

SUPREME JUDICIAL COURT OF MAINE

State v. Williams

52 A.3d 911 (Me. 2012) · Decided May 3, 2012

SUMMARY

The Maine Supreme Judicial Court affirmed Jeffrey L. Williams’s convictions for intentional or knowing murder and conspiracy to commit murder following a joint trial with codefendants. The court rejected challenges to joinder and severance, admission of coconspirator and redacted grand-jury statements, limits on cross-examination of a cooperating witness, alleged prosecutorial vouching, and the sufficiency of the evidence. Williams was sentenced to life imprisonment for murder and thirty years for conspiracy, to be served concurrently.

CASE DETAILS

COURT	Supreme Judicial Court of Maine
WRITING FOR THE COURT	Alexander, J.; Alexander; Gorman; Jabar; Levy; Mead; Saufley; Silver
JURISDICTION	Maine
DECIDED	May 3, 2012
DISPOSITION	affirmed
PROCEDURAL POSTURE	Williams appealed his convictions for intentional or knowing murder and conspiracy to commit murder following a joint jury trial in the York County Superior Court.
STANDARD OF REVIEW	Severance and joinder decisions are reviewed for an improper exercise of discretion and resulting prejudice. Admission of evidence is reviewed for abuse of discretion. The determination that coconspirator statements were made during the course and in furtherance of a conspiracy is reviewed for clear error or abuse of discretion. Legal conclusions concerning whether statements are nontestimonial are reviewed de novo. Unpreserved prosecutorial-misconduct claims are reviewed for obvious error. Sufficiency of the evidence is reviewed in the light most favorable to the State to determine whether a rational jury could find each element beyond a reasonable doubt.
PRECEDENTIAL VALUE	Published precedential opinion of the Supreme Judicial Court of Maine
PARTIES	Jeffrey L. Williams v. State of Maine

TOPICS

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QUESTIONS PRESENTED

1. Whether the Superior Court abused its discretion or prejudiced Williams's right to a fair trial by denying his motion to sever the joint trial or to conduct a single trial with separate juries.
2. Whether admission of George's pre-conspiracy statements violated Williams's Sixth Amendment confrontation right or required a limiting instruction.
3. Whether George's statements to police after the murder were made during the course and in furtherance of the conspiracy and were admissible under the coconspirator-statement exception.
4. Whether the redacted grand jury testimony of non-testifying codefendant George violated Bruton or otherwise prejudiced Williams.
5. Whether the court improperly prohibited cross-examination of cooperating witness Cassimy about prior arrests.
6. Whether the prosecutor improperly vouched for Cassimy's credibility.
7. Whether sufficient evidence supported Williams's convictions for intentional or knowing murder and conspiracy to commit murder.

HOLDINGS

1. The trial court did not abuse its substantial discretion in denying Williams's motion to sever the trials or his alternative request for separate juries because Williams failed to demonstrate substantial prejudice to his right to a fair trial.
2. George's private, intimate pre-conspiracy statements were nontestimonial and were properly admitted as relevant evidence of motive against both defendants without a limiting instruction.
3. George's statements to police hours after the murder were admissible as coconspirator statements because her fabricated robbery report and misleading descriptions were acts of concealment undertaken during the continuing conspiracy and in furtherance of its objectives.
4. Admission of George's substantially redacted grand jury testimony, accompanied by limiting instructions, did not violate Williams's confrontation rights under Bruton and did not prejudice him.
5. The trial court properly prohibited cross-examination of Cassimy about prior arrests because arrests without convictions were not admissible under Rule 609, and the arrests were not specific conduct probative of truthfulness under Rule 608(b).
6. The prosecutor did not improperly vouch for Cassimy's credibility by acknowledging that Cassimy was poor at recalling dates and times and arguing that the jury could weigh that weakness against his otherwise detailed testimony.

7. The evidence was sufficient to support Williams's convictions for intentional or knowing murder and conspiracy to commit murder.

