

*This opinion is nonprecedential except as provided by
Minn. R. Civ. App. P. 136.01, subd. 1(c).*

**STATE OF MINNESOTA
IN COURT OF APPEALS
A25-0097**

State of Minnesota,
Respondent,

vs.

Quenton Tyrone Williams,
Appellant.

**Filed January 12, 2026
Affirmed
Jesson, Judge***

Ramsey County District Court
File No. 62-CR-22-3816

Keith Ellison, Attorney General, St. Paul, Minnesota; and

Irene Kao, St. Paul City Attorney, Jack Billion, Assistant City Attorney, St. Paul, Minnesota (for respondent)

Cathryn Middlebrook, Chief Appellate Public Defender, Michael McLaughlin, Assistant Public Defender, St. Paul, Minnesota (for appellant)

Considered and decided by Worke, Presiding Judge; Cochran, Judge; and Jesson, Judge.

* Retired judge of the Minnesota Court of Appeals, serving by appointment pursuant to Minn. Const. art. VI, § 10.

NONPRECEDENTIAL OPINION

JESSON, Judge

Appellant Quenton Tyrone Williams challenges his misdemeanor convictions of giving a false name to a peace officer, fleeing a peace officer, and fifth-degree assault, raising issues that highlight the tension between the constitutional rights to a speedy trial and to not be tried while incompetent, as well as the rights to counsel and self-representation. He argues that (1) the 29-month delay in bringing the charges to trial violated his right to a speedy trial, (2) the district court failed to follow applicable procedures during the year-long process that led to him being found competent to proceed to trial, and (3) the district court abused its discretion by refusing to reappoint counsel and trying him in absentia. In a pro se supplemental brief, he advances additional arguments regarding judicial bias, jury instructions, and exclusion of a witness. Because Williams has not substantiated any of the errors he asserts, we affirm.

FACTS

On July 8, 2022, following an incident at a grocery store, appellant Quenton Tyrone Williams was charged by citation with three misdemeanors: giving a false name to a peace officer, fleeing a peace officer, and fifth-degree assault. Following arraignment in October and a pretrial hearing in November, trial was set for March 2023. It was later rescheduled to May because of a pending examination to determine whether Williams was competent to stand trial on unrelated Dakota County charges, meaning that he had the ability to consult rationally with counsel and understood the proceedings against him. *See Bonga v. State*, 797 N.W.2d 712, 718 (Minn. 2011).

The Dakota County examination report was submitted at the end of May. It noted that Williams refused to participate in a structured examination for competence but opined, based on an interview with him and collateral information, that he was competent. The Ramsey County District Court here ordered the Dakota County report filed into this matter on June 13 and set a hearing for the following day.

Competency Proceedings

At the June 14 hearing, defense counsel voiced concerns about the Dakota County report and asked the district court to order a new competency examination in this matter. The court denied the request, saying it would “treat the evaluation completed in that other county as our first evaluation” and noting that the defense could object to it. Defense counsel said she would obtain an independent examination and thereafter filed a written objection to the Dakota County competency report.

At review hearings in July and October, defense counsel reported that she had not yet obtained an independent examination but declined to provide further explanation, citing attorney-client privilege. In the meantime, another Ramsey County judge ordered a competency examination in a new case. The judge in this case vacated the order, over defense objection, because “we’re in the middle of determinations of competency.” A hearing in this matter—involving the June 2022 grocery store incident—was set for January 31, 2024.

By that hearing, Williams still had not participated in an independent examination. Defense counsel instead requested to proceed to a contested competency hearing without one, suggesting “a couple of months out.” A hearing was set for March 25 but did not take

place because, according to the district court's later summary, another competency examination was completed in February in another (again unspecified) county and "nobody liked" the report.

Instead, on March 1, the district court ordered a competency examination in this matter. Two months later, the court-appointed examiner reported she had been unable to contact Williams to conduct an examination, despite repeated efforts, and said that she would need to be reappointed to allow additional time to examine him. The district court reissued its order for a competency examination. The examiner submitted a report on June 10, opining that Williams was competent to proceed. The district court adopted the opinion without objection and found Williams competent. Progress toward trial resumed.

