IN THE COURT OF APPEALS OF THE STATE OF MISSISSIPPI
NO. 2008-KA-01398-COA

JAMES KENDRICK — APPELLANT

V.

STATE OF MISSISSIPPI — APPELLEE

**CERTIFICATE OF INTERESTED PERSONS**

The undersigned counsel of record certifies that the following listed persons have an interest in the outcome of this case. These representations are made in order that the justices of this court may evaluate possible disqualifications or recusal.

1. State of Mississippi
2. James Kendrick

THIS 4th day of February, 2009.

Respectfully submitted,

JAMES KENDRICK

By: George T. Holmes

George T. Holmes,
Mississippi Office of Indigent Appeals

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## STATEMENT OF THE CASE

This appeal proceeds from the Circuit Court of Sunflower County, Mississippi where James Kendrick was convicted of aggravated assault. A jury trial was conducted July 2, 2007, with the Honorable Betty Sanders, Circuit Judge, presiding. James Kendrick was sentenced to fifteen (15) years imprisonment and is presently incarcerated with the Mississippi Department of Corrections. [R. 43].

## FACTS

On August 21, 2006, Derwin Bozeman, an inmate at the state penitentiary at Parchman, was working on the plumbing in a pipe chase running between two cells at the high security Unit 32. [T. 18-19, 47 ]. When he finished adjusting the pressure for a particular cell, Derwin walked towards his supervisor who was down the hall. [T. 20-21].

As he walked, Derwin said he felt a punch to his neck, but he kept walking. [T. 21-22, 47]. Derwin told the supervisor what happened. [T. 22-23]. The supervisor noticed a small injury to Derwin's neck, so Derwin was taken to administration, then to the hospital unit at Parchman and eventually to Bolivar County Medical Center in Cleveland. [T. *Id.*, 26, 34 149]. No medical testimony nor medical records were ever offered.

When prison officials reviewed security video, they noted what appeared to them to be an object come out of one of the cells and poke Derwin. [T. 37, 47-48, 53; Ex. 1]. The object appeared to be draped with a towel or cloth. *Id.*

The video, according prison officers, also showed something being passed between cells just after Derwin's incident; but, this was not visible in the video published to the jury in Exhibit 1. [Ex. 1; T. 64-72]. Officers also concluded, based on cell numbers they alleged were on tiles in the floor, that the draped object that struck Derwin came from James Kendrick's cell. [T. 43]. Yet, no cell numbers appear on the tiles in Exhibit 1, and the wall markings are illegible. [Ex. 1; T. 64-72].

A search of seven cells in Unit 32 produced a total of seven prisoner-made blade devices commonly referred to as "shanks", two of which came from James Kendrick's cell, 57, and one from the adjacent cell, 56. [T. 107, 111,133]. Some of the state witnesses said that the shank from 56 had a red substance on it, some said it did not. [T. 100, 109, 113, 134-35].

James Kendrick had crutches due to a foot injury. [T. 99]. State witnesses said

they seized James Kendrick's crutches, but crutches were never offered into evidence. [T. 50, 90, 94]. Nothing was found in or on the crutches *Id.*

## SUMMARY OF THE ARGUMENT

The state did not introduce enough competent evidence to support a conviction of aggravated assault. The court allowed improper opinion evidence concerning the alleged injuries to the victim and key jury instructions conflicted.

## ARGUMENT

### ISSUE NO. 1: WHETHER THE VERDICT IS SUPPORTED BY THE EVIDENCE?

Under Miss. Code Ann. §97-3-7(2), "[a] person is guilty of aggravated assault if he (a) attempts to cause serious bodily injury to another, or causes such injury purposely, knowingly or recklessly under circumstances manifesting extreme indifference to the value of human life; or (b) attempts to cause or purposely or knowingly causes bodily injury to another with a deadly weapon or other means likely to produce death or serious bodily harm." James Kendrick's position is that the evidence was insufficient here to prove him guilty of aggravated assault.

