

SUPREME COURT OF PENNSYLVANIA

Commonwealth of Pennsylvania v. Harold Walker

No. 13 WAP 2024 (Pa. Aug. 19 2025) · No. 13 WAP 2024 · Decided August 19, 2025

SUMMARY

The Supreme Court of Pennsylvania held that the trial court did not abuse its discretion by allowing the Commonwealth to ask prospective jurors whether they could follow the principle that an alleged victim's testimony alone, if believed beyond a reasonable doubt, may support a sexual-assault conviction. The Court concluded that the question served the proper purpose of determining whether jurors could follow the law, rather than eliciting their likely verdict based on anticipated facts or testing trial strategy. The Court affirmed Harold Walker's judgment of sentence.

CASE DETAILS

COURT	Supreme Court of Pennsylvania
WRITING FOR THE COURT	Chief Justice Todd; Justice Donohue; Justice Dougherty; Justice Wecht; Justice Mundy; Justice Brobson; Justice McCaffery
JURISDICTION	Supreme Court of Pennsylvania
DECIDED	August 19, 2025
DOCKET	13 WAP 2024
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal by allowance from the Superior Court's affirmance of Walker's judgment of sentence following convictions for multiple sexual offenses and related crimes.
STANDARD OF REVIEW	A trial court's ruling concerning the scope of voir dire is reviewed for abuse of discretion, subject to the essential demands of fairness.
PRECEDENTIAL VALUE	Published precedential opinion of the Supreme Court of Pennsylvania
PARTIES	Harold Walker v. Commonwealth of Pennsylvania

TOPICS

jury selection jury instructions standard of review criminal procedure appellate procedure

PRACTICE AREAS

criminal procedure criminal law jury selection sexual offenses evidence

QUESTIONS PRESENTED

1. Whether the trial court abused its discretion by permitting the Commonwealth to ask prospective jurors whether they could follow the legal principle that an alleged sexual-assault victim's testimony, standing alone and if believed beyond a reasonable doubt, may support a conviction.
2. Whether the challenged voir dire question was improper because it sought to determine jurors' likely decisions based on anticipated evidence, functioned as a jury instruction, or misstated or incompletely stated Pennsylvania law.

HOLDINGS

1. In a prosecution for a sexual offense under Chapter 31 of the Pennsylvania Crimes Code, a trial court may permit the Commonwealth to ask prospective jurors whether they can follow the legal principle that the alleged victim's testimony, standing alone and if believed, need not be corroborated and may constitute sufficient proof for conviction.
2. The trial court did not abuse its discretion by allowing a voir dire question that contained a legal principle later addressed in the jury instructions, because the question accurately stated the applicable law and did not need to include every qualification or element applicable to the eventual jury charge.

KEY QUOTATIONS

“However, we conclude that, where a defendant is charged with a sexual offense under Chapter 31 of the Crimes Code, as in the instant case, asking prospective jurors during voir dire if they would be capable of following the established legal principle that the testimony of the victim, standing alone, if believed by the juror, is sufficient proof upon which to find a defendant guilty, is not error.” (19)

“As a final matter, we reject Appellant’s claim that he was prejudiced by the voir dire question posed in the instant case.” (22)

FACTUAL BACKGROUND

Walker occasionally babysat the victim and her infant sister while the victim's mother worked. The victim testified that, beginning when she was ten years old, Walker repeatedly entered her bedroom, removed her underwear, and sexually assaulted her. She disclosed the abuse at age twelve to her mother and grandmothers, later tested positive for a sexually transmitted infection, and disclosed the abuse to a teacher at age sixteen, leading to police involvement.

PROCEDURAL HISTORY

Walker was charged in Allegheny County in 2019 and, before trial, objected to the Commonwealth's proposed voir dire question concerning whether jurors could follow the principle that an alleged victim's uncorroborated testimony, if believed beyond a reasonable doubt, could support a sexual-assault conviction. The trial court denied the objection. A jury convicted Walker on all charges, and the trial court imposed an aggregate sentence of 30 1/2 to 61 years' imprisonment followed by three years' probation. After denial of post-sentence motions, the Superior Court affirmed in a published opinion, and the Supreme Court of Pennsylvania granted allowance of appeal.

DISPOSITION

affirmed

CASES CITED

- Commonwealth v. Walker, 305 A.3d 12 (Pa. Super. 2023)
- Commonwealth v. Knight, 241 A.3d 620 (Pa. 2020)
- Commonwealth v. Richardson, 473 A.2d 1361 (Pa. 1984)
- Commonwealth v. Holt, 273 A.3d 514 (Pa. 2022)
- Commonwealth v. Bomar, 826 A.2d 831 (Pa. 2003)
- Commonwealth v. Ellison, 902 A.2d 419 (Pa. 2006)
- Commonwealth v. Paoello, 665 A.2d 439 (Pa. 1995)
- Commonwealth v. Montalvo, 986 A.2d 84 (Pa. 2009)
- Commonwealth v. Johnson, 305 A.2d 5 (Pa. 1973)
- Commonwealth v. Moon, 132 A.2d 224 (Pa. 1957)
- Commonwealth v. Calhoun, 86 A. 472 (Pa. 1913)
- Commonwealth v. Kingsley, 391 A.2d 1027 (Pa. 1978)
- Commonwealth v. Fisher, 290 A.2d 262 (Pa. 1972)
- Commonwealth v. Lopinson, 234 A.2d 552 (Pa. 1967)
- Marion v. Bryn Mawr Trust Co., 288 A.3d 76 (Pa. 2023)
- Morgan v. Illinois, 504 U.S. 719 (1992)
- Witherspoon v. Illinois, 391 U.S. 510 (1968)
- State v. Ross, 986 N.W.2d 581 (Iowa 2023)
- Commonwealth v. Antill, 2019 WL 2950181 (Pa. Super. Ct. July 9, 2019)
- Commonwealth v. Wilson, 2020 WL 5423952 (Pa. Super. Ct. Sept. 10, 2020)