Pretrial Proceedings

A pretrial hearing was set for July 8. Before that hearing, Williams was assigned new counsel and asked for a continuance to allow them time to meet. The district court granted the request and set a new pretrial hearing date of August 20. At that hearing, Williams appeared with counsel and demanded a speedy trial, and the court set a trial-management conference for October 3, to be followed by a jury trial starting October 14.

At the October 3 hearing, Williams asked to discharge his attorney. The district court denied the request, noting that Williams seemed frustrated with the court, not counsel, but provided him a petition to proceed pro se.

At the next hearing, on October 14, the district court reminded Williams that it had provided him the petition and asked if he still wanted to discharge his attorney. He said he did not. Defense counsel then noted that because of the uncertainty regarding a possible

waiver of counsel she was delayed in filing “certain things” and, at the court’s request, agreed to file them that day. Counsel filed a motion to dismiss “for violation of right to speedy trial due to ineffective assistance of counsel,” asserting that Williams’s first attorney “made a frivolous request” for a competency evaluation, which caused “unreasonable delay that violated [his] right to a speedy trial.” Counsel also noted that, because of the nature of the motion, the public defender’s office would need to appoint a conflict attorney, which would necessitate a continuance.

The district court found “good cause to continue this matter” to resolve the motion with “a conflicts lawyer.” The district court heard the motion on November 7 and denied it that day, explaining that the fact that Williams was found competent did not make defense counsel’s request for a competency examination frivolous or otherwise indicative of ineffective assistance of counsel because that is the result of most competency examinations. Rule 20.01, the court explained, serves “as a check to make sure an incompetent defendant does not go to trial.” The court set trial for the following month.

Trial

When Williams appeared for trial on December 16, he submitted an executed petition to proceed pro se and told the court he wanted to represent himself. The district court started questioning Williams about his waiver of counsel but paused and recalled the matter twice because of his uncooperative behavior, including shouting when asked to speak up and interrupting the judge. In its third effort, the district court spoke with Williams extensively (spanning more than 60 transcript pages) about his decision to waive counsel. During that exchange, Williams repeatedly focused on the competency

proceedings and said he was being forced to proceed pro se. Ultimately, though, Williams said he was voluntarily waiving counsel and agreed that he understood that “once [the court] discharge[d] the Public Defender’s Office, they [would] not be reappointed to represent [him].” The district court found that he had “freely, voluntarily, and knowingly” waived counsel and accepted his petition to proceed pro se. The court appointed standby counsel, to which Williams agreed, also acknowledging that he understood her “role is limited.”

As the court then discussed evidentiary matters with Williams and the prosecutor, Williams began requesting an examination for a mental-illness defense under Minn. R. Crim. P. 20.02, which the district court denied, finding that he was merely trying to delay trial. The court noted that Williams could still argue to the jury regarding his mindset at the time of the alleged offenses.

The next day, the court noted that jury selection would happen that afternoon and resumed discussion of evidentiary matters. Williams asserted that he was “not up to par to represent [himself] appropriately right now” because he had not received enough to eat and refused to change into street clothes because he had not been able to shower and shave. He also renewed his request for a rule 20.02 examination, which the district court again denied, with additional explanation. Discussion of motions in limine followed, during which Williams repeatedly interrupted the court and refused to respond to questions. The court admonished him for “disrupting this trial from going on” and advised him that it would give him three warnings and would “remove [him] from this trial” if his “disruptive” behavior continued.

Williams then asked for a copy of the most recent rule 20.01 report, and the court instructed him to stop talking about rules 20.01 and 20.02, and if he did not the court would “deem it a disruption to this trial.” At this point, Williams requested that standby counsel “step in for [him]” and “take over the case.” The district court denied the request. Williams also asked the court to “give [him] a Public Defender,” which the court denied.

Williams resumed complaining of his mental state, but the district court found him “alert” and exhibiting no indication of incompetence but rather knew “very well what he’s doing, which is to stall jury selection.” When Williams’s commentary about competency continued after a “final warning,” the court had him removed from the courtroom. It completed motions in limine in his absence, then had Williams returned to the courtroom. Williams continued to interrupt and reference rule 20, and the court had him removed again. The court offered Williams another chance to return to court before starting jury selection; he declined. Standby counsel participated in jury selection but confirmed that she would thereafter resume a “back seat” role.