In *Bush v. State*, 895 So.2d 836, 844 (¶18) (Miss. 2005), the Supreme Court said that in reviewing a claim of insufficient evidence that it will only reverse if the trial court

court verdict "is so contrary to the overwhelming weight of the evidence that to allow it to stand would sanction an unconscionable injustice." [citing *Herring v. State*, 691 So.2d 948, 957 (Miss.1997)]. The evidence is to be viewed in a light "most favorable to the verdict". *Id.*

"In reviewing a sufficiency of the evidence claim, the Court considers the evidence in the light most favorable to the verdict. *Bush v. State*, 895 at 844 (¶ 16). 2005). If any reasonable trier of fact could have found the essential elements of the crime beyond a reasonable doubt, we uphold the verdict. *Id.*"

*Video Evidence*

Here, the prosecution never presented an eye witness who identified James Kendrick as the assailant nor the exact location of the alleged assault. Derwin Bozeman could only relate what people told him about the specifics of the incident and could not even report the location of the alleged assault . [T. 21-22, 27-30]. This left the state dependent on the grainy video evidence of Exhibit 1.

It was established that the doors to the cells in that hallway were sealed with sheet metal and had only a trap door through which a food tray was passed. [T. 61-62]. This narrowed the location of the incident down significantly so that it could only have happened directly in front of any assailant's cell.

The incident viewable on the tape happened at a far end of a hallway. It is

impossible to tell from whence the object which allegedly struck Derwin came. Derwin never broke his stride nor turned to look in the direction of the poke to his neck. [Ex. 1].

The state offered Department of Correction Investigator interpretations of the what the tape showed as to the location of the incident based on number reportedly placed on tiles in front of the cells. [T. 37, 43, 47-48, 53; Ex. 1]. The video evidence, however, admittedly does not show what the officers who testified about the video suggested it did, because there are no cell numbers visible on the tiles and the video does not appear to show anything being passed between cells after the incident. [Ex. 1, T. 64-72 ]. Arguably the video was not what its sponsor represented it to be.

Without the state's interpretation of the video, there is no evidence that the incident happened directly in front of James Kendrick's cell. The state's position was that James Kendrick fashioned a "spear" out of a crutch, but no crutch was ever introduced into evidence nor shown to the jury. [T. 50, 90, 94]. It was never established that James Kendrick's crutch would even fit through the tray opening in the door, nor whether it was long enough to reach almost all the way across the hallway where Derwin was walking.

*No Medical Evidence proving serious injury*

The state never proved what Derwin's injuries were nor whether any injury was serious enough to meet the statutory definition of aggravated assault. There was no

testimony which established the proximate cause of any alleged serious injury to Derwin. No medical testimony or records were offered, even though they were readily available since Derwin supposedly went to the prison hospital and also at Bolivar County Medical Center. [T.129-30, 148-50]. Bozeman walked away from the alleged assault as if nothing happened. [Ex. 1; T. 61]. There was no bleeding, but some local swelling. [T. 148-49]. After the incident Bozeman complained of trouble breathing and lingering numbness of the tongue. [T. *Id.*, 24].

*No Statutory Proof of Dangerous Weapon*

There was no proof that a dangerous weapon was used to cause any injury to Derwin, particularly there was no proof that "a spear" was used as alleged in the indictment. [R. 6 ]. Even with the suggestion that a crutch was used to cause the injury, a crutch does not necessarily meet the definition of a spear; because, the state never produced proof that the so-called shank could be or was ever actually attached to any crutch.

*Analysis*

This is not a case of the jury resolving conflicting evidence or testimony. In this case, the testimony is so insufficient that it does not support the conviction. The lack of evidence here makes any conclusion consistent with the verdict speculative.

Looking at the facts of this case in the light most favorable to the state, no reasonable, hypothetical juror could find James Kendrick guilty, beyond a reasonable doubt and to the exclusion of every reasonable hypothesis consistent with innocence. It follows that the jury's verdict is not supported by credible evidence and is contrary to the overwhelming weight of evidence.

In *Gilmore v. State,* 772 So.2d 1095, 1099 (¶¶ 10-11) (Miss. Ct. App. 2000), there was no evidence that the defendant used a weapon to injure the victim's leg during an alleged armed robbery. It was dark, no one saw the defendant with any weapon and the injury to the victim "occurred during the course of a struggle." *Id.* That the victim in *Gilmore* was purposely injured during a robbery was nothing more than a possibility and "convictions cannot be sustained upon mere possibilities." [citing *Westbrook v. State*, 202 Miss. 426, 32 So.2d 251, 252 (1947).] The *Gilmore* court, however, did find the evidence supported a simple robbery so rendered a conviction for robbery with remand for resentencing.

