STATE OF MAINE
AROOSTOOK, ss.

SUPREME JUDICIAL COURT
SITTING AS THE LAW COURT
DOCKET NO. ARO-23-418

STATE OF MAINE,

APPELLEE

V.

KEARA M. BERNIER

APPELLANT

ON APPEAL FROM THE UNIFIED CRIMINAL DOCKET

BRIEF OF APPELLEE

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INTRODUCTION

Following a two-day jury trial, Keara Bernier was found guilty of Aggravated Assault, held September 14-15, 2023, after she hit her boyfriend, Robert Wiezbicki, in the head with a baseball bat on June 5, 2022.

Following the presentation of the evidence the court provided its proposed jury instructions to Maine and to the Defense. The Defense objected to a deadly force in defense of self instruction being provided at all. The Defense now contends that it was obvious error to not include the dwelling place language within the deadly force instruction. That instruction was not generated because Ms. Bernier never feared the use of deadly force against her and did not otherwise support its imminent use. Further, the Defendant's counsel, did not request the instruction.

A baseball bat, swung in a chopping motion onto Mr. Wiezbicki's head, is a dangerous weapon capable of inflicting a substantial risk of death or serious bodily injury.

The Court should affirm the decision of the lower court.

STATEMENT OF FACTS

Robert Wiezbicki and Keara Bernier had known each other for about 2 years by the time that she hit him on the head with a baseball bat (Tr. T. (vol. 1) at 48). Within a few weeks after their initial meeting, they developed a relationship and not long after she had moved into his home with her three children, at some point one child moved to live with her father (Tr. T. (vol. 1) at 49-51). Initially, Ms. Bernier contributed to the household bills, but not for long. (Tr. T. (vol. 1) at 52). For months prior to her swing, Mr. Wiezbicki had been asking Ms. Bernier to leave weekly, for months (Tr. T. (vol. 1) at 52-53). Ms. Bernier did not take being asked to leave seriously (*Id*.) Just prior to Ms. Bernier hitting Mr Wiezbicki in the head there had been a significant amount of yelling, but it only became physical when she hit him with a baseball bat. (Tr. T. (vol. 1) at 93). In the afternoon of June 5th, 2022, Mr. Wiezbicki had been smoking by his stove, having a beer, while Keara Bernier was in her vehicle outside talking on her tablet with someone, she had been speaking to a male individual for several days by that point. (Tr. T. (vol. 1) at 53-54). Mr. Wiezbicki took hampers of her clothes out onto the porch and returned to his place by the stove to have a cigarette. (Tr. T. (vol. 1) at 54). Mr. Wiezbicki testified that he had consumed about a 6-pack by that time, not an unusual weekend day for

him. (Tr. T. (vol. 1) at 92). 10-15 minutes later, Ms. Bernier came into the house complaining about her stuff being on the porch, Mr. Wiezbicki told her she needed to leave, angering her, she went to retrieve her bat from the closet and hit Mr. Wiezbicki, the blood started pouring from Mr. Wiezbicki's head and stained the baseball hat he was wearing; Mr. Wiezbicki did not attempt to stop her from hitting him, not believing she would actually do it;. (Tr. T. (vol. 1) at 55-56, 58, 60, 80-81 95-96). Mr. Wiezbicki testified that after Ms. Bernier hit him, Ms. Bernier appeared to regret what she had done, she apologized, helped Mr. Wiezbicki to bandage the wound, and they then ignored each other for the rest of the night. (Tr. T. (vol. 1) at 57-58). The bleeding did not stop for hours following the contact. (Tr. T. (vol. 1) at 62). Mr. Wiezbicki showed his scar from the incident to the jury (Tr. T. (vol. 1) at 57). At no time did Ms. Bernier testify that Mr. Wiezbicki was about to use deadly force against her.