When testimony began the following day, December 18, Williams refused transport from jail. The trial proceeded without him. The jury found Williams guilty on all three counts, and the court sentenced him to time served.

Williams appeals.

DECISION

The United States and Minnesota Constitutions afford every criminal defendant a host of rights, which sometimes conflict with each other. Defendants have the right to a speedy trial. U.S. Const. amend. VI; Minn. Const. art. I, § 6. But they also have a right not to be tried while legally incompetent, and a district court must “observe procedures adequate to protect [this] right,” including suspending proceedings—thereby delaying trial—if there is reason to doubt a defendant’s competency. *Bonga*, 797 N.W.2d at 718 (quoting *Drope v. Missouri*, 420 U.S. 162, 171 (1975)). Similarly, defendants have the right to assistance of counsel, but they also have the “corollary” right to represent themselves, which can create a “dilemma” for courts, particularly if a defendant waives their right—also constitutionally protected—to be present for trial. *State v. Worthy*, 583 N.W.2d 270, 277, 279 (Minn. 1998); see *Ford v. State*, 690 N.W.2d 706, 712 (Minn. 2005) (discussing defendant’s constitutional right to be present at trial). This case lies at the crossroads of these rights.

I. Williams’s right to a speedy trial was not violated.

We review de novo whether a defendant’s speedy trial right was violated. *State v. Jones*, 977 N.W.2d 177, 190 (Minn. 2022). In doing so, we consider four nonexclusive factors: (1) the length of the delay, (2) the reason for the delay, (3) the defendant’s assertion of the right to a speedy trial, and (4) the prejudice to the defendant as a consequence of the delay. *State v. Zielinski*, 10 N.W.3d 1, 17 (Minn. 2024) (citing *Barker v. Wingo*, 407 U.S. 514, 530 (1972)). We view the factors together, along with any other relevant circumstances, in a “difficult and sensitive balancing process” in which no

single factor is necessary or sufficient to a conclusion that the defendant was deprived of the right to a speedy trial. *State v. Mikell*, 960 N.W.2d 230, 245 (Minn. 2021) (quotation omitted).

Length of the Delay

The length of delay is measured from the point at which the speedy trial right attaches—the date of charging or arrest, whichever comes first. *State v. Osorio*, 891 N.W.2d 620, 627 (Minn. 2017). A delay of six months after that point is “presumptively prejudicial.” *Id.* at 628. A delay of more than 60 days after the defendant demands a speedy trial also establishes presumptive prejudice. *Mikell*, 960 N.W.2d at 246; *see also* Minn. R. Crim. P. 11.09(b) (requiring district court to begin trial within 60 days after speedy trial demand “unless the court finds good cause for a later trial date”). Williams emphasizes that more than 29 months passed between charging in July 2022 and trial in December 2024, and the state concedes that “a great deal of time” passed before Williams’s trial. We agree. But even presumptively prejudicial delay is not dispositive; it merely “trigger[s] an inquiry into the remaining *Barker* factors.” *Osorio*, 891 N.W.2d at 628.

Reason for the Delay

We also consider whether the state (the prosecution and the courts) or the defendant is responsible for the delay. *Mikell*, 960 N.W.2d at 250-51. “When the overall delay in bringing a case to trial is the result of the defendant’s actions, there is no speedy trial violation.” *Id.* (quotation omitted). Delay is attributed to the defendant when it results from defense motions, including a motion for a competency evaluation. *State v. DeRosier*, 695 N.W.2d 97, 109 (Minn. 2005).

The bulk of the delay in bringing this matter to trial is undisputedly because of the competency process that stretched from June 2023 to June 2024. Williams faults the district court for this delay, asserting that the court mismanaged the process. We disagree. More than eight months of proceedings sprung from defense counsel’s requests—first for an independent examination, then for a contested competency hearing. These requests are reasonably attributable to Williams. *Id.* Then the district court ordered a competency examination in March 2024, which did not occur until three months later because Williams would not make himself available to the examiner. In short, the entire competency-related delay is attributable to Williams.