Due to the lack of evidence in this case and the speculation which is the basis of the verdict, *Gilmore* is analogous. Similarly to *Gilmore,* not only were the nature and extent of any alleged injuries not shown, but there was no proof that any injury to Derwin was proximately caused by James Kendrick.

In the murder case of *Edwards v. State*, 736 So. 2d 475, 484-85 (¶¶32-37) (Miss. Ct. App.1999), the Court held that the evidence was sufficient to survive directed verdict

but was too dubious for a guilty verdict. The overwhelming evidence did not however establish Edwards's innocence either. The *Edwards* court said even though "weighing evidence is solely the jury's function [citation omitted], ...[w]e are nonetheless here left with the firm belief that to allow this conviction to stand based on this evidence is an unconscionable injustice. *Id.* The same result should come in the present case.

*Arguendo*, even if the state proved who committed the assault, there remains a void of proof of serious injury, so, at best Kendrick's conviction should have been simple assault, not aggravated assault. According to Miss. Code Ann. §97-3-7(1) (Rev.2006), "[a] person is guilty of simple assault if he (a) attempts to cause or purposely, knowingly or recklessly causes bodily injury to another; or (b) negligently causes bodily injury to another with a deadly weapon or other means likely to produce death or serious bodily harm...."

In *Bright v. State,* 986 So.2d 1042, 1048 (¶24-25) (Miss. App. 2008), the court pointed out that, "Mississippi cases have explained on several occasions that aggravated assault under section §97-3-7(2)(a) and simple assault under §97-3-7(1)(a) are distinguished mainly by the extent of the victim's injury, *i.e.*, whether the victim suffered 'bodily injury' or 'serious bodily injury' and the question of whether an alleged victim suffered "bodily injury" or "serious bodily injury" resulted is a question for the jury." [Citations omitted.]. See also, *Taylor v. State*, 577 So.2d 381, 383-84 (Miss.1991).

As to Derwin's injuries, just because he obtained medical treatment does not make

the case automatically aggravated assault or nothing. See *Johnson v. State,* 754 So.2d 576, 578 (¶¶ 5,8), (Miss. Ct. App. 2000), [the defendant was convicted of simple assault on a law enforcement officer, who "testified as to his injuries, including that he required surgery to repair his broken nose." Also, *Graves v. State*, 984 So.2d 1035, 1040 (¶13) (Miss. App., 2008), [victim of a simple assault had a broken leg.]

The trial court in the present case should have granted the defense's motion for JNOV. [R. 46-47 ]. *Sheffield v. State*, 749 So.2d 123, 127 (¶15) (Miss.1999). Looking at the state's case in the best possible light, without proof of the nature, extent or proximate cause of any alleged injury to Derwin and without proof of the use of a spear or other dangerous weapon, the only verdicts justified by the evidence are not guilty or guilty of simple assault. So, the Court is respectfully asked to reverse and render an acquittal or a verdict of simple assault with remand for resentencing.

## ISSUE 2: WHETHER IT WAS ERROR TO ALLOW LAY MEDICAL OPINION AND HEARSAY?

James Kendrick was irreparably prejudiced by the state's introduction of lay medical testimony which ran afoul of Miss. R. Evid. 701 and 702. Early in the trial, Derwin Bozeman described his injuries, saying after the incident, "the nerve of [his] tongue was messed up" and the tongue "stays to one side." [T. 24].

Later the state offered the testimony of Department of Corrections Investigator

Kory Hamilton. [T. 118, *et. seq.*]. Investigator Hamilton was not tendered as an expert in any field. Over objection, Hamilton was allowed to testify as follows:

> Q. Do you know what his injury was?
> A. He sustained a two-centimeter laceration to his right side of his neck, and subsequently suffered a - - what they termed as a hypoglossal nerve injury, which - -
> [Objection to opinion testimony].
> BY THE COURT: All right. He can explain in lay terms, but to use the medical terms, we have not qualified him in any way as having a medical expertise background.
> Q. And Mr. Hamilton, if you would, if you know from your investigation in terms that you can explain to the jury what - - what was the extent of the injuries?
> A. Based upon the medical records that I acquired, he had problems swallowing, speaking - -
> [Objection to hearsay.]
> BY THE COURT: Because he's a layperson, we're not going to allow him to testify from the medical records. He can say in lay terms - -
>
> ***
>
> Well, if he can tell us in lay terms what he learned from his investigation without making a medical diagnosis and conclusions. [T. 126-27].