KEY QUOTATIONS

“For a coconspirator’s out-of-court statement to be admissible, the court must find by a preponderance of evidence that “(1) the statement was made during the course of a conspiracy; (2) the statement was made in furtherance of the conspiracy; and (3) the defendant participated in the conspiracy.”” (52 A.3d at 919)

“If a codefendant’s confession is “redacted to eliminate not only the defendant’s name, but any reference to his or her existence,” coupled with a proper limiting jury instruction, the Confrontation Clause is not violated.” (52 A.3d at 920)

FACTUAL BACKGROUND

Jeffrey Williams, his sister Darlene George, and Rennie Cassimy planned and carried out a simulated home invasion to kill George's husband. Williams and Cassimy traveled from New York to Maine, entered the victim's home, restrained George and her son, and killed the victim by hog-tying him and placing a plastic bag over his head. George then reported a fabricated robbery and gave police misleading descriptions of the assailants. Cassimy later pleaded guilty to conspiracy and cooperated with the State, while George did not testify and Williams denied participating in the crime.

PROCEDURAL HISTORY

Williams, Darlene George, and Rennie Cassimy were indicted in connection with a planned murder. The Superior Court denied Williams's motion to sever the defendants' trials or, alternatively, to conduct a single trial with separate juries. After a ten-day joint trial with George, the jury convicted Williams of murder and conspiracy to commit murder, and the court sentenced him to concurrent terms of life imprisonment and thirty years. The Supreme Judicial Court of Maine affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Townsend, 2009 ME 106, 982 A.2d 345
- State v. Quirion, 2000 ME 103, 752 A.2d 170
- State v. Cook, 2010 ME 81, 2 A.3d 313
- State v. Parsons, 2005 ME 69, 874 A.2d 875
- State v. Lakin, 2006 ME 64, 899 A.2d 777
- State v. Boucher, 1998 ME 209, 718 A.2d 1092
- Bruton v. United States, 391 U.S. 123 (1968)
- United States v. Washington, 318 F.3d 845 (8th Cir. 2003)
- Pointer v. Texas, 380 U.S. 400 (1965)

- Crawford v. Washington, 541 U.S. 36 (2004)
- State v. Rickett, 2009 ME 22, 967 A.2d 671
- State v. Barnes, 2004 ME 105, 854 A.2d 208
- State v. Ducasse, 2010 ME 117, 8 A.3d 1252
- Melendez-Diaz v. Massachusetts, 557 U.S. 305 (2009)
- Bourjaily v. United States, 483 U.S. 171 (1987)
- United States v. Tracy, 12 F.3d 1186 (2d Cir. 1993)
- Krulewitch v. United States, 336 U.S. 440 (1949)
- Grunewald v. United States, 353 U.S. 391 (1957)
- United States v. Serrano, 870 F.2d 1 (1st Cir. 1989)
- United States v. Medina, 761 F.2d 12 (1st Cir. 1985)
- State v. Booth, 250 Conn. 611, 737 A.2d 404 (1999)
- Richardson v. Marsh, 481 U.S. 200 (1987)
- State v. Bridges, 2004 ME 102, 854 A.2d 855
- United States v. Gentles, 619 F.3d 75 (1st Cir. 2010)
- State v. Bowman, 588 A.2d 728 (Me. 1991)
- State v. Ericson, 2011 ME 28, 13 A.3d 777
- State v. Schmidt, 2008 ME 151, 957 A.2d 80
- State v. Ashley, 666 A.2d 103 (Me. 1995)
- United States v. Perez-Ruiz, 353 F.3d 1 (1st Cir. 2003)
- State v. Chesnel, 1999 ME 120, 734 A.2d 1131
- State v. Severy, 2010 ME 126, 8 A.3d 715
- State v. Medeiros, 2010 ME 47, 997 A.2d 95
- State v. Mahaney, 437 A.2d 613 (Me. 1981)

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