

SUPREME COURT OF PENNSYLVANIA

Commonwealth v. Taylor, 583 Pa. 170

876 A.2d 916 (Pa. 2005) · No. No. 367 CAP · Decided June 21, 2005

SUMMARY

The Supreme Court of Pennsylvania reviewed Ronald Taylor’s direct appeal from three death sentences arising from a 2000 shooting rampage in Allegheny County. The court addressed the sufficiency of the evidence and rejected Taylor’s claims that the trial court should have instructed the jury on diminished capacity and third-degree murder. The excerpt also begins discussion of the admissibility and constitutional implications of rebuttal testimony from the Commonwealth’s psychiatric expert during the penalty phase.

CASE DETAILS

COURT	Supreme Court of Pennsylvania
WRITING FOR THE COURT	Justice Castille; Chief Justice Cappy; Justice Nigro; Justice Newman; Justice Saylor; Justice Eakin; Justice Baer
JURISDICTION	Pennsylvania
DECIDED	June 21, 2005
DOCKET	No. 367 CAP
DISPOSITION	affirmed
PROCEDURAL POSTURE	Direct appeal from judgments of sentence imposing three death sentences and an aggregate consecutive sentence of 115 to 230 years after convictions for three counts of first-degree murder and numerous related offenses.
STANDARD OF REVIEW	Sufficiency of the evidence is reviewed by viewing the evidence and reasonable inferences in the light most favorable to the Commonwealth as verdict winner and determining whether each element was proved beyond a reasonable doubt. The admissibility of rebuttal and other evidence is reviewed for abuse of discretion. The Supreme Court independently conducts the statutory review required for a Pennsylvania death sentence.
PRECEDENTIAL VALUE	Published precedential opinion of the Supreme Court of Pennsylvania.
PARTIES	Ronald Taylor v. Commonwealth of Pennsylvania

TOPICS

sentencing criminal procedure evidence due process appellate procedure

PRACTICE AREAS

criminal law capital punishment criminal procedure evidence constitutional law appellate procedure

QUESTIONS PRESENTED

1. Whether the evidence was sufficient to support Taylor's three first-degree murder convictions.
2. Whether the trial court erred by refusing to instruct the jury on diminished capacity and third-degree murder.
3. Whether the trial court abused its discretion by admitting the Commonwealth psychiatrist's rebuttal testimony despite the limited examination of Taylor.
4. Whether admission of the Commonwealth psychiatrist's testimony violated Taylor's Fifth and Sixth Amendment rights because information had been obtained during an earlier competency examination.
5. Whether the trial court abused its discretion by admitting allegedly excessive and cumulative victim-impact testimony.
6. Whether Pennsylvania's statutory authorization of victim-impact evidence violated constitutional protections.
7. Whether the Supreme Court should decide Taylor's unpreserved Atkins claim on direct appeal.
8. Whether the death sentences were the product of passion, prejudice, or an arbitrary factor, and whether the evidence supported the aggravating circumstance.

HOLDINGS

1. The evidence was sufficient to establish that Taylor unlawfully killed Kroll, Healy, and Sanielevici, was responsible for their deaths, and acted with specific intent to kill.
2. The trial court properly refused to instruct the jury on diminished capacity and third-degree murder because the trial evidence did not reasonably support either instruction.
3. The trial court did not abuse its discretion by admitting Dr. Welner's rebuttal testimony concerning Taylor's mental-status mitigating claims.
4. The admission of Dr. Welner's rebuttal testimony did not violate Taylor's Fifth or Sixth Amendment rights.
5. The trial court did not abuse its discretion by admitting the challenged victim-impact testimony, and Pennsylvania's statutory authorization of such evidence is constitutional.
6. The court declined to decide Taylor's Atkins claim on direct appeal and dismissed it without prejudice to his right to raise it in collateral proceedings under the Post Conviction Relief Act.
7. The death sentences satisfied Pennsylvania's statutory review requirements because the evidence supported the aggravating circumstance and the sentences were not the product of passion, prejudice, or

another arbitrary factor.