ISSUES

I. **Reminding witnesses of their obligation to testify truthfully is not a violation of their constitutional rights, nor is telling them to answer the question**

II. **When a jury instruction is not generated, its provision is not appropriate**

III. **A baseball bat swung at someone's head is a dangerous weapon**

ARGUMENT

I. Reminding witnesses of their obligation to testify truthfully is not a violation of their constitutional rights, nor is telling them to answer the question

Unpreserved errors are reviewed by this Court under an obvious error standard of review. See State v. Brine, 1998 ME 191, ¶13, 716 A.2d 208, 212 15 (Me. 1998); State v. Thomes, 1997 ME 146, ¶ 7, 697 A.2d 1262, 1264 (Me. 1997); State v. Philbrick, 669 A.2d 152, 156 (Me. 1995); State v. Bedrin, 634 A.2d 1290, 1292 (Me. 1993); State v. Shackelford, 634 A.2d 1292, 1295 (Me. 1993); State v. Naoum, 548 A.2d 120, 125 (Me. 1988); State v. Rowe, 238 A.2d 217, 225 (Me. 1968); M.R.Crim.P. 52(b).

The obvious error standard was explained by this Court in *State v. Pabon*, 2011 ME 100, that articulation is produced in below:

"Where no party objects to an alleged error at trial, "[o]bvious errors or defects affecting substantial rights" may still be addressed on appeal. M.R.Crim. P. 52(b)…

Thus, the obvious error standard (1) calls for an evaluation of the error in the context of the entire trial record to determine (2) whether the error was so seriously prejudicial that it is likely that an injustice has occurred:

The obvious error standard requires the reviewing court to make a penetrating inspection of all the circumstances of the trial to determine whether there exists a seriously prejudicial error tending to produce manifest injustice.

…

State v. Pabon, 2011 ME 100, ¶¶ 18-19, 28 A.3d 1147, 1151–54 (internal citations omitted)

"The judicial deference owed jury decisions demands an appellate standard of review more rigorous than one narrowly focused on whether it was reasonably possible that the jury would have returned a different verdict.

The case for a more demanding obvious error test is also supported by the principles underlying Rule 52(b), which are identical to the principles underlying the federal rule for reviewing plain error. *Compare* M.R.Crim. P. 52(b), *with* Fed.R.Crim.P. 52(b). The federal rule provides: "A plain error that affects substantial rights may be considered even though it was not brought to the court's attention." Fed.R.Crim.P. 52(b). Obvious error and plain error are substantively alike. *State v. Burdick,* 2001 ME 143, ¶ 13 n. 9, 782 A.2d 319. The United States Supreme Court has emphasized that the language of Federal Rule 52(b) is permissive, but that courts should exercise their remedial discretion under the rule only where an unpreserved error affects substantive rights and "seriously affect[s] the fairness, integrity or public reputation of judicial proceedings." *United States v. Olano,* 507 U.S. 725, 736, 113 S.Ct. 1770, 123 L.Ed.2d 508 (1993) (alteration in original) (quotation marks omitted).

In 2001, we quoted and applied the Supreme Court's formulation of the obvious error standard in *Burdick:*

For an error or defect to be obvious for purposes of Rule 52(b), there must be (1) an error, (2) that is plain, and (3) that affects substantial rights. If these conditions are met, we will exercise our discretion to notice an unpreserved error only if we also conclude that (4) the error seriously affects the fairness and integrity or public reputation of judicial proceedings.

Id., ¶ 24-29, 28 A.3d 1147, 1151–54 (internal citations omitted)

The Defendant argues the judge in this matter violated impartiality and uniquely imposed himself upon her in the proceedings. In doing so she cites *State v. Lint,* 361 A.2d 926, 927 (Me. 1976), where, "The Justice presiding at trial took it upon himself to examine the defendant's sole supporting witness as on cross-examination."

