

CASE BRIEF

Parties:

State of New Jersey – Plaintiff- Appellant v. Sexton – Defendant-Respondent

Facts:

Appellant was convicted of reckless manslaughter. He argued that he did not know the gun was loaded when he pointed it at the Victim and pulled the trigger. The friend of Appellant and Victim heard an argument between them. The friend saw appellant with the gun but did not see him shoot Victim. She heard the gun go off and Victim was killed. Appellant had never before owned or shot a gun. The police did not trace the ownership of the gun. He argued a mistake of fact defense based on reality, that he believed that the gun was Victim's and that he had no idea that it was loaded.

Legal issue:

The legal issue in this case is whether mistake of fact is a defense to the charge of reckless manslaughter.

Procedural history:

The Appellate Court reversed the conviction, because nobody can be convicted of an offence when all elements of such offense are proven beyond reasonable doubt. The court also decided that the jury instruction regarding the charge of first-degree murder is unwarranted. The matter was remanded to the Law Division for further proceedings in accordance with this opinion.

Reasoning of the court:

The Court focused on the question whether if a charge of reckless manslaughter could be subject to a mistake of fact defense and after the discussion confirmed it with reasoning that only faultless or negligent mistakes would negate the culpable mental state of reckless. If the prosecution proves that the mistake is not reasonable, then the jury could find a defendant guilty of reckless manslaughter or negligent manslaughter.