

SUPREME JUDICIAL COURT OF MAINE

State of Maine v. Allen James Jr.

2026 ME 28 · No. Wal-25-77 · Decided March 19, 2026

SUMMARY

The Maine Supreme Judicial Court affirmed Allen James Jr.'s convictions for aggravated drug trafficking and violating a condition of release, as well as his thirty-year sentence. The court held that the jury instructions on accomplice liability, viewed as a whole, did not constitute plain error. It also held that the sentencing court lawfully and properly considered the nature and seriousness of James's ongoing drug-trafficking offense in setting the basic sentence.

CASE DETAILS

COURT	Supreme Judicial Court of Maine
WRITING FOR THE COURT	Stanfill, C.J.; Mead, J.; Connors, J.; Lawrence, J.; Douglas, J.; Lipez, J.
JURISDICTION	Maine Supreme Judicial Court
DECIDED	March 19, 2026
DOCKET	Wal-25-77
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed from judgments of conviction following a jury trial on aggravated drug-trafficking charges and a guilty plea to violating a condition of release, and separately appealed his sentence after obtaining leave from the Sentence Review Panel. The sentence appeal merged into the conviction appeal.
STANDARD OF REVIEW	Unpreserved jury-instruction claims are reviewed for obvious error. Jury instructions are evaluated as a whole for their total effect, potential for juror misunderstanding, and whether they fairly and correctly state the governing law. On an authorized sentence appeal, the legality of the basic sentence is reviewed de novo for misapplication of legal principles, while propriety is reviewed for disregard of relevant sentencing factors or abuse of sentencing power.
PRECEDENTIAL VALUE	Published and precedential opinion of the Supreme Judicial Court of Maine.
PARTIES	Allen James Jr. v. State of Maine

TOPICS

jury instructions

criminal procedure

sentencing

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standard of review

PRACTICE AREAS

criminal law

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QUESTIONS PRESENTED

1. Whether the trial court's accomplice-liability jury instructions, including references to 'a' crime rather than 'the' crime and an oral misstatement, constituted plain error.
2. Whether the trial court unlawfully considered the number and nature of transactions comprising an ongoing trafficking offense when determining the basic sentence at step one.
3. Whether the basic sentence was improper because the sentencing court considered conduct occurring throughout the charged period even though the jury was not instructed on a scheme or course of conduct.

HOLDINGS

1. The jury instructions, considered as a whole, correctly and fairly informed the jury that accomplice liability required intentional assistance in the specific drug-trafficking offense committed by the principal. The isolated references to 'a' crime and the oral misstatement did not create a legally significant ambiguity or a patchwork verdict, and therefore did not constitute plain error.
2. The trial court lawfully considered the number and nature of transactions occurring during the charged period when determining the basic sentence for the ongoing trafficking offense because that evidence was not extrinsic to the particular nature and seriousness of the offense of conviction.
3. The basic sentence was not improper. The jury's verdict found James guilty of trafficking on or between April 4 and August 27, 2023, and the sentencing court could consider reliable evidence concerning the nature and seriousness of that ongoing offense, including conduct during that period.

KEY QUOTATIONS

“Thus, to find a person guilty of a crime as an accomplice, a jury must find that the person intended to promote, and engaged in conduct to promote, “the” specific offense committed by the principal.” (¶ 15)

“Although James is correct that it would have been more precise to define the elements of accomplice liability with reference to “the” crime rather than “a” crime and that the court misspoke when orally instructing the jury, neither of those isolated imperfections caused the jury to be misinformed about the law of accomplice liability.” (¶ 19)

“Because the court’s determination of James’s basic sentence did not rely on any evidence that was “extrinsic to” the ongoing offense for which James was convicted, the court did not misapply the legal principle we articulated in Downs.” (¶ 24)

FACTUAL BACKGROUND

James operated a substantial drug-trafficking operation from a shared residence during the spring and summer of 2023 and regularly directed housemates to conduct transactions. A confidential informant obtained drugs from people other than James on several controlled-purchase dates after communicating with James about acquiring drugs. The jury convicted James of trafficking on April 25 and of trafficking occurring on or between April 4 and August 27, 2023, while acquitting him of the July 5 trafficking charge and failing to reach verdicts on the April 4 trafficking and conspiracy charges. At sentencing, the court found by a preponderance of the evidence that James conducted an ongoing trafficking business during the charged period and imposed a thirty-year sentence.

PROCEDURAL HISTORY

The State initially filed a criminal complaint charging one count of aggravated drug trafficking and later obtained a superseding indictment charging multiple trafficking counts, a release-condition violation, and conspiracy. Following trial, the jury convicted James on two trafficking counts, acquitted him on one, and failed to reach verdicts on two others; the court declared a mistrial on the unresolved counts. The trial court merged the two trafficking convictions for sentencing and imposed a thirty-year sentence, and the Supreme Judicial Court affirmed while directing correction of clerical records to reflect the merger.

DISPOSITION

affirmed

REMAND INSTRUCTIONS

The trial court should correct the judgment and docket records to reflect that Counts 2 and 5 were merged and that the thirty-year sentence and \$400 fine were imposed on the merged offense, not separately on each count.

CASES CITED

- State v. Kilgore, 2025 ME 81, ¶¶ 3, 21, 345 A.3d 48
- State v. Osborn, 2023 ME 19, ¶¶ 13, 26-29, 33-35, 290 A.3d 558
- State v. Chapman, 2014 ME 69, ¶ 11, 92 A.3d 358
- State v. Perry, 2006 ME 76, ¶¶ 22-24, 899 A.2d 806
- State v. Plummer, 2020 ME 106, ¶¶ 14-23, 26, 238 A.3d 241
- State v. Rosario, 2022 ME 46, ¶ 29, 280 A.3d 199
- State v. Lajoie, 2017 ME 8, ¶ 15, 154 A.3d 132
- Clewley v. Whitney, 2002 ME 61, ¶ 9, 794 A.2d 87
- Clark v. Heald, 2009 ME 111, ¶ 2, 983 A.2d 406
- In re Commitment of M., 2020 ME 99, ¶¶ 5, 17-18, 237 A.3d 190
- Rush v. County of Aroostook, 447 A.2d 478, 479 n.2 (Me. 1982)
- United States v. U.S. Sugar Corp., 73 F.4th 197, 203 n.2 (3d Cir. 2023)
- State v. Robshaw, 2025 ME 50, ¶ 13, 339 A.3d 784
- State v. Carrillo, 2021 ME 18, ¶ 42, 248 A.3d 193

- State v. Chase, 2025 ME 90, ¶¶ 23-24, 345 A.3d 183
- State v. Plummer, 2020 ME 143, ¶ 10, 243 A.3d 1184
- State v. Downs, 2007 ME 41, ¶¶ 2-3, 12-13, 916 A.2d 210
- State v. Perkins, 2019 ME 6, ¶ 11, 199 A.3d 1174
- State v. Gauthier, 2007 ME 156, ¶ 24, 939 A.2d 77
- Manley v. State, 2015 ME 117, ¶ 18, 123 A.3d 219
- State v. Carter, 109 P.3d 823, 825-26, 829 (Wash. 2005)

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