

SUPREME JUDICIAL COURT OF MAINE

State of Maine v. Bradley Williams

2020 ME 17 (2020) · No. Wal-18-440 · Decided January 30, 2020

SUMMARY

The Maine Supreme Judicial Court affirmed Bradley Williams’s convictions for two counts of stalking and two counts of harassment. The court rejected challenges concerning trial fairness, evidentiary rulings, motions for judgment of acquittal, amendment of the charging complaint, and omitted jury instructions. The court also addressed ethical concerns regarding an unsupported allegation in appellate counsel’s brief.

CASE DETAILS

COURT	Supreme Judicial Court of Maine
WRITING FOR THE COURT	Saufley, C.J.; Alexander, J.; Mead, J.; Gorman, J.; Humphrey, J.
JURISDICTION	Maine
DECIDED	January 30, 2020
DOCKET	Wal-18-440
DISPOSITION	affirmed
PROCEDURAL POSTURE	Williams appealed his jury-trial convictions for two counts of stalking and two counts of harassment, challenging the fairness of the trial, evidentiary rulings, denials of motions for judgment of acquittal, amendment of the criminal complaint, and jury instructions.
STANDARD OF REVIEW	Fair-trial claims are reviewed for whether the challenged conduct fatally infected the trial and denied fundamental fairness. Denial of a motion for judgment of acquittal is reviewed by viewing the evidence in the light most favorable to the State to determine whether a jury could rationally find each element proven beyond a reasonable doubt. Amendment of a criminal complaint is reviewed for abuse of discretion. Unpreserved jury-instruction claims and evidentiary claims are reviewed for obvious error.
PRECEDENTIAL VALUE	published and precedential
PARTIES	Bradley Williams v. State of Maine

TOPICS

criminal procedure

evidence

appellate procedure

due process

standard of review

PRACTICE AREAS

criminal law

criminal procedure

evidence

constitutional law

appellate procedure

QUESTIONS PRESENTED

1. Whether the trial court created a prejudicial trial environment that denied Williams a fair trial.
2. Whether a prior protection-from-harassment judgment in Williams's favor had collateral-estoppel or res judicata effect in the criminal prosecution.
3. Whether the trial court plainly erred by admitting testimony that a civil lawsuit filed by Williams had been dismissed with prejudice.
4. Whether the evidence was sufficient to support the harassment convictions and whether the trial court applied the proper standard in denying the first motion for judgment of acquittal.
5. Whether the trial court abused its discretion by amending the harassment counts to allege that the conduct occurred in Waldo County rather than specifically in Lincolnville.
6. Whether the trial court committed obvious error by failing to give requested jury instructions concerning the State's burden, protected speech, actual malice, and Maine's anti-SLAPP statute.
7. Whether Williams's ineffective-assistance claims could be considered on direct appeal.

HOLDINGS

1. The trial court did not deny Williams a fair trial. Its conduct, viewed in context, did not fatally infect the proceedings or prevent the jury from deciding the facts fairly.
2. The prior protection-from-harassment judgment did not have collateral-estoppel or res judicata effect in the criminal prosecution.
3. The trial court did not commit reversible error by allowing testimony that Williams's lawsuit against a victim had been dismissed with prejudice.
4. The evidence was sufficient for a rational jury to find each element of harassment proven beyond a reasonable doubt, including that Williams intended to harass both victims through the fliers and the June 3, 2016, letter.
5. The trial court did not abuse its discretion by amending the harassment counts to allege that the course of conduct occurred in Waldo County.
6. The trial court committed no obvious error by declining to instruct the jury on the requested burden-of-proof, protected-speech, actual-malice, and anti-SLAPP issues.
7. The court declined to consider Williams's ineffective-assistance claims on direct appeal.

KEY QUOTATIONS

“denial of due process is the failure to observe that fundamental fairness essential to the very concept of justice. In order to declare a denial of it we must find that the absence of that fairness fatally infected the

trial; the acts complained of must be of such quality as necessarily prevents a fair trial.” (¶ 12)

“The court may permit a complaint to be amended at any time before verdict or finding if no additional or different crime is charged and if substantial rights of the defendant are not prejudiced.” (¶ 22)

“Jury instructions must inform the jury correctly and fairly in all necessary respects of the governing law.” (¶ 24)

FACTUAL BACKGROUND

Williams repeatedly appeared at the victims’ home and business, sent letters describing visions of one victim’s death and making threats and accusations, posted fliers around Belfast accusing one victim of being an unprosecuted criminal, and sent a later threatening letter. The victims obtained cease-harassment notices and took extensive safety precautions; one victim sought treatment for anxiety. Williams was convicted after the State presented evidence that his conduct constituted stalking and harassment.

PROCEDURAL HISTORY

Williams was charged in the Waldo County Unified Criminal Docket with two counts of stalking and two counts of harassment. After electing to represent himself with standby counsel, he was convicted on all four counts following a jury trial. The trial court imposed concurrent and partially suspended jail sentences, probation, restitution to the Victims’ Compensation Fund, and a concurrent contempt sentence. Williams timely appealed, and the Supreme Judicial Court of Maine affirmed.

DISPOSITION

affirmed

CASES CITED

- Petgrave v. State, 2019 ME 72, ¶ 10, 208 A.3d 371
- State v. Woodard, 2013 ME 36, ¶ 19, 68 A.3d 1250
- Lisenba v. California, 314 U.S. 219, 236 (1941)
- State v. Hughes, 2004 ME 141, ¶¶ 2, 5-6, 863 A.2d 266
- State v. Pabon, 2011 ME 100, ¶ 29, 28 A.3d 1147
- State v. Adams, 2015 ME 30, ¶ 19, 113 A.3d 583
- State v. Johnson, 585 A.2d 825, 826 (Me. 1991)
- State v. Siviski, 663 A.2d 568, 570 (Me. 1995)
- State v. Johnson, 2005 ME 46, ¶¶ 15-16, 870 A.2d 561
- State v. Lajoie, 2017 ME 8, ¶ 13, 154 A.3d 132
- State v. Tucker, 2015 ME 68, ¶ 11, 117 A.3d 595
- State v. Pelletier, 2019 ME 92, ¶ 9, 210 A.3d 177
- Childs v. Ballou, 2016 ME 142, ¶¶ 17, 24-27, 148 A.3d 291

- State v. Cropley, 544 A.2d 302, 304-05 (Me. 1988)

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