State v. Lint, 361 A.2d 926, 927 (Me. 1976)

The Defendant also seeks to rely upon *State v. Annis*, 341 A.2d 11, (Me. 1975),

where:

"Following this cross-examination, the presiding Justice undertook an extensive examination of the defendant in which he asked the defendant a series of some 45 questions concerning the incident at the car and defendant's failure to produce Mr. Simpson as a witness. At the conclusion of the Justice's interrogation, defendant's attorney moved, unsuccessfully, for a mistrial.

The persistent quality of the questions disturbs us more than their number."

State v. Annis, 341 A.2d 11, 12–13 (Me. 1975)[1]

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[1] What the Defendant did not seek to do was to reproduce the footnote from *Annis*, demonstrating that the questions were both leading and went directly to the Defendant's credibility:
THE COURT: Did I understand you to say in answer to a question by Mr. Barr that you didn't hear them talking, that you were looking through the windshield?
A: Well, what he had asked me, he said if I had heard him say anything, if I was close enough where I could hear them say anything, and I told him no, because at the time I was talking to Jim, and they weren't talking to each other.
THE COURT: Yes, but just prior to that, you said you didn't hear what they were saying, you were looking through the windshield. Didn't you say that?
A: No, sir.
THE COURT: You didn't say that?
A: No.
THE COURT: I misunderstood then.
A: I said that I was talking toward the windshield. He asked me if I had seen any transaction, and I told him 'no'.
THE COURT: But you did see them in the car?
A: Yes, I did.
THE COURT: You were out there?
A: Yes, I was.
THE COURT: You don't know what was going on, you say?
A: I went downstairs to find out where he was going.
THE COURT: And they were in the car?
A: Yes.
THE COURT: And you were there at the car?
A: Yes, I was.
THE COURT: Was there anyone else with you?
A: Tim Simpson was standing on the porch. He came down a couple of minutes after me.
THE COURT: Tim Simpson came down a couple of minutes after you?
A: Yes.

THE COURT: So there was a time when just the three of you were there? Is that correct?
A: Yes.
THE COURT: And where was Mr. Moore?
A: In the driver's seat.
THE COURT: In the driver's seat?
A: Yes.
THE COURT: And where was Mr. Bellemore?
A: In the passenger side.
THE COURT: And where were you?
A: Outside the car.
THE COURT: Which side? The passenger side, or the driver's side?
A: The passenger side, in front of the door.
THE COURT: On the passenger's side, in front of the door?
A: Towards the front of the hood of the car, 'cause there's a drop-off where the car was parked.
THE COURT: And then sometime after that, Mr. Simpson came down?
A: Yes.
THE COURT: So that there was, no question in your mind, there was a time when just the three of you were there before Mr. Simpson came?
A: Right.
THE COURT: And you saw no transaction?
A: No, I didn't.
THE COURT: And you did not participate in a transaction?
A: No.
THE COURT: And you didn't know what they were doing in a car?
A: No, I did not. For all I knew he could have been asking him for a ride some place.
THE COURT: You saw them go out together?
A: Yes, I did.
THE COURT: And as they started out didn't it occur to you to ask them where they were going?
A: Well, I was with Mr. Simpson, I told him to wait a minute and I went down a few minutes after they went down.
THE COURT: And this Mr. Simpson lives in Augusta, you say?
A: I think he does, to my knowledge.
THE COURT: When were you notified to be here today?
A: Last night.
THE COURT: What time?
A: I got the message about 4 o'clock, or 3 o'clock.
THE COURT: Three, four, or five o'clock in the evening?
A: Yes. And I was in Poland, and I had no transportation at the time.
THE COURT: What time did you come into town this morning?
A: Well I had my friend-I finally made it in around ten o'clock, I guess it was, and I stayed at his place, and I came in this morning.
THE COURT: You made it in about ten o'clock last night?
A: Ya, someone give me a ride last night. Jim Moore.
THE COURT: Last night?
A: Right.
THE COURT: You were at Jim Moore's last night?
A: At Monmouth, yes, sir.
THE COURT: Did you talk to him about coming to Court today?
A: No, I did not. Just about coming in. We were trying-
THE COURT: You talked with him about both of you coming to Court today, didn't you?
A: Ya, I did.