After the trial court's ruling, Hamilton offered the following opinion, "you could visually see that his tongue was not working. Half of it appeared to be normal and half of it didn't as if it were paralyzed, no movement." [T. 129-30].

It is the appellant's position that the trial court allowed Investigator Hamilton to cross the boundaries established by Miss. R. Evid. Rules 701 and 702 when the court said that Hamilton could describe medical injury, but just use lay terms; and, what resulted was exactly what Miss. R. Evid. Rules 701 and 702 were designed to prevent, namely, a

witness not qualified as an expert positing "expert" opinions disguised as "lay" opinions.[1] In other words, even though Inv. Hamilton was to limit his testimony to non-scientific, non-technical words, he nevertheless offered opinions as to the cause and quality of injury in this case. This testimony prejudiced James Kendrick.

In *Palmer v. Volkswagen of America, Inc.*, 905 So.2d 564, 588 (Miss. App. 2003), there was objection to a lay opinion about an air bag equipped automobile, the Court of Appeals said in reversing:

> our supreme court [has] stated that, while there is a very thin line between lay testimony and expert opinion, there is a bright line rule: "[t]hat is, where, in order to express the opinion, the witness must possess some experience or expertise beyond that of the average, randomly selected adult, it is a Rule 702 opinion and not a Rule 701 opinion" [Citation omitted.].

On *certiorari*, in *Palmer v. Volkswagen of America, Inc.* 904 So.2d 1077, 1092 (Miss. 2005), the Supreme Court concurred with the court of appeals, finding the plaintiff was prejudiced by improper opinion testimony, stating:

> To be clear, the test for expert testimony is not whether it is fact or opinion.

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[1]

**RULE 701. OPINION TESTIMONY BY LAY WITNESSES**

If the witness is not testifying as an expert, the witness's testimony in the form of opinions or inferences is limited to those opinions or inferences which are (a) rationally based on the perception of the witness,(b) helpful to the clear understanding of the testimony or the determination of a fact in issue, and (c) not based on scientific, technical, or other specialized knowledge within the scope of Rule 702.

**RULE 702. TESTIMONY BY EXPERTS**

If scientific, technical, or other specialized knowledge will assist the trier of fact to understand the evidence or to determine a fact in issue, a witness qualified as an expert by knowledge, skill, experience, training, or education, may testify thereto in the form of an opinion or otherwise, if (1) the testimony is based upon sufficient facts or data, (2) the testimony is the product of reliable principles and methods, and (3) the witness has applied the principles and methods reliably to the facts of the case.

> The test is whether it requires "scientific, technical, or other specialized knowledge" beyond that of the "randomly selected adult." If so, the testimony is expert in nature, and must be treated in discovery, and at trial, as such.
>
> This Court has held that it "will not reverse the admission or exclusion of evidence unless the error adversely affects a substantial right of a party." [cites omitted] "[F]or a case to be reversed on the admission or exclusion of evidence, it must result in prejudice and harm or adversely affect a substantial right of a party." [cites omitted]
>
> * * *
>
> The trial court abused it discretion by allowing [Volkswagen's expert] testimony to stray into the realm of scientific, technical and specialized knowledge that only could be admitted as expert testimony after assessment pursuant to Rule 702.

James Kendrick's position here is that an explanation and description of Derwin Bozeman's injuries is an area requiring expert testimony under Miss. R. Evid. Rule 702; because, a jury of lay persons would need assistance.

An average lay person would not know the general characteristics of neck wounds nor paralysis, if any. A jury would not be familiar with the basic anatomy of the neck nor the nerves, veins, arteries, and skeletal and muscle structure. Most importantly, the jury would not know whether Hamilton was describing a serious injury or not, or whether it was life threatening or permanent, nor legally and medically what caused any injury.

Not only was Hamilton's topic one for expert testimony only, it was improper for the trial court to allow lay opinion testimony because the investigator did not personally observe or examine Derwin's injury. In *Cotton v. State*, 675 So. 2d 308, 312 (Miss. 1996), the court said:

> [i]f the witness is not testifying as an expert, his testimony in the form of opinions or inferences is limited to those opinions or inferences which are (a) rationally based on the perception of the witness and (b) helpful to the clear understanding of his testimony or the determination of a fact in issue.
>
> * * *
>
> *Lay opinion testimony must meet a two prong test; the witness must have observed the fact or had first hand knowledge, and the opinion must be helpful to the determination of the issues.* Comment, M.R.E. 701.