Once that process ended, there was a brief delay for Williams’s new counsel to prepare, which we consider neutral because Williams did not request the substitution. But then further defense delays followed, pushing trial from October 2024 to December 2024—Williams’s request to dismiss defense counsel, then a defense motion to dismiss that counsel was delayed in filing because of Williams’s interest in dismissing her, followed by a brief delay to appoint conflict counsel, then a hearing on the motion where the court promptly denied it, permitting progress toward trial to resume. Because the record reflects extensive delay attributable to Williams, and he cannot point to any delays caused by the state, this factor weighs heavily against him.

Assertion of the Right

An assertion of the speedy trial right is determined based on the circumstances. *State v. Windish*, 590 N.W.2d 311, 317 (Minn. 1999). The question is not whether the defendant made a “formal or technical” demand for a speedy trial but merely whether they

took “any action whatsoever that could be construed as the assertion of the speedy trial right.” *Id.* (quotation omitted). But the relevant circumstances also include any conduct by the defendant after demanding a speedy trial that suggests the defendant’s demand was not “serious.” *Mikell*, 960 N.W.2d at 252. “[S]uch an assessment focuses on whether the speedy-trial demands are accompanied by actions that undermine the ability for the trial to occur.” *State v. Paige*, 977 N.W.2d 829, 841 (Minn. 2022).

Williams says that he demanded a speedy trial on November 15, 2022, while the state insists that he did not do so until August 20, 2024. We agree with Williams. At the earlier hearing, Williams said that he had “asked for a speedy trial before . . . coming in here” and “always ask[s] for a speedy trial.”

While these comments are not a formal invocation of his speedy trial right, it is hard to construe them as anything other than a request for a speedy trial. But Williams followed his assertion of the right by refusing to cooperate with the competency process. And while he reasserted his speedy trial right after being found competent, he prioritized other matters—in particular, moving to dismiss based on a claim that the competency process violated his speedy trial right, rather than simply proceeding expeditiously to trial. *See Mikell*, 960 N.W.2d at 253 (distinguishing between moving to dismiss based on claimed speedy trial violation and requesting a speedy trial). Overall, this factor weighs somewhat, but not overwhelmingly, in favor of Williams.

Prejudice

We consider three interests in determining whether a defendant suffered prejudice: “(1) preventing oppressive pretrial incarceration; (2) minimizing the anxiety and concern

of the accused; and (3) preventing the possibility that the defense will be impaired.” *State v. Taylor*, 869 N.W.2d 1, 20 (Minn. 2015) (quotation omitted). Williams does not claim any impairment of his defense but contends he was prejudiced by the delay in bringing this matter to trial because he was subjected to more than 300 days of pretrial incarceration. But the interest in preventing “oppressive pretrial incarceration” is “not implicated” if the defendant is “already in custody for another offense.” *Id.* Our careful review of the record confirms that Williams spent significant time in custody during the pendency of these charges but all of it because of other offenses. Williams faced numerous other charges, including gross misdemeanors and felonies, in Ramsey County and elsewhere throughout the pendency of this matter, and he was often in custody because of those other charges.¹ However, Williams does not identify, and our careful review has not revealed, anything in the record that indicates Williams was ever in custody for the misdemeanor charges in this matter. Williams’s complaint of anxiety and concern over the delay is similarly unsubstantiated because he cites merely generalized “frustration and concern over the trial delay.” On this record, the prejudice factor does not suggest a speedy trial violation.

Balancing

The delay of more than 29 months in bringing this matter to trial undisputedly raises a presumption of prejudice, but the other factors do not favor Williams’s speedy trial claim.

¹ The competency proceedings at issue here also pertained to those other charges, and the examination report in June 2024 was for this and seven other Ramsey County cases.

Defense motions contributed to most of the delay and also cast some doubt on the seriousness of Williams’s assertion of his speedy trial right, and the record does not indicate any prejudice to Williams. Accordingly, Williams’s speedy trial claim fails.