The Defendant also seeks to rely upon *Price v. State*, 310 Ga. App. 132, (2011), where the court directly questioned the Witness about whether they she was lying:

THE COURT: Are you lying under oath up here?

THE WITNESS: No, ma'am.

THE COURT: Would you lie under oath for—

THE WITNESS: No, ma'am.

THE COURT:—for Dr. Levy and his wife—

THE WITNESS: No, ma'am.

THE COURT:—or his firm?

THE WITNESS: No, ma'am.

THE COURT: Everything you've said has been truthful?

THE WITNESS: Yes, ma'am. *Id. at* 136–37.

THE COURT: Did either one of you talk about getting a hold of Tim Simpson, bringing him in?
A: Yes, we did.
THE COURT: Did you come into town looking for him last night?
A: We tried calling, but we couldn't get hold of him.
THE COURT: Where did you try to call?
A: Well, I really didn't try that hard, 'cause the last time I heard that he was in the county jail, and my lawyer was going to subpoena him to come to court today.
THE COURT: When did your lawyer tell you that?
A: This morning. And I went out this morning to look for him. This afternoon, I mean.
THE COURT: You went out to look for him?
A: Yes, I did.
THE COURT: Where did he go?
A: Just around to his girl friend's, to Rap and Rescue, and down to the park.
THE COURT: And you didn't find him?
A: No.
THE COURT: Did you find out where he is?
A: No, we did not.
THE COURT: So as far as you know he is not available?
A: Not at present, no.'

These cases stand in stark contrast to the questioning that the court put before Ms. Bernier, questions that were solely directed at getting her to answer the questions already posed to her. The Court will be reviewing the entire transcript as required for the obvious error standard of review, and what it will find is that Ms. Bernier simply would not answer the questions directed to her and the examples are sundry, it was only in the face of this stubbornness that the court sought to intervene. The Defendant had the opportunity, and the right, to testify and she took full advantage of it. Maine then had the right to cross-examine her when she availed herself of that right, by circumlocution she sought to avoid the questions posed to her, in its intervention the court simply sought of the Defendant to answer the questions asked.

The Defendant seeks to direct the Court's attention to the court's instructions to the Defendant to testify truthfully. She concedes in her brief that the court impugn her veracity. What she does not seek to do is to show the initial interaction, a fault of the prosecution at the outset of the trial, that first led the court to instruct Mr. Wiezbicki on his obligation to testify truthfully:

Earlier, during the State's case in chief, the Court likewise instructed the victim of his absolute obligation to testify truthfully, rather than "as honestly as you can" as initially suggested by the State. Under the obvious error standard, it was no more an error for the Court to instruct the Defendant in her obligation than it was to instruct Mr. Wiezbicki and reminding a witness, Defendant or no, of their obligation to testify truthfully. Doing so does not affect the fairness, integrity or public reputation of judicial proceedings.

II. When a jury instruction is not generated, its provision is not appropriate

Looking at the evidence in the light most favorable to the State (*State v. Fletcher,* 2015 ME 114, ¶ 12, 122 A.3d 966, 970), the jury had competent evidence supporting its conclusion that Ms. Bernier committed Aggravated Assault by striking Mr. Wiezbicki in the head with a baseball bat, and that she was not acting in self-defense when she did so.

The obvious error standard, noted above, also applies to whether the provision of a jury instruction was appropriate. The Defendant argues that she was entitled to the jury instruction that she was not required to retreat from her dwelling place. Several parts of this plaint take certain facts for granted: 1) that it was still her dwelling place; 2) that she reasonably, 3) believed it

necessary to defend herself with the use of deadly force and 4) reasonably believed the use of deadly force was necessary to defend herself from, 5) deadly force was about to be used upon her, and that she had not 6) provoked the use of deadly force. The instruction, however, was not generated by the evidence adduced at trial.