Here, Inv. Hamilton was not testifying merely as to what he observed; he told the jury what he *concluded.* These *conclusions* were concerned a topic in which the jury needed expert help, not a communication of lay conclusions.

The case of *Goodson v. State*, 566 So. 2d 1142, 1153 (Miss. 1990) is authority for the proposition here that James Kendrick was prejudiced by the admission of Inv. Hamilton's opinions. One reason the *Goodson* court reversed was that "[t]here was a substantial probability that the jury would be mislead by [the doctor's] opinion", and letting [the doctor] testify about profiles denied Goodson the right to a fair trial Rule 103(a) MRE *Id.* at 1147-48.

Here in James Kendrick's case, the jury would have been influenced by Inv. Hamilton improper lay opinions. It would follow that James Kendrick, as Goodson, did not, therefore, receive a fair trial, and at a minimum the conviction should be reversed.

It is James Kendrick's position that this ruling from the trial court authorized not only lay opinion testimony but rank hearsay as well because Hamilton was relying on his review of medical records as the basis of his lay opinions.

Hearsay is defined as, "a statement, other than one made by the declarant while

testifying at the trial or hearing, offered in evidence to prove the truth of the matter asserted." M. R E. 801. Hearsay is inadmissible, except under certain exceptions, and when improperly admitted constitutes reversible error. *Murphy v. State*, 453 So. 2d 1290, 1294 (Miss. 1984), Miss. R. Evid. Rules 802, 803 and 804. See also *Quimby v. State*, 604 So. 2d 741, 746-47 (Miss. 1992).

In *Ratcliff v. State*, 308 So. 2d 225, 226-27 (Miss. 1975), a police officer was allowed to testify what an informant had told him during the officer's investigation. The court said, "[i]nvestigators cannot be permitted to relate to a jury hearsay which is incriminating in its effect as to a defendant on trial for a crime . . . [w]hat an informant told [the investigating officers] was hearsay and inadmissible to the jury." *Id.*

The victim in *Ratcliff* had testified identifying the defendant. Nevertheless, the *Ratcliff* court reversed and remanded the armed robbery conviction based, in part, on the circumvention of the defendant's cross-examination rights which resulted from the admission of the hearsay. *Id.*

> In *Anderson v. State*, 156 So. 645, 646-47 (Miss. 1934) it was pointed out that: [t]his court has consistently condemned the practice of undertaking to bolster up the testimony of a witness on the stand, and to strengthen his credibility by proof of his declarations to the same effect as sworn to by him out of court.

In *Anderson*, investigating officers were allowed to testify that they took the defendant to the victim who was in bed recouping from being shot and that the victim identified the defendant. The *Anderson* court reversed the conviction stating "[t]he

testimony of [the officers] under the circumstances should not have been admitted." *Id.* If the identification testimony was inadmissible and reversible error in *Ratcliff* and *Anderson*, then incompetent medical testimony from a investigator offered as proof of one of the elements of the offense is inadmissible and reversible error here. See also *Bridgeforth v. State*, 498 So.2d 796, 800 (Miss.1986), *Crawford v. Washington*, 124 S. Ct. 1354, 1356-59, 541 U.S. 36, 158 L. Ed. 2d 177 (2004), and *Clark v. State* , 891 So.2d 136, 139-41, (Miss. 2005).

This is not the kind of investigatory exception to hearsay which has been carved out to explain an investigating officers action as in *Jackson v. State*, 935 So.2d 1108, 1114 (Miss. App. 2006). In *Jackson* the testimony was offered to "to show why an officer acted as he did and where he was at a particular place at a particular time . . . [and] not introduced for the purpose of proving the truth of the assertion."

James Kendrick's not being allowed to cross-examine the medical records upon which Hamilton's opinions were based violated the U. S. Constitution 5th and 14th Amendments, and Article 3 §26 of the Mississippi Constitution of 1890. The allowance of the hearsay evidence against James Kendrick resulted in irreparable prejudice to him including the loss of cross-examination rights and bolstering of the state's case with improper hearsay and opinion testimony.

