

SUPREME COURT OF RHODE ISLAND

State v. Fillion

785 A.2d 536 (R.I. 2001) · No. No. 00-456-C.A. · Decided November 28, 2001

SUMMARY

The Rhode Island Supreme Court affirmed Joseph Fillion’s convictions for domestic assault, disorderly conduct, simple assault, and violating a domestic no-contact order. The court held that any restriction on cross-examination concerning the complaining witness’s potential financial motives was harmless beyond a reasonable doubt, upheld the exclusion of evidence concerning her prior relationship, and found no prejudicial abuse of discretion in consolidating the charges for trial.

CASE DETAILS

COURT	Supreme Court of Rhode Island
WRITING FOR THE COURT	Williams, C.J.; Lederberg, J.; Bourcier, J.; Flanders, J.; Goldberg, J.
JURISDICTION	Rhode Island
DECIDED	November 28, 2001
DOCKET	No. 00-456-C.A.
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed Superior Court judgments of conviction. The Supreme Court of Rhode Island summarily decided the appeal after a single justice directed the parties to show cause why the appeal should not be summarily decided.
STANDARD OF REVIEW	Cross-examination restrictions are reviewed under the applicable harmless-beyond-a-reasonable-doubt standard when a constitutional confrontation claim is asserted. Evidentiary relevance determinations and joinder or severance decisions are reviewed for abuse of discretion; severance requires a showing of clear abuse of discretion and legally sufficient prejudice.
PRECEDENTIAL VALUE	Published precedential opinion
PARTIES	Joseph Fillion v. State of Rhode Island

TOPICS

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the trial justice improperly restricted cross-examination of the complaining witness concerning possible financial motives and thereby violated Fillion's confrontation rights.
2. Whether the trial justice improperly excluded evidence concerning the complaining witness's prior relationship with another police officer and alleged violence during that relationship.
3. Whether the trial justice abused his discretion by consolidating charges from an indictment and two informations for a single trial and by denying severance.

HOLDINGS

1. Any assumed error in restricting cross-examination about the complaining witness's possible plans to write a book, appear on a television program, or seek alimony was harmless beyond a reasonable doubt because the defense otherwise conducted extensive cross-examination and the prosecution's evidence was sufficient and largely corroborated.
2. The trial justice did not abuse his discretion by excluding evidence concerning the complaining witness's prior relationship with Edward Evans because Fillion lacked firsthand knowledge of the alleged incident, the incident was remote, and the evidence was not relevant to the issues at trial.
3. The trial justice did not abuse his discretion by joining the charges from the indictment and two informations for trial, and Fillion failed to demonstrate the prejudice required for severance.

KEY QUOTATIONS

"We know of no doctrine in the law that is designed to insulate defendant from relevant truths, even if such truths might lead the jury to draw less favorable inferences concerning defendant than if they were not exposed." (785 A.2d at 542)

FACTUAL BACKGROUND

The complaining witness, Tori-Lynn Heaton-Fillion, dated Fillion beginning in 1997, moved in with him, and married him in 1998. She testified about numerous alleged abusive and disorderly incidents occurring before and after the marriage. Fillion sought to cross-examine her about possible financial motives, including a proposed book, a television appearance, and an alimony request, and sought to introduce evidence concerning her prior relationship with another police officer. The charges arose from related events in the parties' relationship and included an alleged violation of a no-contact order.

PROCEDURAL HISTORY

Fillion was charged by indictment and by two informations with domestic assault, disorderly conduct, stalking, and violation of a domestic no-contact order. The stalking charge was dismissed, and the remaining charges were consolidated for trial over Fillion's objection. He was convicted of three counts of domestic simple assault,

domestic disorderly conduct, simple assault, and violating a domestic no-contact order; the Supreme Court denied and dismissed the appeal and affirmed the judgments.

DISPOSITION

affirmed

REMAND INSTRUCTIONS

The papers of the case were remanded to the Superior Court; no additional substantive instructions were given.

CASES CITED

- State v. Bustamante, 756 A.2d 758, 765-766 (R.I. 2000)
- State v. Wiley, 676 A.2d 321, 324 (R.I. 1996)
- State v. Olsen, 610 A.2d 1099, 1101 (R.I. 1992)
- State v. Beaumier, 480 A.2d 1367, 1372 (R.I. 1984)
- State v. Texter, 594 A.2d 376, 377-378 (R.I. 1991)
- State v. Veluzat, 578 A.2d 93, 95 (R.I. 1990)
- State v. Canning, 541 A.2d 457, 461 (R.I. 1988)
- Delaware v. Van Arsdall, 475 U.S. 673, 682 (1986)
- Rose v. Clark, 478 U.S. 570, 576 (1986)
- State v. Tribble, 428 A.2d 1079, 1085-1086 (R.I. 1981)
- Commonwealth v. Amos, 445 Pa. 297, 284 A.2d 748, 752 (1971)
- State v. Cote, 691 A.2d 537, 543 (R.I. 1997)
- State v. Evans, 742 A.2d 715, 718 (R.I. 1999)
- State v. Raymond, 446 A.2d 743, 744 (R.I. 1982)
- State v. Cline, 122 R.I. 297, 327-331, 405 A.2d 1192, 1208-1210 (1979)
- State v. Lassar, 555 A.2d 339, 347 (R.I. 1989)
- State v. Sharbuno, 120 R.I. 714, 717, 719, 390 A.2d 915, 917-918 (1978)

INSTRUCTIONS FOR AN AI ASSISTANT

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