

SUPREME JUDICIAL COURT OF MAINE

State v. Junkins, 2002 ME 20

789 A.2d 1266 (Me. 2002) · Decided February 7, 2002

SUMMARY

The Maine Supreme Judicial Court affirmed Raymond Junkins's convictions for murder, attempted murder, robbery, theft, and witness tampering. The court held that the evidence was sufficient, the trial court properly excluded unreliable statements and allowed limited motive evidence concerning a pending New Hampshire charge, and the jury pool was not shown to have been tainted.

CASE DETAILS

COURT	Supreme Judicial Court of Maine
WRITING FOR THE COURT	Calkins, J.; Saufley, C.J.; Clifford, J.; Rudman, J.; Dana, J.; Alexander, J.
JURISDICTION	Maine
DECIDED	February 7, 2002
DISPOSITION	affirmed
PROCEDURAL POSTURE	Raymond Junkins appealed from a judgment of conviction entered after a jury found him guilty of intentional or knowing murder, attempted murder, robbery, theft by unauthorized taking or transfer, and tampering with a witness.
STANDARD OF REVIEW	For sufficiency of the evidence, the court viewed the evidence in the light most favorable to the verdict and asked whether a rational factfinder could find every element beyond a reasonable doubt. Evidentiary rulings, including admissibility under the statement-against-interest and relevance/prejudice rules, were reviewed for abuse of discretion, with factual reliability findings reviewed for clear error. The alleged jury-pool prejudice issue was reviewed for actual prejudice.
PRECEDENTIAL VALUE	Published precedential opinion of the Supreme Judicial Court of Maine
PARTIES	Raymond Junkins v. State of Maine

TOPICS

criminal procedure

evidence

jury selection

appellate procedure

standard of review

PRACTICE AREAS

criminal law

criminal procedure

evidence

appellate procedure

QUESTIONS PRESENTED

1. Whether the evidence was sufficient to support Junkins's convictions.
2. Whether the trial court abused its discretion by excluding videotaped statements made by Verna Junkins to police as statements against interest.
3. Whether the trial court abused its discretion by refusing to admit the videotapes to impeach the testimony of Anthony Dorothy.
4. Whether evidence that Junkins had a pending nonviolent New Hampshire charge and was released on bail was improperly admitted to prove motive.
5. Whether remarks by a prospective juror that Junkins was "guilty as sin" tainted the jury pool and required dismissal of the entire venire.

HOLDINGS

1. The evidence was sufficient to support all five convictions because, viewed favorably to the verdict, a rational factfinder could find the elements of the offenses beyond a reasonable doubt.
2. The trial court did not abuse its discretion in excluding the videotaped police interviews under Maine Rule of Evidence 804(b)(3) because the statements were unreliable and lacked trustworthy attendant circumstances.
3. The trial court acted within its discretion in excluding six hours of videotaped interviews offered to impeach Dorothy because the proposed impeachment was dubious and admission would have wasted the jury's time.
4. The trial court properly admitted evidence that Junkins had a pending nonviolent New Hampshire charge and was out on bail because the evidence was relevant to motive and its probative value outweighed the danger of unfair prejudice.
5. Junkins was not entitled to dismissal of the entire venire because the prospective jurors who overheard the prejudicial remark were identified and excused, and Junkins failed to demonstrate actual prejudice.

KEY QUOTATIONS

"When the defendant claims that the evidence was insufficient to support a conviction, we review the evidence in the light most favorable to the jury's verdict to determine if the factfinder, acting rationally, could find every element of the offenses beyond a reasonable doubt." (¶ 12, 789 A.2d at 1269)

"Because there can be no presumption of prejudice in this case, Junkins must demonstrate that he suffered actual prejudice from Juror # 60's statement." (¶ 21, 789 A.2d at 1271)

FACTUAL BACKGROUND

Howard LaFoe was stabbed to death in the apartment where he lived with Verna Junkins, the defendant's elderly grandmother, who was also found injured and appeared to have been choked or smothered. Verna's purse and LaFoe's wallet were missing, and Junkins paid a substantial debt that night with twenty-dollar bills despite owing the money earlier that day. Afterward, Junkins attempted to create a false alibi, disposed of clothing and bags, told his girlfriend that he had stolen money, and allegedly confessed to the killing while jailed. The jury convicted him of murder, attempted murder, robbery, theft, and witness tampering.

PROCEDURAL HISTORY

A York County Superior Court jury convicted Junkins on all five charges. The trial court sentenced him to forty years' imprisonment for murder and lesser concurrent terms for the remaining offenses. On appeal, Junkins challenged the sufficiency of the evidence, several evidentiary rulings, and the alleged tainting of the jury pool. The Supreme Judicial Court of Maine affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Junkins, 2001 ME 133, 779 A.2d 948
- State v. Parsons, 2001 ME 85, ¶ 6, 773 A.2d 1034, 1036
- State v. Dill, 2001 ME 150, ¶ 13, 783 A.2d 646, 651
- State v. Saucier, 2001 ME 107, ¶¶ 15, 20, 776 A.2d 621, 626-27
- State v. Corson, 572 A.2d 483, 485 (Me. 1990)