

STATE OF MAINE

v.

MATTHEW C. ROBINSON

Submitted on Briefs November 25, 2024

Decided December 19, 2024

Panel: STANFILL, C.J., and, HORTON, CONNORS, LAWRENCE, and DOUGLAS, JJ.

MEMORANDUM OF DECISION

Matthew C. Robinson appeals from a judgment of conviction for criminal OUI (Class D), 29-A M.R.S. § 2411(1-A)(A) (2024), entered by the trial court (Waldo County, *R. Murray, J.*) on his conditional guilty plea. The court did not err in denying Robinson’s motion to suppress evidence obtained following a traffic stop because the officer had a reasonable, articulable suspicion that Robinson’s vehicle was towing a trailer without continuously lighted rear lights, in violation of the plain language of 29-A M.R.S. § 1905 (2024), as read in the context of its statutory scheme. *See State v. Paradis*, 2010 ME 141, ¶ 5, 10 A.3d 695; *State v. Lovell*, 2022 ME 49, ¶ 16, 281 A.3d 651; 29-A M.R.S. § 1905-B.¹ Moreover, the stop was justifiable on the additional grounds that (1) even if the officer’s interpretation of the statute was incorrect, a reasonable mistake of law does not invalidate an investigatory stop, *Heien v. North Carolina*, 574 U.S. 54, 66-67 (2014), and (2) the officer’s observation of a trailer being towed at night without lighted rear lights “generate[d] an objectively reasonable suspicion

¹ Because Robinson did not offer, at trial or on appeal, “an independent analysis of [article 1, section 5] of the Maine Constitution,” he waived his right to challenge the traffic stop under the Maine Constitution. *See State v. Norris*, 2023 ME 60, ¶ 52, 302 A.3d 1.

that . . . a threat to public safety had occurred.” *State v. Ouellette*, 2024 ME 29, ¶ 21, 314 A.3d 253; *see also State v. Pinkham*, 565 A.2d 318, 319 (Me. 1989).

The entry is:

Judgment affirmed.

Jeremy Pratt, Esq., and Ellen Simmons, Esq., Camden, for appellant Matthew C. Robinson

Natasha Irving, District Attorney, and Rachel Klotz, Stud. Atty., Prosecutorial District Six, Belfast, for appellee State of Maine