

SUPREME JUDICIAL COURT OF MAINE

State of Maine v. Christopher Todd Hall

Hall, 2019 ME 126 (Supreme Judicial Court of Maine 2019) · No. Yor-18-277 · Decided August 6, 2019

SUMMARY

The Maine Supreme Judicial Court affirmed Christopher Todd Hall’s convictions for aggravated assault, assault, and attempted kidnapping. The court held that the evidence was sufficient to establish the stun cane was a dangerous weapon and that Hall took substantial steps toward kidnapping the victim for ransom or reward. The court also upheld the jury instructions and remanded for dismissal of a fourth count after a mistrial.

CASE DETAILS

COURT	Supreme Judicial Court of Maine
WRITING FOR THE COURT	Saufley, C.J.; Alexander, J.; Mead, J.; Gorman, J.; Jabar, J.; Hjelm, J.; Humphrey, J.
JURISDICTION	Maine
DECIDED	August 6, 2019
DOCKET	Yor-18-277
DISPOSITION	affirmed
PROCEDURAL POSTURE	Hall appealed from a judgment of conviction entered after a jury trial on aggravated assault, assault, and attempted kidnapping with intent to hold the victim for ransom or reward. He challenged the sufficiency of the evidence and the adequacy of the jury instructions.
STANDARD OF REVIEW	For sufficiency of the evidence, the court viewed the evidence in the light most favorable to the State and determined whether the fact-finder could rationally find every element beyond a reasonable doubt, deferring to credibility determinations and reasonable inferences. For jury-instruction issues, the court considered whether the requested instruction correctly stated the law, was generated by the evidence, was not misleading or confusing, and was not sufficiently covered by the instructions given; the defendant also had to show prejudice.
PRECEDENTIAL VALUE	published and precedential
PARTIES	Christopher Todd Hall v. State of Maine

TOPICS

statutory interpretation

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the evidence was sufficient to support Hall's aggravated-assault conviction based on use of a dangerous weapon.
2. Whether the evidence was sufficient to support Hall's assault conviction.
3. Whether the evidence was sufficient to support Hall's attempted-kidnapping conviction based on intent to hold the victim for ransom or reward.
4. Whether the trial court adequately instructed the jury regarding the statutory meaning of physical health and serious bodily injury.
5. Whether an electronic weapon may also constitute a dangerous weapon under Maine's aggravated-assault statute.

HOLDINGS

1. The evidence was sufficient for the jury to find that the stun cane, as used, was a dangerous weapon capable of producing death or serious bodily injury and that Hall caused bodily injury with it.
2. The statutory phrase 'physical health' refers to bodily or physiological health and does not include mental or emotional health.
3. The evidence was sufficient to prove that Hall intentionally caused the victim physical pain and impairment of physical condition.
4. The evidence was sufficient to establish a substantial step toward restraining the victim and holding her for ransom or reward.
5. The trial court did not err by giving the statutory language and allowing the jury to determine the common-sense meaning of physical health without a separate instruction expressly excluding mental or emotional health.
6. An item may qualify both as an electronic weapon under 17-A M.R.S. § 1004 and as a dangerous weapon under 17-A M.R.S. § 2(9)(A), depending on the manner in which it is used.

KEY QUOTATIONS

“When reviewing a judgment for sufficiency of the evidence, we view the evidence in the light most favorable to the State to determine whether the fact-finder could rationally have found each element of the offense beyond a reasonable doubt.” (¶ 16)

“The stun cane could be both “a portable device or weapon from which an electrical current, impulse, wave or beam may be directed, which current, impulse, wave or beam is designed to have a disabling effect upon

human beings,” and an item that could, as used, constitute a dangerous weapon capable of inflicting serious bodily injury.” (¶ 32)

FACTUAL BACKGROUND

Hall was angry about a prior family proceeding involving a professional mediator who had previously served as guardian ad litem. He used a woman's voice and false pretenses to lure the mediator to a house, where he appeared disguised as an elderly man and attacked her with a cane containing a high-voltage stun device. Hall had discussed kidnapping people connected to the prior proceeding to obtain money and leave the country with his children and their mother. The attack caused repeated burns that did not heal for approximately three weeks, and Hall fled after the victim resisted.

PROCEDURAL HISTORY

Hall was indicted on aggravated assault, assault, and two counts of attempted kidnapping. At trial, he represented himself with standby counsel. The jury convicted him on the aggravated-assault, assault, and ransom-or-reward attempted-kidnapping counts but could not reach a verdict on the fourth count, resulting in a mistrial on that count. The trial court imposed concurrent and consecutive terms of imprisonment and other financial obligations. The Supreme Judicial Court affirmed the convictions and remanded for dismissal of Count 4, consistent with the parties' intent after the mistrial.

DISPOSITION

affirmed

REMAND INSTRUCTIONS

Remanded for further proceedings to formally dismiss Count 4, the attempted-kidnapping count on which the court declared a mistrial and which the parties intended to dismiss.

CASES CITED

- State v. Hansley, 2019 ME 35, ¶ 2, 203 A.3d 827
- State v. Nobles, 2018 ME 26, ¶ 17, 179 A.3d 910
- State v. Boobar, 637 A.2d 1162, 1166-67 (Me. 1994)
- State v. Rich, 395 A.2d 1123, 1131 (Me. 1978)
- State v. Bowman, 611 A.2d 560, 562 (Me. 1992)
- State v. Hastey, 2018 ME 147, ¶ 23, 196 A.3d 432
- State v. Murphy, 2016 ME 5, ¶ 7, 130 A.3d 401
- State v. Davis, 2018 ME 116, ¶ 29, 191 A.3d 1147
- State v. Hanaman, 2012 ME 40, ¶ 16, 38 A.2d 1278
- State v. Smith, 618 A.2d 208, 210 (Me. 1992)
- State v. Siracusa, 2017 ME 84, ¶ 12, 160 A.3d 531

- State v. Deering, 611 A.2d 972, 974 (Me. 1992)

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