SUPREME COURT OF PENNSYLVANIA

Commonwealth v. Torres

564 Pa. 219 (2001) (Pa. 2001) · Decided February 21, 2001

SUMMARY

The Supreme Court of Pennsylvania held that the evidence was insufficient to sustain Raul Torres's simple-assault conviction because the Commonwealth failed to disprove his claim of self-defense beyond a reasonable doubt. The court concluded that the victim's hearsay statements and medical evidence established only that an altercation occurred and did not contradict Torres's account that he acted defensively. The court reversed the Superior Court's order and discharged Torres.

CASE DETAILS

COURT	Supreme Court of Pennsylvania
WRITING FOR THE COURT	Saylor, Justice; Flaherty, C.J.; Zappala, J.; Cappy, J.; Castille, J.; Nigro, J.; Newman, J.; Saylor, J.
JURISDICTION	Pennsylvania
DECIDED	February 21, 2001
DISPOSITION	reversed
PROCEDURAL POSTURE	Torres appealed from his conviction for simple assault after the Superior Court affirmed the trial court's admission of the victim's hearsay statements and concluded that the evidence was sufficient. The Supreme Court considered only whether the evidence was sufficient to disprove Torres's claim of self-defense.
STANDARD OF REVIEW	For a sufficiency challenge, the court views all evidence in the light most favorable to the verdict winner and gives that party the benefit of all reasonable inferences. The court reviewed de novo whether the evidence was legally sufficient to disprove self-defense beyond a reasonable doubt.
PRECEDENTIAL VALUE	Published precedential opinion of the Supreme Court of Pennsylvania
PARTIES	Raul Torres v. Commonwealth of Pennsylvania

TOPICS

self defense · criminal procedure · evidence · appellate procedure

PRACTICE AREAS

Criminal law | Criminal procedure | Evidence | Appellate practice

QUESTIONS PRESENTED

1. Whether the evidence was sufficient to sustain Torres's simple-assault conviction when the Commonwealth failed to disprove his claim of self-defense beyond a reasonable doubt.

HOLDINGS

1. The evidence was legally insufficient because the Commonwealth failed to disprove Torres's claim of self-defense beyond a reasonable doubt.

KEY QUOTATIONS

> *"Finally, we note that the Commonwealth cannot sustain its burden of proof solely on the fact finder's disbelief of the defendant's testimony."* (345)

> *"The trial court's statement that it did not believe Appellant's testimony is no substitute for the proof the Commonwealth was required to provide to disprove the self-defense claim."* (345)

> *"As the Commonwealth has failed to demonstrate beyond a reasonable doubt that Appellant did not act in self-defense, the evidence is insufficient as a matter of law to support the conviction."* (345)

FACTUAL BACKGROUND

A police officer responded to a report that James Pleasant had been struck on the head with a wrench and found Pleasant agitated, injured, and identifying Torres as the assailant. Pleasant did not appear at Torres's non-jury trial, but the trial court admitted Pleasant's statements to the officer as excited utterances. Torres testified that Pleasant had first punched him and threw another punch after Torres pushed him away, prompting Torres to strike Pleasant once and cause him to fall and injure his head. The parties stipulated to Pleasant's head wound, his parole status following an aggravated-assault sentence, and Torres's reputation for peacefulness and honesty.

PROCEDURAL HISTORY

After a non-jury trial, the trial court convicted Torres of simple assault and imposed two years of probation and 200 hours of community service. The Superior Court affirmed in a memorandum opinion, upholding admission of the alleged victim's statements under the excited-utterance exception and finding sufficient evidence to sustain the conviction. The Supreme Court reversed and discharged Torres because the Commonwealth failed to disprove self-defense beyond a reasonable doubt.

DISPOSITION

reversed

REMAND INSTRUCTIONS

No remand was ordered; the Supreme Court reversed the Superior Court's order and discharged Torres.

CASES CITED

- Commonwealth v. Widmer, 560 Pa. 308, 318, 744 A.2d 745, 751 (2000)
- In re Maloney, 431 Pa. Super. 321, 326-27, 636 A.2d 671, 673-74 (1994)
- Commonwealth v. Samuel, 527 Pa. 298, 303, 590 A.2d 1245, 1247 (1991)
- Commonwealth v. Upsher, 497 Pa. 621, 624, 444 A.2d 90, 91 (1982)
- Commonwealth v. Black, 474 Pa. 47, 53, 376 A.2d 627, 630 (1977)
- Commonwealth v. Mayfield, 401 Pa. Super. 560, 564, 585 A.2d 1069, 1071 (1991)
- Commonwealth v. Schaller, 493 Pa. 426, 438, 426 A.2d 1090, 1096 (1981)
- Commonwealth v. Graham, 528 Pa. 250, 252, 596 A.2d 1117, 1118 (1991)

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