
- Poirrier, 797 So.2d at 804
- Ladnier v. State, 878 So.2d 926, 933 (Miss. 2004)
- Whitten v. Cox, 799 So.2d 1, 13 (Miss. 2000)
- King v. State, 656 So.2d 1168, 1174 (Miss. 1995)
- Carr v. State, 873 So.2d 991, 999 (Miss. 2004)
- Kyles v. Whitley, 514 U.S. 419, 434 (1995)
- United States v. Bagley, 473 U.S. 667, 678 (1985)