II. Williams is not entitled to relief based on the district court’s management of the competency proceedings.

Williams contends the district court committed “pervasive errors” in the competency proceedings by failing to comply with Minnesota Rule of Criminal Procedure 20.01 (2022).² He first claims error in the district court’s adoption of the Dakota County competency report, arguing it was improper because no statute or rule authorizes it to do so. We are not persuaded. While rule 20.01 does not expressly permit a district court to adopt a competency report from another county, nor does it prohibit a court from doing so. Moreover, the rule contemplates information sharing. *See* Minn. R. Crim. P. 20.01, subd. 4(a) (“Any examiner may obtain and review the report of any prior examination under this rule.”). And courts are charged with “maintaining an efficient and effective judicial system.” *State v. Courtney*, 696 N.W.2d 73, 82 (Minn. 2005). We discern no error in the district court’s efficient use of the Dakota County report here.

² Williams discusses the requirements of Minn. Stat. §§ 611.40-.59 (2024) and the current version of Minnesota Rule of Criminal Procedure 20.01. But neither those statutes nor the current version of rule 20.01 were in effect during the competency proceedings in this matter. 2023 Minn. Laws, ch. 52, art. 1, § 14 (providing that new competency statutes are effective April 1, 2024, and “apply to competency determinations initiated on or after that date”); *Order Promulgating Amendments to the Minn. Rules of Criminal Procedure*, No. ADM10-8049 (Minn. Sept. 20, 2024) (providing that amendments to rule 20.01 to account for the new competency statutes are effective November 1, 2024). Accordingly, we limit our analysis to the applicable version of rule 20.01.

Williams also contends the court “unjustifiably suspended” proceedings based on the Dakota County competency report and “mishandled” the defense request for an independent examination. This contention is also unavailing. A district court that finds reason to doubt a defendant’s competency must “suspend the criminal proceedings,” order a competency examination (unless dismissal is warranted), and set a hearing for “no later than 60 days from the date of the court’s order.” Minn. R. Crim. P. 20.01, subd. 3. But between June 2023 and March 2024, the district court never found reason to doubt Williams’s competency and never issued an order or made a statement on the record that it was suspending the proceeding. Rather, the court granted *defense* requests for time to obtain an independent competency evaluation. And while rule 20.01 requires a party objecting to a competency report to do so within 10 days, it does not establish a time limit for obtaining an independent examination or preclude a court from granting continuances to accommodate that process. *See* Minn. R. Crim. P. 20.01, subd. 5.

Williams also faults the district court’s March 2024 order for a competency evaluation as stating insufficient basis for doubting his competency. He is correct that the order itself is somewhat vague, citing only “the record, including the motion(s) and representations of counsel, as well as the Court’s observations of the defendant.” But he does not identify any authority requiring the district court’s order to say more than that. Also, the record does, in fact, supply reason to doubt Williams’s competency in the form of (1) consistent and undisputed recognition that multiple other courts had issued orders questioning Williams’s competency; and (2) defense counsel’s objection, sustained over

more than eight months, to the district court's acceptance of the Dakota County evaluation finding him competent.

In sum, Williams has not demonstrated that the district court committed any errors in its management of the competency proceedings.

III. The district court did not abuse its discretion by refusing to reappoint counsel and trying Williams in absentia.

Williams contends the district court erred by denying his request to have counsel reappointed and trying him in absentia, emphasizing the constitutional rights to have the assistance of counsel and to be present for trial. *See United States v. Cronin*, 466 U.S. 648, 654 (1984) (counsel); *Ford*, 690 N.W.2d at 712 (presence); *see also* Minn. R. Crim. P. 26.03, subd. 1(1) (presence). But, as he also acknowledges, both of these rights can be waived. Minn. R. Crim. P. 26.03, subd. 1(2) (presence); *State v. Finnegan*, 784 N.W.2d 243, 247 (Minn. 2010) (presence); *Worthy*, 583 N.W.2d at 275 (counsel). And both of the decisions he challenges are discretionary ones. We address each in turn.