"Whenever a jury instruction regarding self-defense is requested, the trial court must consider two interrelated questions. The court must determine whether self-defense is in issue at all and, as it does so, the court will also need to consider whether deadly or non-deadly force is implicated." *State v. Ouellette*, 2012 ME 11, ¶ 12, 37 A.3d 921, 927

The court here determined that self-defense was an issue.

"When the court is unable to determine whether the defendant used deadly or nondeadly force as a matter of law, the court must instruct the jury as to both and allow the jury to make the preliminary determination of whether the defendant used deadly or nondeadly force."

Id. at 928

Unable to determine the use of force as a matter of law, the court provided both instructions.

To make its decision, the court determines whether sufficient evidence has been generated that is "of such nature and quality" to render "the existence of all facts constituting the defense a reasonable hypothesis for the fact finder to entertain." The trial court thus considers whether there is some evidence to support each element of one form of self-defense, and which instruction—deadly or nondeadly—is generated by that evidence. In doing so, the trial court must view the facts in the light most favorable to the defendant and resolve all reasonable inferences in the defendant's favor. "[T]he court should have suspended its disbelief and assumed that [the defendant's] story was

true.").

Id. at 927 (internal citations omitted)

Both the Defendant and her victim agreed that their relationship had deteriorated and that he had asked her to leave in January of 2022, by that time they had lived together for about a year. Mr. Wiezbicki testified that on the day that the Defendant attacked him with a baseball bat, Ms. Bernier was out in her vehicle communicating with someone and that he gathered her belongings and placed them on the porch. When Ms. Bernier came to confront him about her belongings' presence upon the porch, a fact with which she agreed, he told her to take her things and leave. His home may no longer have been her dwelling place – but it was always his dwelling place in which he had every right and privilege to occupy. Ms. Bernier turned then and reached for her bat. She struck her victim in the head with the bat with enough force to make him bleed for hours. The jury's verdict that Ms. Bernier a dangerous weapon, one which was capable of producing death or serious bodily injury in the manner used, is fully supported by the evidence *and* establishes that she used deadly force against the victim in *his* dwelling place. Therefore, deadly force in defense of self was unavailable to the Defendant as a matter of law.

The second assumed fact by the Defendant, she was not confronted by her victim "about to use unlawful, deadly force against" her nor did the Defendant believe that Mr. Wiezbicki "entered or (was) attempting to enter a dwelling place or has surreptitiously remained within a dwelling place without a license or privilege to do so; **and** that deadly force is necessary to prevent the infliction of bodily injury by such other person upon the person or a 3rd person present in the dwelling place."

The relevant portions statute related to defense of the person is reproduced below, with emphasis added:

2. A person is justified in using deadly force upon another person:

A. When the person reasonably believes it necessary and reasonably believes such other person is:

(1) About to use unlawful, deadly force against the person or a 3rd person; or

(2) Committing or about to commit a kidnapping, robbery or a violation of section 253, subsection 1, paragraph A, against the person or a 3rd person; or

B. When the person reasonably believes:

(1) That such other person has entered or is attempting to enter a dwelling place or has surreptitiously remained within a dwelling place without a license or privilege to do so; and

(2) That deadly force is necessary to prevent the infliction of bodily injury by such other person upon the person or a 3rd person present in the dwelling place;

C. However, a person is not justified in using deadly force as provided in paragraph A if:

…

(3) The person knows that the person or a 3rd person can, with complete safety:

(a) Retreat from the encounter, except that the person or the 3rd person is not required to retreat if the person or the 3rd person is in the person's dwelling place and was not the initial aggressor;

