

STATE OF LOUISIANA
COURT OF APPEAL, SECOND CIRCUIT
430 Fannin Street
Shreveport, LA 71101
(318) 227-3700

No. 57,204-KW

STATE OF LOUISIANA

VERSUS

JATORI POTTER

FILED: 07/23/26

RECEIVED: E-FILED 07/23/26

On application of Jatori Potter for SUPERVISORY WRIT in No. 2025-TFC-533881 on the docket of the Bossier City Court, Parish of BOSSIER CITY COURT, Judge Santi A. Parks.

THE HARVILLE LAW FIRM, LLC
Douglas Lee Harville

Counsel for:
Jatori Potter

Richard Russell Ray

Counsel for:
State of Louisiana

Before STONE, COX, and THOMPSON, JJ.

WRIT GRANTED; CONVICTION AND SENTENCE AFFIRMED.

Jatori Potter (“Potter”) seeks review of his conviction for violating La. R.S. 32:125(A), for failing to yield the right-of-way to an authorized emergency vehicle. Potter was convicted on May 26, 2026, and sentenced to pay a \$199.00 fine plus court costs. Potter makes one assignment of error, containing two arguments. Potter argues that no reasonable fact finder could have found that the prosecution proved beyond a reasonable doubt that he knew of the presence or immediate approach of a police vehicle and that so knowing he failed to yield the right-of-way. Potter further argues no reasonable fact finder could have found that the prosecution proved beyond a reasonable doubt that Officer Albrite was driving his police vehicle at the time of the accident “with due regard for the safety of all persons using the highway,” citing La. R.S. 32:125(C).

La. R.S. 32:125(A) is a strict liability state traffic ordinance, and as such, the state is not required to prove any form of scienter or negligence as an element of the offense. *See, State v. Sims*, 15-2163 (La. 6/29/16), 195 So. 3d 441. Likewise, the duty imposed on drivers of authorized emergency vehicles set forth in La. R.S. 32:125(C), does not add an additional element of proof for a violation of La. R.S.

32:125(A). So considering, based upon the standard of review for the sufficiency of evidence provided by *Jackson v. Virginia*, 443 U.S. 307, 319, 99 S. Ct. 2781, 2789, 61 L. Ed. 2d 560 (1979), we conclude that the evidence presented was sufficient to support Potter's conviction for violating La. R.S. 32:125(A). Accordingly, Potter's conviction and sentence are affirmed.

Shreveport, Louisiana, this 6 day of October, 2026.

SDS JSC JRT

FILED: October 6, 2026

Melby Melby

DEPUTY CLERK