

COURT OF APPEAL OF LOUISIANA, SECOND CIRCUIT

State of Louisiana v. Rapheal Clark

No. 56,697-KA · No. 56,697-KA · Decided December 17, 2025

SUMMARY

The Louisiana Second Circuit Court of Appeal affirmed Rapheal Clark’s four-year hard-labor sentence for theft of merchandise valued between \$1,000 and \$5,000. The court held that the trial court adequately considered the sentencing factors under La. C. Cr. P. art. 894.1 and that the sentence was not constitutionally excessive.

CASE DETAILS

COURT	Court of Appeal of Louisiana, Second Circuit
WRITING FOR THE COURT	Ellender, J.; Stephens, J.; Thompson, J.
JURISDICTION	Court of Appeal of Louisiana, Second Circuit
DECIDED	December 17, 2025
DOCKET	56,697-KA
DISPOSITION	affirmed
PROCEDURAL POSTURE	Clark pleaded guilty to theft of merchandise valued between \$1,000 and \$5,000 and appealed his four-year sentence at hard labor, arguing that it was constitutionally excessive and that the trial court failed to comply with Louisiana Code of Criminal Procedure article 894.1.
STANDARD OF REVIEW	Sentencing excessiveness review has two prongs: whether the record reflects compliance with La. C. Cr. P. art. 894.1 and whether the sentence is constitutionally excessive. Within statutory limits, a sentence is reviewed for manifest abuse of the trial court's broad sentencing discretion.
PRECEDENTIAL VALUE	Published Louisiana Court of Appeal opinion
PARTIES	Rapheal Clark v. State of Louisiana

TOPICS

- sentencing
- cruel and unusual punishment
- criminal procedure
- appellate procedure
- standard of review

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the trial court adequately complied with La. C. Cr. P. art. 894.1 by considering applicable aggravating and mitigating sentencing factors.
2. Whether Clark's four-year sentence for theft of merchandise valued between \$1,000 and \$5,000 was constitutionally excessive under the Louisiana Constitution and the Eighth Amendment.

HOLDINGS

1. The trial court adequately considered the applicable aggravating and mitigating factors even though it did not discuss every factor individually; the record showed that it considered the mitigating evidence presented by Clark and tailored the sentence to the circumstances.
2. The four-year sentence was not constitutionally excessive because it was below the statutory maximum and did not constitute a grossly disproportionate punishment or otherwise shock the sense of justice.

KEY QUOTATIONS

"A sentence violates La. Const. art. 1, § 20, if it is grossly out of proportion to the seriousness of the offense or nothing more than a purposeless and needless imposition of pain and suffering." (at 3)

"The trial court has wide discretion in the imposition of sentences within statutory limits, and the sentence imposed should not be set aside as excessive in the absence of a manifest abuse of discretion." (at 3)

FACTUAL BACKGROUND

Clark and a codefendant stole three backpack leaf blowers, a chainsaw, and a generator from a Lowe's store in Shreveport; the items were collectively valued at \$3,655. Clark was on parole for a felony firearm-possession conviction when he committed the theft and had an extensive criminal history, including multiple felony convictions. The trial court considered mitigating evidence concerning Clark's sickle cell anemia, alleged lack of medical treatment, family and community ties, education, work history, and remorse, but imposed four years at hard labor, consecutive to any other sentence.

PROCEDURAL HISTORY

Clark pleaded guilty in the First Judicial District Court for Caddo Parish. The trial court sentenced him to four years at hard labor, consecutive to any other sentence, and denied his motion to reconsider sentence. The Louisiana Court of Appeal, Second Circuit, affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Caldwell, 56,269 (La. App. 2 Cir. 5/21/25), 411 So. 3d 934

- State v. Benavides, 54,265 (La. App. 2 Cir. 3/9/22), 336 So. 3d 114
- State v. Abercumbia, 412 So. 2d 1027 (La. 1982)
- State v. Williams, 56,184 (La. App. 2 Cir. 2/26/25), 409 So. 3d 306
- State v. Bell, 53,712 (La. App. 2 Cir. 1/13/21), 310 So. 3d 307
- State v. Williams, 03-3514 (La. 12/13/04), 893 So. 2d 7
- State v. Cook, 95-2784 (La. 5/31/96), 674 So. 2d 957
- State v. Cozzetto, 07-2031 (La. 2/15/08), 974 So. 2d 665

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