Me. Rev. Stat. tit. 17-A, § 108

Here, the evidence, even when taken in the light most favorable to the defendant, simply does not establish that Ms. Bernier reasonably believed it necessary to defend herself with deadly force or reasonably believed Mr. Wiezbicki was about to use unlawful deadly force against her. The dwelling place exception was simply not generated by the evidence of the case. This is why trial counsel did not ask for the instruction- he did not believe that his client used deadly force or that she was confronted by it. The first belief continues to be reflected in the third argument of Ms. Bernier's brief – that a bat is not a dangerous weapon. Moreover, trial counsel, read the jury instructions and on two separate occasions objected to the deadly force instruction being given at all. Had that view been adopted by the Court then the dwelling place exception instruction could not have been given. Had that view been adopted by the jury, then the exception would have been wholly irrelevant.

Ms. Bernier was not entitled to the instruction on the dwelling place exception. Under the obvious error standard, not only was there no obvious error, but there simply was no error as Ms. Bernier was not threatened with deadly force nor by any degree of force from an unlawful intruder. The first step in the obvious error standard not being met, the Court need not proceed to the other three.

Indeed, the evidence before the Court, and previously before the jury, is far more redolent of retaliation. Ms. Bernier says herself that she entered the residence to confront her victim about her belongings being placed on the porch. Once there, he told her to leave his home, she responded by grabbing a bat and smiting Mr. Wiezbicki on the head as an act of offense rather than of defense.

III. A baseball bat swung at someone's head is a dangerous weapon

"When reviewing a judgment for sufficiency of the evidence, we view the evidence in the light most favorable to the State [to] determin[e] whether the fact-finder could rationally have found each element of the offense beyond a reasonable doubt." State v. Cummings, 2017 ME 143, ¶ 12, 166 A.3d 996, 999 (Me. 2017) (internal citations and quotations omitted); ("[i]n reviewing the sufficiency of the evidence to support a verdict, we give due deference to the jury's evaluation of the evidence, resolve all factual questions in favor of the jury's verdict, and then 'determine whether there was credible evidence from which the jury would be justified in believing beyond a reasonable doubt that

the defendant was guilty.'"). "The fact-finder is permitted to draw 'all reasonable inferences from the evidence.'" *State v. Drewry*, 2008 ME 76, ¶ 32, 946 A.2d 981, 991 (Me. 2008). (internal citations omitted)

The indictment read: "On or about June 06, 2022, in T16 R 5, Aroostook County, Maine, **KEARA M. BERNIER** did intentionally, knowingly, or recklessly cause bodily injury to Robert Wiezbicki with the use of a dangerous weapon, a baseball bat."

The Defendant argues that the baseball bat used to strike Mr. Wiezbicki in the head did not constitute a dangerous weapon in the manner that it was used. This contention is neither supported by fact nor law; see:

Defendant grabbed an aluminum baseball bat and hit the Defendant in the hands. *State v. Winchenbach*, 658 A.2d 1083 (Me. 1995); bind-over proceedings for a juvenile case where the defendant killed his victim by a baseball bat swung in the back of his head. *State v. Rosado*, 669 A.2d 180, 183 (Me. 1996); baseball bat resulting in death of victim across the bridge of victim's nose. *State v. Graham*, 2004 ME 34, 845 A.2d 558. Following the bat being hitting his head Mr. Wiezbicki bled for hours, he went to work where when others saw him they insisted that he call the police, exhibits were entered into evidence showing the injury the following day, and at trial he bore the mark of that strike upon his forehead and showed it to the jury.

CONCLUSION

For the above reasons the Appellee asks the Court to affirm its judgement.

CERTIFICATE OF SERVICE

I, John Inglis, Assistant District Attorney, certify that I have mailed two copies of the foregoing "BRIEF OF THE APPELLEE" to the Appellant's attorneys of record, Jeremy Pratt, Esq. and Ellen Simmons, Esq.

DATED: August 6, 2024

_____

JOHN INGLIS
Assistant District Attorney
Maine Bar No. 6420