KEY QUOTATIONS

“Diminished capacity is directed exclusively at the negation of specific intent, and therefore, to be admissible, evidence of the defense must necessarily put into question the criminal defendant's very ability to form the intent to kill.” (876 A.2d at 926)

“As was the case in Mitchell, it would be injudicious at this juncture for this Court to pass upon the claim, and the more appropriate avenue for review of the claim is upon collateral attack if appellant so desires.” (876 A.2d at 937)

“Accordingly, we affirm appellant's convictions and sentences of death and dismiss appellant's claim of death penalty ineligibility based upon mental retardation without prejudice to appellant's right to raise that claim on collateral review under the PCRA.” (876 A.2d at 938)

FACTUAL BACKGROUND

On March 1, 2000, after a confrontation with maintenance workers, Taylor retrieved a revolver, set fire to his apartment, and embarked on a shooting rampage. He shot and killed John Kroll, Joseph Healy, and Emil Sanielevici, severely wounded two other people, threatened and terrorized others, and fired toward police before surrendering after a standoff. Taylor presented insanity and mental-status evidence, but his defense expert acknowledged that Taylor acted deliberately and selectively during the rampage.

PROCEDURAL HISTORY

Taylor was initially adjudicated incompetent and committed for treatment and evaluation. After later competency proceedings, he proceeded to trial, where a jury convicted him of three first-degree murders and related offenses and imposed three death sentences. The trial court formally imposed sentence, Taylor filed an automatic direct appeal, and the Supreme Court of Pennsylvania reviewed the convictions and sentences, including its mandatory statutory review of the death sentences.

DISPOSITION

affirmed

CASES CITED

- Commonwealth v. Zettlemoyer, 500 Pa. 16, 454 A.2d 937 (1982)
- Commonwealth v. Freeman, 573 Pa. 532, 827 A.2d 385 (2003)
- Commonwealth v. Bridges, 563 Pa. 1, 757 A.2d 859 (2000)
- Commonwealth v. Spotz, 563 Pa. 269, 759 A.2d 1280 (2000)
- Commonwealth v. Fletcher, 561 Pa. 266, 750 A.2d 261 (2000)
- Commonwealth v. White, 490 Pa. 179, 415 A.2d 399 (1980)
- Commonwealth v. Crews, 536 Pa. 508, 640 A.2d 395 (1994)

- Commonwealth v. Carter, 502 Pa. 433, 466 A.2d 1328 (1983)
- Commonwealth v. Walzack, 468 Pa. 210, 360 A.2d 914 (1976)
- Commonwealth v. Travaglia, 541 Pa. 108, 661 A.2d 352 (1995)
- Commonwealth v. Weinstein, 499 Pa. 106, 451 A.2d 1344 (1982)
- Commonwealth v. Reid, 571 Pa. 1, 811 A.2d 530 (2002)
- Commonwealth v. Jones, 546 Pa. 161, 683 A.2d 1181 (1996)
- Commonwealth v. McCrae, 574 Pa. 594, 832 A.2d 1026 (2003)
- Estelle v. Smith, 451 U.S. 454 (1981)
- Buchanan v. Kentucky, 483 U.S. 402 (1987)
- Commonwealth v. Morley, 545 Pa. 420, 681 A.2d 1254 (1996)
- Commonwealth v. Means, 565 Pa. 309, 773 A.2d 143 (2001)
- Payne v. Tennessee, 501 U.S. 808 (1991)
- Commonwealth v. Williams, 578 Pa. 504, 854 A.2d 440 (2004)
- Commonwealth v. Harris, 572 Pa. 489, 817 A.2d 1033 (2002)
- Commonwealth v. Rice, 568 Pa. 182, 795 A.2d 340 (2002)
- Atkins v. Virginia, 536 U.S. 304 (2002)
- Penry v. Lynaugh, 492 U.S. 302 (1989)
- Commonwealth v. Mitchell, 576 Pa. 258, 839 A.2d 202 (2003)

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