Reappointment of Counsel

A defendant who waives counsel “does not have an absolute right to relinquish the right of self-representation.” *State v. Clark*, 722 N.W.2d 460, 469 (Minn. 2006). They may do so only if the request is “timely, reasonable, and reflects extraordinary circumstances.” *Id.* The district court has discretion whether to grant the request and, in exercising that discretion, should balance “the request against the progress of the trial to date, the readiness of standby counsel to proceed, and the possible disruption of the proceedings.” *Id.* (quotation omitted).

Here, Williams claims error in the district court's refusal to reappoint counsel. The record shows otherwise. Williams asked to relinquish self-representation the day after he waived counsel and in the midst of final trial preparations, as the court was addressing motions in limine and attempting to proceed with jury selection. The district court also repeatedly rejected Williams's claim that he could not represent himself because he was lacking "energy" and "mental stability," finding that he was "fully engaged" and "alert" and merely intended to delay trial. And as Williams acknowledges, reappointment of counsel, whether through standby counsel or a public defender, would have necessitated a continuance. Given the age of the case (which Williams himself emphasizes) and the numerous hurdles already overcome to bring the case to the eve of trial, as well as the district court's express findings regarding Williams's mental state, we discern no abuse of discretion in the district court's denial of Williams's request to reappoint counsel.

Trial in Absentia

Notwithstanding the defendant's right to be present during trial, a district court may conduct trial in their absence if (1) the defendant is "absent without justification after the trial starts"; or (2) the defendant "after warning, engages in conduct that justifies expulsion from the courtroom because it disrupts the trial or hearing." Minn. R. Crim. P. 26.03, subd. 1(2). If a court excludes a defendant for disruptive behavior, it need not "continually" invite them back or otherwise seek to determine if they are "ready to behave." *State v. Gillam*, 629 N.W.2d 440, 452 (Minn. 2001). Rather, "the defendant has the burden to inform the court" when they are ready to return and "conform [their] conduct to the requirements of the court." *Id.* We review the "decision to conduct a trial in absentia under

an abuse of discretion standard and will not disturb the [district] court's factual findings unless they are clearly erroneous." *Id.* at 450.

Williams advances several arguments challenging the district court's decision to remove him and conduct trial without him. First, he argues that his conduct was not disruptive because it was "primarily" focused on requesting a rule 20.02 examination and such a focus was appropriate because the district court improperly conflated rules 20.01 and 20.02 in denying the request. This argument is unavailing. The behavior the district court found disruptive was not only—or even primarily—requests for a rule 20.02 examination. Rather, as the district court noted, various aspects of Williams's behavior were disruptive, including repeatedly interrupting the court, refusing to answer questions, and referencing rule 20.01. Also, even if he were correct about the merits of the district court's reasoning in denying his request for a rule 20.02 examination, he identifies no authority for the proposition that it is appropriate, rather than disruptive, to repeat such requests in the face of multiple express rulings and multiple warnings to desist.

Williams also seeks to minimize his disruptive behavior by noting that it did not occur in the jury's presence. But a defendant may be removed for disruptive behavior even before a jury is sworn if trial is scheduled to begin and prospective jurors are waiting for jury selection. *Carse v. State*, 778 N.W.2d 361, 369 (Minn. App. 2010), *rev. denied* (Minn. Apr. 20, 2010). That was the circumstance here.

Finally, Williams emphasizes that removing him from the courtroom left nobody to advocate for him and counter the state's case. He contends doing so "in tandem" with denying his request to reappoint counsel "led to a fundamentally unfair process." But

Williams largely ignores that the lack of an adversarial element during the state's presentation of evidence was due to his refusal to come to court, not the district court excluding him. Williams seems to assert that his absence was involuntary, but he has the burden to prove as much. *State v. Finnegan*, 784 N.W.2d 243, 247 (Minn. 2010). He has not done so. He says only that the record is "complicated," and does not address either instance in the record when the district court invited Williams to return to court and he expressly refused. Additionally, the supreme court has determined that a defendant may waive the right to be present even if they have also waived counsel, leaving nobody in the courtroom actively representing their interests. *Worthy*, 583 N.W.2d at 277, 279.

On this record, the district court did not abuse its discretion by conducting Williams's trial in his absence.

