

## ***Clark v. Arizona (2006)***

**Nature:** Introducing evidence regarding mens rea.

**Facts:** Eric Clark, suffering from Paranoid Schizophrenia, held a delusional belief that aliens had invaded his town and wanted to kill him. He shot and killed a police officer while apparently acting on these beliefs and was charged with first-degree murder. He was initially found incompetent to stand trial and required two years of competency restoration before proceeding with a bench trial. He did not contest that he shot and killed the police officer but argued that symptoms of Schizophrenia prevented him from “intentionally or knowingly” killing the officer (i.e., mens rea). The defense additionally attempted to present evidence that he met the state’s definition of insanity as, due to his mental illness, he did not know the wrongfulness of his actions (i.e., insanity defense). The court heard testimony on the insanity defense issue that Clark had rigged his room with fishing line and chimes to alert him to intruders and had kept a bird in his car to detect airborne pathogens. Psychiatrists for the prosecution and defense agreed that Clark suffered from a mental illness, but were divided on if Clark was able to distinguish the wrongfulness of shooting the police officer at the time. The court ultimately ruled that the evidence did not meet the burden of proof for the insanity defense. On the issue of mitigating mens rea, the court refused to allow evidence to negate specific intent, holding that Arizona only allows such evidence to be presented in the insanity defense. The judge then found Clark guilty of murder in the first-degree and issued a sentence of 25 years to life in prison. Clark appealed on the grounds that the statutory definition of insanity was so narrow that it violated his right to Due Process under the Fourteenth Amendment. The court of appeals affirmed the trial court’s decision and the Arizona Supreme Court denied review.

**Issues:** 1. Does Arizona’s insanity statutes violate Fourteenth Amendment rights to due process?  
2. Does Arizona’s exclusion of evidence to consider a mental disease or defect to refute mens rea violate the Fourteenth Amendment rights to due process?

**Holding and Rationale:** 1. No. Though Clark argued that the two-prong approach offered in the original M’Naghten Case rose to the level of a “fundamental principal” in the legal system, the USSC opined that the historical and current amount of variation of the adoption of insanity statutes between states was proof to negate Clark’s argument. The USSC opined that states may

limit the elements of the insanity defense so long as the issue of mens rea is introducible at some point during the trial process. The USSC opined that Arizona's law did not violate the Fourteenth Amendment as it had a bifurcated process in which to introduce the insanity defense. In Clark's case, the USSC upheld the trial court's decision as they heard testimony regarding his mental state at the time of the crime and ruled that he knew right from wrong so he did not qualify for the insanity defense under Arizona's statutes. 2. No. Expert testimony in certain circumstances may be excluded if it has the potential to confuse or mislead the jury. Arizona does not allow mental health evidence to show that the defendant did not possess the required mental intent level necessary to satisfy an element of the crime and the evidence is only admissible to show that the defendant was insane at the time of the crime. Implications: The insanity standard is "open to state choice" and as long as there is an opportunity at some point in the trial to present evidence regarding mental state (e.g., mitigation, insanity defense) due process rights have been preserved.