

SUPREME COURT OF RHODE ISLAND

State v. Prout

996 A.2d 641 (R.I. 2010) · No. No. 2006-203-C.A. · Decided June 16, 2010

SUMMARY

The Rhode Island Supreme Court reviewed Justin Prout's convictions for unlawful breaking and entering, assault with a dangerous weapon, and simple assault. Prout argued that the trial justice improperly denied his motion for a new trial by overlooking credibility issues and evidence of diminished capacity. The court held that the trial justice properly evaluated the evidence and that diminished capacity was irrelevant to the general-intent assault offenses, affirming the Superior Court judgment.

CASE DETAILS

COURT	Supreme Court of Rhode Island
WRITING FOR THE COURT	Chief Justice Suttell; Suttell, C.J.; Goldberg, J.; Flaherty, J.; Robinson, J.
JURISDICTION	Rhode Island
DECIDED	June 16, 2010
DOCKET	No. 2006-203-C.A.
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed from judgments of conviction entered after a jury trial and from the denial of his motion for a new trial.
STANDARD OF REVIEW	The Supreme Court gives great weight and deferential review to a trial justice's ruling on a motion for a new trial when the trial justice articulates sufficient reasoning. The ruling will not be overturned unless the trial justice overlooked or misconceived material evidence or was otherwise clearly wrong.
PRECEDENTIAL VALUE	Published Rhode Island Supreme Court opinion; precedential.
PARTIES	Justin Prout v. State of Rhode Island

TOPICS

- criminal procedure
- standard of review
- appellate procedure
- evidence
- mens rea

PRACTICE AREAS

Criminal law

Criminal procedure

Appellate practice

QUESTIONS PRESENTED

1. Whether the trial justice overlooked or misconceived material evidence concerning the credibility of the State's witnesses when denying Prout's motion for a new trial.
2. Whether the trial justice overlooked or misconceived evidence of Prout's alleged diminished capacity.
3. Whether the trial justice correctly applied the new-trial standard in determining that the evidence supported the convictions.

HOLDINGS

1. The trial justice properly acted as a thirteenth juror, independently evaluated the witnesses' credibility and the weight of the evidence, and articulated sufficient reasons for denying the motion; the credibility findings and conclusion that the evidence supported the convictions were entitled to great weight.
2. Diminished capacity is available only for specific-intent crimes; it was irrelevant to Prout's convictions for simple assault and assault with a dangerous weapon because those offenses are general-intent crimes. The trial justice also properly considered diminished capacity in relation to the burglary charge and its lesser-included breaking-and-entering offense.

KEY QUOTATIONS

"When deciding a motion for a new trial, 'the trial justice acts as a thirteenth juror and exercises independent judgment on the credibility of witnesses and on the weight of the evidence.'" (645)

"The trial justice's decision is entitled to great weight 'if he or she has articulated sufficient reasoning in support of the ruling.'" (646)

"In Rhode Island, the defense of diminished capacity is available only for specific-intent crimes." (647)

FACTUAL BACKGROUND

On April 1, 2004, Justin Prout entered a Providence residence without permission and became involved in a violent altercation with occupants of the home. The occupants testified that Prout forced his way inside, wielded a knife, and attacked them; physical evidence included a hole in the wall, disarray, broken glass, and blood. Prout was intoxicated when treated at a hospital, with a blood-alcohol level of 0.175, and argued that witness credibility and diminished capacity warranted a new trial.

PROCEDURAL HISTORY

A jury acquitted Prout of burglary but convicted him of unlawful breaking and entering of a dwelling house, assault with a dangerous weapon, and simple assault. The Superior Court trial justice denied Prout's motion for a new trial, concluding that the State's witnesses were credible, the evidence was sufficient, and the jury had appropriately considered diminished capacity. Prout appealed, and the Rhode Island Supreme Court summarily decided the appeal after directing the parties to show cause why further briefing or argument was unnecessary.

DISPOSITION

affirmed

REMAND INSTRUCTIONS

The papers in the case may be remanded to the Rhode Island Superior Court.

CASES CITED

- State v. Bergevine, 942 A.2d 974, 981 (R.I. 2008)
- State v. Gomez, 848 A.2d 221, 234 (R.I. 2004)
- State v. Cerda, 957 A.2d 382, 385 (R.I. 2008)
- State v. Schloesser, 940 A.2d 637, 639 (R.I. 2007)
- State v. Flori, 963 A.2d 932, 937 (R.I. 2009)
- State v. Cardona, 969 A.2d 667, 672-73 (R.I. 2009)
- State v. Espinal, 943 A.2d 1052, 1058 (R.I. 2008)
- State v. Correra, 430 A.2d 1251, 1253 (R.I. 1981)
- State v. Doyon, 416 A.2d 130 (R.I. 1980)
- State v. Sivo, 925 A.2d 901, 914 (R.I. 2007)
- State v. Diefenderfer, 970 A.2d 12, 23 n. 24 (R.I. 2009)