IV. Williams is not entitled to relief based on his pro se arguments.

In a pro se supplemental brief, Williams asserts claims of judicial bias, error in jury instructions, and error in the exclusion of a witness. We address each in turn.

Judicial Bias

On the first scheduled day of trial, in the midst of discussing his counsel waiver, Williams asserted that the presiding judge was biased and asked her to remove herself. He cited a pretrial hearing in August 2024 at which the judge had presided and asked the parties whether they had resolved the case, asserting that encouraging them toward a resolution "prejudged the case." The district court denied the request, explaining that it is common to inquire about case resolution, in part to ensure defendants are aware of and consider their options. Williams reiterated his claim of judicial bias the next day, citing "the same

reason.” Later that day, the chief judge questioned Williams about his bias claim, to which he added that the presiding judge had removed him from the courtroom and “belittled” him and been “sarcastic” toward him. The chief judge denied the claim, noting that adverse rulings are not grounds to remove a judge for bias and finding that the judge could “preside over this trial, that she can do so judiciously, impartially, and respectfully.”

Williams challenges the denial of his disqualification motion. We review the denial of a motion to disqualify a judge for an abuse of discretion. *Rossberg v. State*, 874 N.W.2d 786, 789 (Minn. 2016). “Judicial bias is a basis for disqualification,” but a party’s “subjective belief that the judge is biased does not necessarily require disqualification.” *Id.* To demonstrate bias, Williams reiterates his concerns about the presiding judge’s earlier inquiry about a resolution. But he cites no authority precluding a judge from asking about case resolution, and the rules contemplate such an inquiry. *See* Minn. R. Crim. P. 11.05 (“The Omnibus Hearing may also include a pretrial conference to determine whether the case can be resolved before trial.”). He also complains of unspecified “misconduct” during trial, which seems to be a repetition of his complaint about adverse rulings. But “adverse rulings by themselves do not demonstrate judicial bias.” *Hannon v. State*, 752 N.W.2d 518, 522 (Minn. 2008). On this record, Williams has not shown an abuse of discretion in denying his motion to disqualify the presiding judge for judicial bias.

Jury Instructions

Williams also argues that the district court erred in its jury instructions on fifth-degree assault. Where, as here, there was no objection to the instruction at trial, we review for plain error. *State v. Collins*, 24 N.W.3d 693, 704 (Minn. App. 2025), *rev. denied* (Minn.

Sept. 17, 2025). Under that standard, we will reverse only if (1) an error occurred, (2) it is “plain” or “obvious,” (3) it affected substantial rights, and (4) it “seriously affects the fairness, integrity, or public reputation of judicial proceedings.” *Id.* at 704-05.

Williams contends the district court erred in instructing the jury on the elements of fifth-degree assault because it said only that the offense entails intentional infliction of bodily harm, omitting an instruction about an attempt to inflict bodily harm. He notes that the pattern jury instructions contemplate a possible instruction on attempt, 10 *Minnesota Practice*, CRIMJIG 8.17 (2022), and that the jury asked a question about the instruction: “Does bodily harm have to occur or is it just the intent to cause bodily harm?” But the state charged Williams with an actual assault—striking a person in the face—not an attempt, so instructing the jury on attempt likely would have been more confusing than helpful. *See Collins*, 24 N.W.3d at 706 (stating that when the charge was assault, rather than attempted assault, failing to define “assault” as part of instructions “might have confused rather than guided the jury”). We discern no error in declining to give such an instruction. Moreover, the jury’s guilty verdict reflects its determination that the state proved that Williams did not merely attempt but actually inflicted bodily harm, so any error in omitting the instruction did not affect his substantial rights.

Exclusion of Defense Witness

Williams also contends the district court erred by “not allowing” a witness he wanted to call. We review a district court’s evidentiary rulings for an abuse of discretion. *State v. Maye*, 6 N.W.3d 103, 108 (Minn. 2024). The district court excluded D.M.’s proposed testimony because he was undisputedly not present at the time of the alleged

offenses and, therefore, lacked personal knowledge of the events in question. Because witnesses may only testify to matters within their personal knowledge, Minn. R. Evid. 602, the district court did not abuse its discretion by excluding the witness.

Affirmed.