

*This opinion is nonprecedential except as provided by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
A25-1812**

Cameron Oneal Clark, petitioner,
Appellant,

vs.

State of Minnesota,
Respondent.

**Filed June 29, 2026
Affirmed
Larson, Judge**

Hennepin County District Court
File No. 27-CR-21-8343

Cameron O’Neal Clark, Rush City, Minnesota (self-represented appellant)

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

Mary F. Moriarty, Hennepin County Attorney, Matthew D. Hough, Assistant County Attorney, Minneapolis, Minnesota (for respondent)

Considered and decided by Larson, Presiding Judge; Wheelock, Judge; and Bond,
Judge.

NONPRECEDENTIAL OPINION

LARSON, Judge

Self-represented appellant Cameron O’Neal Clark¹ filed a petition for postconviction relief based on witness recantation. Following an evidentiary hearing, the district court denied the petition, and Clark appeals. Because we conclude the district court did not abuse its discretion when it denied Clark’s postconviction petition, we affirm.

FACTS

Following a jury trial in 2021, Clark was convicted of first-degree attempted murder of an unborn child and first-degree aggravated robbery. A.H. and Clark were in a relationship, and A.H. was pregnant.² A.H. visited Clark at an apartment complex when Clark and another individual attacked her. Clark kicked A.H. all over her body and tased her on the stomach and back. A.H. identified Clark as one of the assailants and testified that Clark knew she was pregnant at the time of the attack. Clark filed a direct appeal challenging his convictions, and we affirmed. *State v. Clark*, No. A22-0009 (Minn. App. Dec. 12, 2022), *rev. denied* (Minn. Mar. 14, 2023).

In July 2024, Clark filed a petition for postconviction relief, arguing he was entitled to a new trial because A.H. had recanted. A.H. submitted an affidavit in support of Clark’s

¹ The district court case caption identifies appellant as “Cameron Oneal Clark.” Appellant identifies himself as “Cameron O’Neal Clark” in his brief. The caption of this opinion conforms to the caption used in the district court. *See* Minn. R. Civ. App. P. 143.01. But we use appellant’s preferred name in the body of the opinion.

² It is unclear whether Clark and A.H. were still in a relationship when Clark sought postconviction relief. A.H. testified at the evidentiary hearing before the district court. When asked whether she and Clark were “still romantically involved,” A.H. stated that she “prefer[red] not to answer that question.”

petition acknowledging that she named Clark “as [her] assailant” but now “wish[ed] to recant.” In the affidavit, A.H. explained that she was in an emotional state after the attack due to her pregnancy and separation from Clark, which affected her clarity at the time she accused Clark. The state opposed Clark’s postconviction petition.

The district court granted Clark’s request for an evidentiary hearing at which Clark had legal representation. There, A.H. testified that she was “unsure” whether Clark attacked her. She stated that “in the moment,” she “believed it was him,” but now she doubted her identification after having “time to think over the situation.” The state questioned A.H. about an order for protection (OFP) she sought against Clark following the assault and jail calls made between her and Clark in December 2024. In addition to A.H.’s testimony, the district court received: police reports; A.H.’s affidavit and petition for an OFP following the assault; a child-support order involving Clark and A.H.’s shared child; a transcript of A.H.’s trial testimony; and call logs, recordings, and transcripts of three jail calls between Clark and A.H. in December 2024.

Following the evidentiary hearing, the district court denied Clark’s postconviction petition, finding A.H.’s hearing testimony “wholly incredible” and her affidavit recantation “not genuine.” Thus, based upon the evidence, the district court determined it had “no reason to believe that A.H.’s trial testimony was false.”

Clark appeals.

DECISION

Clark challenges the district court’s decision to deny his postconviction petition. We review a district court’s decision to deny a postconviction petition for an abuse of

discretion. *Williams v. State*, 5 N.W.3d 399, 405 (Minn. 2024). A district court abuses its discretion when it has “exercised its discretion in an arbitrary or capricious manner, based its ruling on an erroneous view of the law, or made clearly erroneous factual findings.” *Pearson v. State*, 891 N.W.2d 590, 596 (Minn. 2017) (quotation omitted).

Clark argues the district court abused its discretion when it determined that his witness-recantation claim did not entitle him to relief. When a petitioner raises a witness-recantation claim, Minnesota courts apply the three-prong *Larrison* test.³ *See Andersen v. State*, 940 N.W.2d 172, 178 (Minn. 2020). To satisfy the *Larrison* test, a petitioner must establish the following by a preponderance of the evidence: “(1) the court must be reasonably well-satisfied that the testimony in question was false; (2) without that testimony the jury might have reached a different conclusion; and (3) the petitioner was taken by surprise at trial or did not know of the falsity until after trial.” *Id.* The first two prongs are mandatory, but the third prong is not required for relief. *Kaiser v. State*, 4 N.W.3d 95, 103 (Minn. 2024).

Here, the district court determined that Clark did not meet his burden to establish the first *Larrison* prong. A petitioner meets their burden on the first *Larrison* prong when the district court is “reasonably certain that the recantation is genuine.” *State v. Walker*, 358 N.W.2d 660, 661 (Minn. 1984). The district court can consider the circumstances surrounding a recantation when evaluating the first *Larrison* prong. *See id.* Clark argues

³ Although *Larrison* was overruled, *see Larrison v. United States*, 24 F.2d 82, 87-88 (7th Cir. 1928), *overruled by United States v. Mitrione*, 357 F.3d 712, 718 (7th Cir. 2004), Minnesota courts continue to apply the *Larrison* test to witness-recantation claims. *See State v. Duol*, 25 N.W.3d 135, 139 n.4 (Minn. 2025).

the district court abused its discretion in its analysis of the first *Larrison* prong, raising two arguments.

First, Clark asserts the district court's decision conflicts with the supreme court's decisions in *State v. Al-Naseer*, 788 N.W.2d 469 (Minn. 2010), and *State v. Caldwell*, 322 N.W.2d 574 (Minn. 1982). But the supreme court did not evaluate a witness-recantation claim or apply the *Larrison* test in *Al-Naseer*. 788 N.W.2d at 473-81. And *Caldwell* is distinguishable because the supreme court applied the *Larrison* test to evaluate a false-testimony claim, not a witness-recantation claim. 322 N.W.2d at 587. Because neither case applies the *Larrison* test in the witness-recantation context, we are not persuaded that either case supports Clark's claim that the district court abused its discretion.

Second, Clark contends the district court abused its discretion because its decision was contrary to the evidence presented at the evidentiary hearing. Specifically, Clark argues the record "presents nothing to infer [A.H.] was induced by [Clark] to recant her trial testimony." We disagree. The state admitted three jail calls wherein Clark discussed recanted testimony and the postconviction process with A.H. Then, at the evidentiary hearing, A.H. claimed that she could not recall whether these conversations occurred. *See State v. Hill*, 253 N.W.2d 378, 384 (Minn. 1977) ("Courts have traditionally looked with disfavor on motions for a new trial founded on alleged recantations . . .").

Moreover, the district court's explanation for why it was not "reasonably certain that the recantation [was] genuine" is well supported by the record. *See Walker*, 358 N.W.2d at 661. As the district court observed, A.H.'s recantation was a noticeable

departure from her trial testimony. And the state presented corroborating evidence at trial to support A.H.'s trial testimony.

For these reasons, we conclude the district court did not abuse its discretion when it denied Clark's postconviction petition.

Affirmed.