Since the element of the offense of which James Kendrick was convicted here was "proven" with improper hearsay and lay opinion testimony, it is clear that his trial was

unfair and there resulted a serious deprivation of confrontation rights and due process. The only fair remedy would be a new trial which is respectfully requested.

## ISSUE NO. 3: DID CONFLICTING JURY INSTRUCTION COMPROMISE DUE PROCESS?

This is a circumstantial evidence case which increased the state's burden of proof to that of beyond a reasonable doubt and to the exclusion of every reasonable hypothesis consistent with innocence. See *Lynch v. State*, 877 So.2d 1254, 1268(¶ 34) (Miss.2004). However, the jury instructions given conflicted as to the state's burden or proof. The trial court gave instruction CR-C-9 which stated the modified burden; however, the trial court refused to insert the proper burden into D-1 and S-1 when requested. [R. E. 18-20, R. 36, 39, 40; T.166-68 ]. The result was that the jury did not know which burden to apply, the circumstantial evidence burden of CR-C-9 or the standard burden of D-1 and S-1.

In *Scott v. State*, 446 So. 2d 580, 583 (Miss. 1984), the court said, "when a jury is given instructions which are *in hopeless conflict this court is compelled to reverse* because it cannot be said that the jury verdict was founded on correct principles of law."

In circumstantial evidence cases it is mandatory for the trial court to grant two jury instructions addressing the increased burden of proof to beyond a reasonable doubt and to the exclusion of every reasonable hypothesis consistent with innocence and the second "two-theory" when properly requested and supported by the evidence. See *Parker v.*

*State*, 606 So.2d 1132, 1140 (Miss. 1992). Failure to grant constitutes reversible error. *Id.*

In *Cooley v. State*, 346 So. 2d 912, 914 (Miss. 1977) two jury instructions concerning murder and manslaughter were hopelessly conflicting. The Court considered whether the instructions read as a whole were curative, they were not, so reversal was required. In the present case since there is no curative quality to the instructions read as a whole, it seems that *Cooley* controls here requiring a new trial. See also, *Roberts v. State*, 458 So. 2d 719, 721 (Miss. 1984).

Here it was impossible for the jury to deliberate knowing which jury instruction was correct. It was like a driver coming to an intersection with both a green and red signal. Which one light is correct? In *Woods v. State*, 965 So. 2d 725, 729 (¶11) (Miss. App. 2007) the Court found "it was impossible for the jury to follow the instructions it was given" and reversed. See also, *Johnson v. State,* 908 So. 2d 758, 764 (¶21) (Miss. 2005).

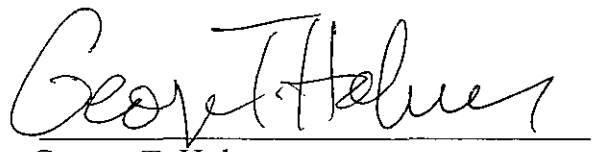
It is respectfully suggested that the learned trial judge erred in refusing to correct instructions S-1 and D-1 and James Kendrick is entitled to a new trial.

## CONCLUSION

James Kendrick is entitled to have his convictions reversed and rendered, or with remand for sentencing for simple assault or with remand for a new trial.

Respectfully submitted,

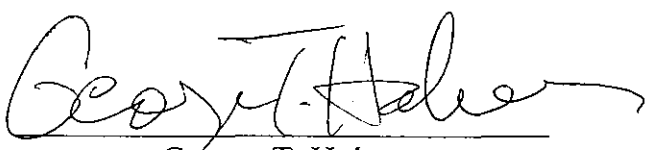
JAMES KENDRICK

By: 

George T. Holmes,
Mississippi Office of Indigent Appeals

## CERTIFICATE

I, George T. Holmes, do hereby certify that I have this the 4th day of February, 2009, mailed a true and correct copy of the above and foregoing Brief Of Appellant to Hon. Betty W. Sanders, Circuit Judge, P. O. Box 244, Greenwood MS 38935, and to Hon. W. Dewayne Richardson , Office of Dist. Atty. , P. O. Box 1046, Indianola MS 38751, and to Hon. Charles Maris, Assistant Attorney General, P. O. Box 220, Jackson MS 39205 all by U. S. Mail, first class postage prepaid.



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